

# Exhibit DDD

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

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ALICE H. ALLEN & LAURENCE E. ALLEN,  
d/b/a Al-Lens Farm, GARRET SITTS  
and RALPH SITTS, JONATHAN HAAR and  
CLAUDIA HAAR, on behalf of themselves  
and all other similarly situated,

Plaintiffs,

vs.

Docket No. 5:09-cv-00230

DAIRY FARMERS OF AMERICA, INC.,  
DAIRY MARKETING SERVICES, LLC,  
and DEAN FOODS COMPANY,

Defendants.

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Videotape Deposition Testimony of BRAD KEATING,  
taken at the Law Firm of Bond, Schoeneck & King, One Lincoln  
Center, Syracuse, New York, before Anne M. Messineo,  
Registered Professional Reporter and Notary Public in and for  
the State of New York on the 11th day of May 2011.  
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1 provide a range of the affect on the premiums?

2 MR. KUNEY: Objection to form.

3 A. I will first translate what the cost is. What's  
4 causing this issue. I will bring that back to a dollar  
5 amount, and then I will try and provide some range so people  
6 have an idea of what they're looking at.

7 Q. And -- but the range that you're talking about is  
8 the range and the amount of the adjustment to the premiums?

9 A. Yes.

10 MR. KUNEY: Objection to form.

11 Q. And that could be an upward or a downward  
12 adjustment, depending on the market conditions?

13 A. Yes. And costs associated with running the  
14 organization, market conditions would include balancing,  
15 sales. New demand, less demand. Plant closures. Plant  
16 additions.

17 Q. And will you explain to the people present at these  
18 board meetings the expected adjustment and the range of  
19 premiums for both DFA and Dairylea?

20 MR. KUNEY: Objection to form.

21 A. Again, Dairylea and DFA have their own financials.  
22 Their own set of books. But the proceeds from the milk

1 marketing venture of DMS affect each unit about the same.  
2 Meaning if all the milk goes into DMS, DMS markets the milk  
3 and the price comes down. Effect is roughly approximate to  
4 each. Then each has the ability to decide what it wants to do  
5 for its own premiums.

6 Q. I see. So you're giving a range in the premium  
7 adjustment that is expected for both of the two businesses,  
8 but you're saying that the range is going to be roughly the  
9 same?

10 MR. KUNEY: Objection to form. Misstates the  
11 testimony.

12 A. What I'm saying is that they're both contributing  
13 the work. DMS markets the milk. The effect from the milk  
14 marketing change up or down comes back and affects each  
15 equally. Each unit has its own set of financials and each  
16 unit can decide what it wants to do. Premiums do not always  
17 move in the same way at the same time with each organization.  
18 It's a management decision.

19 Q. And is that why you give a range of what the premium  
20 adjustment is likely to be?

21 MR. KUNEY: Objection to form.

22 A. I give more of a range to help the members and the