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THE CORN REFINERS ASSOCIATION, INC., ARCHER-DANIELS-MIDLAND COMPANY,
12 CARGILL, INC., INGREDION INCORPORATED, AND TATE & LYLE INGREDIENTS
AMERICAS, INC.
13

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 WESTERN SUGAR COOPERATIVE,
a Colorado cooperative, *et al.*,

17 Plaintiffs,

18 v.

19 ARCHER-DANIELS-MIDLAND
COMPANY, a Delaware corporation, *et*
20 *al.*,

21 Defendants.
22
23

Case No. CV11-3473 CBM (MANx)

[Discovery Matter]

**DECLARATION OF BRYNA J.
DAHLIN IN SUPPORT OF
DEFENDANTS' POSITION
ARTICULATED IN THE JOINT
STIPULATION REGARDING
PLAINTIFFS' MOTION TO
COMPEL DE-DESIGNATION OF
DOCUMENTS PRODUCED AS
"CONFIDENTIAL" OR "HIGHLY
CONFIDENTIAL – ATTORNEYS'
EYES ONLY"**

Hearing Date: January 21, 2014_____
Time: 10:00 a.m._____
Place: Courtroom 580
U.S. Magistrate Judge
Margaret A. Nagle

Discovery Cutoff: June 30, 2014
Pretrial Conference: November 14, 2014
Trial Date: None Set

DECLARATION OF BRYNA J. DAHLIN

I, Bryna J. Dahlin, declare as follows:

1. I am a partner in the law firm Winston & Strawn LLP, attorneys for the Corn Refiners Association, Inc. ("CRA") and its Member Companies in this matter. I am licensed to practice law in the State of Illinois and I am admitted *pro hac vice* for this matter. I submit this declaration in support of Defendants' position as set forth in the Joint Stipulation Regarding Plaintiffs' Motion to Compel De-Designation of Documents Produced as "Confidential" or "Highly Confidential – Attorneys' Eyes Only." I have personal knowledge of the matters set forth herein, and if called as a witness, could and would competently testify thereto.

2. Attached as **Exhibit 1** is a true and correct copy of SAI00031690 a document Plaintiffs produced in this litigation.

3. Attached as **Exhibit 2** is a true and correct copy of a press release, "Enough is Enough: There's Only One Sugar...And It's Not High-Fructose Corn Syrup" available at <http://www.sugar.org/enough-is-enough-theres-only-one-sugarand-its-not-high-fructose-corn-syrup/>.

4. Attached as **Exhibit 3** is a true and correct copy of MSC00000268, a document Plaintiffs produced in this litigation.

5. Attached as **Exhibit 4** is a true and correct copy of SAI00008336, a document Plaintiffs produced in this litigation.

6. Attached as **Exhibit 5** is a true and correct copy of SAI00045706, a document Plaintiffs produced in this litigation.

7. Attached as **Exhibit 6** is a true and correct copy of SAI00042805, a document Plaintiffs produced in this litigation.

8. Attached as **Exhibit 7** is a true and correct copy of SAI00042942, a document Plaintiffs produced in this litigation.

9. Attached as **Exhibit 8** is a true and correct copy of SAI00051283, a document Plaintiffs produced in this litigation.

1 10. Attached as **Exhibit 8A** is a true and correct copy of SAI00037076, a
2 document Plaintiffs produced in this litigation.

3 11. Attached as **Exhibit 9** is a true and correct copy of SAI00001766, a
4 document Plaintiffs produced in this litigation.

5 12. Attached as **Exhibit 10** is a true and correct copy of SAI00053592, a
6 document Plaintiffs produced in this litigation.

7 13. Attached as **Exhibit 11** is a true and correct copy of SAI00000641, a
8 document Plaintiffs produced in this litigation.

9 14. Attached as **Exhibit 12** is a true and correct copy of a letter sent by
10 Plaintiffs' counsel on November 13, 2013 and a true and correct copy of
11 SAI00049722, a document Plaintiffs produced in this litigation.

12 15. Attached as **Exhibit 13** is a true and correct copy of a press release,
13 "Corn Processors Pay Advocates, Claiming They Are Science Experts, According to
14 New Legal Filing From the Sugar Association" available at
15 [http://globenewswire.com/news-release/2013/10/16/581008/10052948/en/Corn-](http://globenewswire.com/news-release/2013/10/16/581008/10052948/en/Corn-Processors-Pay-Advocates-Claiming-They-Are-Science-Experts-According-to-New-Legal-Filing-From-The-Sugar-Association.html)
16 [Processors-Pay-Advocates-Claiming-They-Are-Science-Experts-According-to-New-](http://globenewswire.com/news-release/2013/10/16/581008/10052948/en/Corn-Processors-Pay-Advocates-Claiming-They-Are-Science-Experts-According-to-New-Legal-Filing-From-The-Sugar-Association.html)
17 [Legal-Filing-From-The-Sugar-Association.html](http://globenewswire.com/news-release/2013/10/16/581008/10052948/en/Corn-Processors-Pay-Advocates-Claiming-They-Are-Science-Experts-According-to-New-Legal-Filing-From-The-Sugar-Association.html)

18 16. Attached as **Exhibit 14** is a true and correct copy of a report available
19 at <http://www.consumerfreedom.com/downloads/sai.pdf>

20 17. Attached as **Exhibit 15** is a true and correct copy of SAI00006370, a
21 document produced by Plaintiffs in this litigation.

22 18. Attached as **Exhibit 16** is a true and correct copy of ten documents
23 produced by Plaintiffs in this litigation which are designated as "Confidential" or
24 "Highly Confidential – Attorneys' Eyes Only."

25 19. Attached as **Exhibit 17** is a true and correct copy of SAI00001609, a
26 document produced by Plaintiffs in this litigation.

27 20. Attached as **Exhibit 18** is a true and correct copy of a press release,
28 "High Fructose Corn Syrup is Deemed 'The New Trans Fat'" available at

1 <http://www.citizens.org/high-fructose-corn-syrup-deemed-new-trans-fat/>.

2 21. Attached as **Exhibit 19** is a true and correct copy of a press release,
3 “Sugar Association Concerned About Court Ruling’s Impact on Free Speech”
4 available at [http://globenewswire.com/news-](http://globenewswire.com/news-release/2013/09/18/574364/10049076/en/Sugar-Association-Concerned-About-Court-Ruling-s-Impact-on-Free-Speech.html)
5 [release/2013/09/18/574364/10049076/en/Sugar-Association-Concerned-About-Court-](http://globenewswire.com/news-release/2013/09/18/574364/10049076/en/Sugar-Association-Concerned-About-Court-Ruling-s-Impact-on-Free-Speech.html)
6 [Ruling-s-Impact-on-Free-Speech.html](http://globenewswire.com/news-release/2013/09/18/574364/10049076/en/Sugar-Association-Concerned-About-Court-Ruling-s-Impact-on-Free-Speech.html)

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8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct. Executed on December 16, 2013, at
10 Chicago, Illinois.

11 /s/ Bryna J. Dahlin

12 Bryna J. Dahlin

13 *Additional counsel for Defendants:*

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