

Table of Exhibits

Referenced in

“Notice of Intent to Sue – National Animal Identification System” (5/14/08)

Exhibits referenced in the Notice of Intent to Sue letter (NOI) are in PDF format and designated alphabetically. See file “Size” and number of pages (pp) in the “Date” column. The table gives page (p) and footnote (F) references for each.

Key - USDA: United States Department of Agriculture
 APHIS: Animal and Plant Health IS
 VS: Veterinary Services
 MDA: Michigan Department of Agriculture

NOTE: To use the Links, hold <CTRL> key while right-clicking the “mouse” on the link.

#	Date	Exhibit – Title / Description	Reference	Size	Link
	5/14/08 25pp	Notice of Intent to Sue – Letter from David G. Cox (Lane Alton Horst) to Secretary Ed Schafer (USDA) and Director Don Koivisto (MDA), “Re: Notice of Intent to Sue – National Animal Identification System” (May 14, 2008)		317k	Notice of Intent to Sue
A	4/25/05 22pp	Draft Strategic Plan – USDA-APHIS, National Animal Identification System (NAIS) – A State-Federal Industry Cooperative Effort, “Draft: Strategic Plan 2005 to 2009” (April 25, 2005)	p3 - F9	1717k	Exhibit A
B	4/25/05 34pp	Draft Program Standards – USDA-APHIS, National Animal Identification System (NAIS) – “Draft Program Standards”: A Discussion Document (April 25, 2005)	p3 – F9	3452k	Exhibit B
C	4/06 9pp	Strategies for the Implementation of NAIS – USDA-APHIS, National Animal Identification System “Strategies for the Implementation of NAIS” (April 2006)	p3 – F10	415k	Exhibit C
D	11/06 66pp	User Guide – USDA, National Animal Identification System (NAIS), “A User Guide: and Additional Information Resources – Draft Version” (November 2006)	p3 – F11	3631k	Exhibit D
E	12/07 57pp	Revised User Guide – USDA-APHIS, “National Animal Identification System (NAIS) – A User Guide: and Additional Information Resources”, Version 2.0 (December 2007)	p3 – F11	2669k	Exhibit E

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F	11/22/06 28pp	Initial Announcement – USDA-APHIS-VS, Initial Announcement, “Cooperative Agreements for the Implementation of the National Animal Identification System” (November 22, 2006)	p3 – F12 p4 – F22	1299k	Exhibit F
G	12/12/07 77pp	Business Plan – USDA-APHIS, “Draft - A Business Plan to Advance Animal Disease Traceability Through the Harmonization of State, Federal, and Industry Programs and Convergence with the National Animal Identification System” (December 12, 2007)	p4 – F15	5001k	Exhibit G
H	11/1/04 1p	November 2004 Letter – MDA-Animal Industry Division, Letter from Michael S. VanderKick (DVM, TB Program Coordinator) to Michigan Cattle Producers (November 1, 2004)	p6 – F34	51k	Exhibit H
I	11/06 1p	November 2006 Letter – MDA-Animal Industry Division, Letter from Steven L Halstead (DVM, MS, State Veterinarian and Division Director) to Michigan Cattle Producers (November 2006)	p7 – F42	55k	Exhibit I
J	6/15/07 5pp	Article quoting Halstead – Paul W. Jackson, “TB-Free status delayed after state fails USDA review”, Michigan <i>Farm News</i> (June 15, 2007)	p8 – F45	222k	Exhibit J
K	5/10/08 1p	Farmer member declaration - Robert R. Keyworth, “Declaration of Robert R. Keyworth” (notarized by Schutt on May 10, 2008)	p14 – F77	64k	Exhibit K
L	5/6/08 1p	Farmer member declaration - Joe Golimbieski, “Declaration by Joe Golimbieski” (notarized by Szostak on May 6, 2008)	p14 – F77	67k	Exhibit L

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#	Date	Exhibit – Title / Description	Reference	Size	Link
M	5/8/08 4pp	Veterinarian declaration - Dr. C. Glen Dupree, “Declaration of Dr. Glen Dupree” (signed May 8, 2008)	p15 – F79	167k	Exhibit M
N	4/08 94pp	“CAFOs Uncovered” – Doug Gurian-Sherman, “CAFOs Uncovered: The Untold Costs of Confined Animal Feeding Operations”, Union of Concerned Scientists (April 2008) [PDF format available at www.ucsusa.org]	p15 – F80	7779k	Exhibit N
O	11/19/07 51pp	Implanted microchips – Katherine Albrecht (Ed.D.), “Microchip-Induced Tumors in Laboratory Rodents and Dogs: A Review of the Literature, 1990-2006”, CASPIAN Consumer Privacy (November 19, 2007) [available online at http://www.antichips.com/cancer]	p16 – F82	2746k	Exhibit O
P	5/9/08 1p	Veterinarian declaration – Dr. Melvin Tomas Massey, “Declaration of Dr. Melvin Massey, DVM” (signed May 9, 2008)	p16 – F82 p20 – F109	50k	Exhibit P
Q	5/31/06	Microchip designated by USDA – Letter from Barbara Masin (Electronic Identification Devices, Ltd.) to Judith McGeary (Farm and Ranch Freedom Alliance), “Ref.: National standard for livestock identification” (May 31, 2006)	p21 – F116	71k	Exhibit Q
R	5/07 53pp	USDA pilot projects – USDA, The National Animal Identification System (NAIS): Pilot Projects/Field Trials Summary, “2004 Initial Pilot Projects Final Report; 2005-07 Project Descriptions” (May 2007)	p22 – F117	2784k	Exhibit R
S	34pp	Experience in Australia – John Carter, “Australian Beef Association Response to NSW Agriculture. Regulatory Impact Statement and Draft Regulation on NLIS.” Australian Beef Association [NLIS = National Identification Livestock Scheme; partial copy available at http://www.cattlefacts.com.au/Issues_nlis.htm#ABA%20case]	p22 – F117	1361k	Exhibit S

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#	Date	Exhibit – Title / Description	Reference	Size	Link
T	7/15/06 16pp	“Analysis of the National Animal Identification System” - Farm and Ranch Freedom Alliance (July 15, 2006)	p22 – F119	946k	Exhibit T
U	5/12/08 1p	“Declaration by Rev. Rosanne Wyant” – Reverend Rosanne Wyant, (notarized by Moulter 5/12/08)	p23 – 127	65k	Exhibit U