

EXHIBIT 4

milk and to be assured of a more stable market. We felt that by joining with a larger cooperative, we could better negotiate sales on a region-wide basis. In connection with joining Dairylea, Oneida Madison received its own representative on the Dairylea Board – cooperative – a role that I currently fill.

3. If I were not marketing my milk through Oneida Madison, I would have many other markets from which to choose, but many of them would be independent markets with little or no market stability. The whole reason I am part of a cooperative is to make sure I always have a market for my milk. As a member of Oneida Madison (and therefore, of Dairylea and DMS), I do not have to worry about being dropped by a milk processor due to market conditions – instead, the cooperative makes sure that all of the milk produced by Oneida Madison farms has a home, regardless of the supply and demand situation.

4. By working with Dairylea, we have been able to increase our pay price to farmers significantly. Before joining Dairylea, Oneida Madison producers could typically expect a premium of around \$0.10 /cwt, which was the most we were able to get from the market. Since we have been with Dairylea that amount has tripled.

5. As a member of the Dairylea Board, I've seen the inner-workings of the cooperative for almost 20 years. In 1999, Dairylea and DFA created Dairy Marketing Services, which is a joint milk marketing venture between the two. Since then, the two boards have met together on a regular basis (they also meet separately) and share the same philosophy of working together to benefit dairy farms. Cooperatives are owned by farmers, governed by farmers and make decisions based on what's best for the farmer-members.

6. I believe DMS is the best way for dairy farms to market their milk effectively. If you look across the United States, there are marketing agencies in almost every region because farmers have seen the benefits of working together. And for those farmers who aren't interested

in marketing through an agency, they are free to market their milk how they wish, including as independents. In today's day and age of large dairy processors, though, there needs to be bigger blocks of milk in order for the farms to have a seat at the negotiating table. Also, there are cost savings that come along with marketing milk collaboratively, from reduced overhead to reduced transportation costs, all of which results in saving farmers money.

7. The relief that the Plaintiffs are asking for in this lawsuit stands to undo years of work by cooperatives – and their farmer-leaders – to improve marketing conditions for farmers by working together. As one of those farmer-leaders who has been there from the beginning of DMS, I can tell you that the purpose of DMS is not to harm farmers, as the premise of the lawsuit would state. It is true that milk prices went down when the lawsuit was filed, but anyone who has been a farmer for long enough will tell you that prices go in cycles, and down cycle in 2009 was due to a lack of demand as a result of a national and international recession, combined with very high on-farm costs for things like feed. I firmly believe that without DMS during this time, prices for farmers would have been even worse, because it was DMS that was able to hold the line on prices when milk when there was excess milk in the marketplace. 2009 and early 2010 were true tests of the DMS model, and it performed well by preserving over-order premiums during a time of historically high production and lack of demand.

8. But my reason for writing this Declaration is not that I believe the Plaintiffs and their lawyers have a fundamentally misguided understanding of the industry, although I believe they do. Rather, it is because even if they were right in bringing these claims, they still would not represent me or to my knowledge the Oneida Madison and Dairylea farmers that I represent as an elected Board Member.

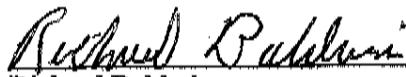
9. First, the lawsuit has named DMS as one of only two remaining Defendants along with DFA; but since I market my milk through DMS, that means the lawyers who claim to

represent me are also suing me, and other farmers like me. I do not understand how these Plaintiffs could they have my best interests in mind AND how they could claim to represent me if I am also part of the group whose marketing agency they are suing for damages, and seeking to make less effective. It only adds to my frustration to know that in addition to claiming to represent me, when they do not, the lawyers for the Plaintiffs have asked to have their fees paid by DMS – meaning by me, and farmers like me – for a lawsuit that harms us.

10. The changes Plaintiffs are seeking to weaken DMS can have real negative impacts on DMS, DFA, Dairylea and ultimately, Oneida Madison farmers in the form of a lower milk price. The strategy we have adopted is to work together, pool our milk together, and share in cost efficiencies. Any step the Plaintiffs succeed in taking to break DMS apart or force it to stop marketing milk in the way it does, has the effect of hurting the farmers in DMS and empowering the processing plants to push for lower milk prices. As soon as there is a lower price for milk in a region, dairy processing companies will seek to buy milk at that price – they certainly won't be looking to pay more.

11. What the Plaintiffs seem not to understand is that when you sue the cooperative, you are suing its farmers; it's a circle, and at the end of it, no one will win except maybe the lawyers. The handful of farmers and their lawyers who have chosen to take that step do not represent me, and to my knowledge they do not represent the other farms that like me choose to market through DMS.

I declare under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on July, 1, 2011, in ONEIDA-N.Y.


Richard Baldwin