



Drexel Chemical Company

June 28, 2010

To: Distributors

From: Jim Pelt

Sub: Supplemental label for Imitator® Plus

Attached is a copy of our approved supplemental label for use as a herbicide in FLEX COTTON with the Roundup Ready® gene.

As you know Imitator® Plus is also approved for these Roundup Ready® crops:

Alfalfa
Canola
Corn
Cotton
Soybeans
Sugar Beets

Please visit our website www.DrexChem.com for complete listing of labels and MSDS

Thank you very much for your cooperation and support.

Jim Pelt

VP Marketing

Imitator® Plus is a registered trade mark of Drexel Chemical Co.
Roundup Ready® is a registered trade mark of Monsanto.

SUPPLEMENTAL LABELING

41% Glyphosate
Isopropylamine Salt
With Full
Surfactant Load

Drexel®

Herbicide For
Roundup Ready®
Crops, And Now, For
Use On Roundup
Ready Flex Cotton

Imitator® Plus

Herbicide

(EPA Reg. No. 19713-526)

FOR USE AS A HERBICIDE IN FLEX COTTON WITH THE ROUNDUP READY® GENE

READ THE ENTIRE DREXEL IMITATOR PLUS LABEL BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABEL. THIS LABEL EXPIRES ON DECEMBER 31, 2012. DO NOT USE OR DISTRIBUTE THIS LABEL AFTER THIS DATE.

KEEP OUT OF REACH OF CHILDREN CAUTION

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This labeling and the EPA registered labeling must be in the possession of the user at time of pesticide application.

All applicable directions, restrictions and use precautions on DREXEL IMITATOR PLUS label(s) are to be followed. This labeling contains supplemental instructions and restrictions for use of this product which may not appear on the DREXEL IMITATOR PLUS label. Follow the instructions carefully.

Flex Cotton with Roundup Ready Gene

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT CROPS (EXCEPT AS SPECIFIED FOR INDIVIDUAL ROUNDUP READY CROPS), DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

See "USE INFORMATION" and "MIXING, ADDITIVES, AND APPLICATION INSTRUCTIONS" section of the Drexel Imitator Plus label for important product performance information.

The instructions provided in this section are specific to, and may only be used with, varieties designated as Roundup Ready Flex cotton. Applications described in this section on other than Roundup Ready Flex cotton will cause crop injury and reduced yields. DO NOT combine the instructions in this section, with those in the "ROUNDUP READY COTTON" section of the main label, or with any other Roundup Ready cotton or Roundup Ready Flex cotton instructions on labeling for this or any other glyphosate-containing products. Drift of this product from an application made to Roundup Ready Flex cotton onto adjacent fields of post 4-leaf (node) Roundup Ready cotton may cause extensive injury including boll loss, delayed maturity and/or yield loss.

TYPES OF APPLICATION: Preplant, At-Planting, Preemergence, Postemergence (In-Crop), Preharvest

Maximum Application Rate of this Product (Qts./A)	
Combined total per year for all applications	8
Total of all Preplant, At-planting, Preemergence applications	5
Total of all in-crop applications from cracking to 60 percent open bolls	6
Total of all in-crop applications between lay-by and 60 percent open bolls	2
Total of all in-crop applications from 60 percent bolls open to 7 days prior to harvest	2
Total of all in-crop applications from emergence through harvest	6

PRECAUTIONS AND RESTRICTIONS: See the "ROUNDUP READY CROPS" section of the main label for precautionary instructions for use in Roundup Ready crops.

Preplant, Preemergence, At-Planting

USE INSTRUCTIONS: This product may be applied before, during or after planting Roundup Ready Flex cotton.

TANK MIXTURES: This product may be tank-mixed with 2,4-D or Clarity and applied prior to planting only. This product may be tank-mixed with the following products and applied prior to crop emergence. Ensure that the specific product being used is labeled for application prior to planting or the emergence of cotton. Read and follow label directions of all products in the tank mixture.

clomazone, diuron, flumioxazin, fluometuron, fomesafen, metolachlor, s-metolachlor, pendimethalin, prometryn, pyriithiobac-sodium

Caparol, Command, Cotoran, Cotton PRO, Direx, Dual MAGNUM, Dual II MAGNUM, Karmex, Meturon, Me-Too-Lachlor™ Herbicide, PARRLAY, Prowl H₂O, Reflex, Staple, Valor, Zorial

PRECAUTIONS AND RESTRICTIONS: Maximum quantity of this product that may be applied for all preplant, at-planting and pre-emergence applications combined is 5 quarts per acre per season. Refer to individual tank-mix product label for restrictions and precautions; use according to the most restrictive precautionary statements for each product in the tank mixture.

Postemergence (In-Crop)

USE INSTRUCTIONS: When applied in accordance with the label, this product will control listed annual grasses and broadleaf weeds in Roundup Ready Flex cotton. To maximize yield potential, spray cotton early to eliminate competing weeds. Many perennial weeds will be controlled or suppressed with one or more applications of this product. Use an initial application of 1 quart per acre to control or suppress 1- to 3-inch tall annual grass and broadleaf weeds. This product may be applied by ground application equipment at rates up to 1.5 quarts per acre per application to Roundup Ready Flex cotton. In addition to broadcast applications, postdirected equipment may be used to achieve more thorough weed coverage.

TANK MIXTURES: This product may be tank-mixed with the following products and applied postemergence (in-crop) over the top of Roundup Ready Flex cotton. Ensure that the specific product being used is labeled for application postemergence (in-crop) to cotton. Read and follow label directions of all products in the tank mixture.

clethodim, fluazifop-P-butyl, fomesafen, metolachlor, s-metolachlor, pyriithiobac-sodium, quizalofop-p-ethyl, sethoxydim, trifloxysulfuron-sodium

Assure II, Dual MAGNUM, Envoke, Fusilade, Me-Too-Lachlor Herbicide, Poast Plus, Select, Staple

Staple may cause leaf yellowing and/or leaf crinkling when applied postemergence (in-crop) to Roundup Ready Flex cotton. Dual Magnum and Me-Too-Lachlor Herbicide over the top of Roundup Ready Flex cotton may cause leaf injury in the form of necrotic spotting.

This product can be tank-mixed with the following product for in-crop application using precision post-directed or hooded sprayer. Ensure that the specific product being used is labeled for application postemergence (in-crop) to cotton. Read and follow label directions of all product in the tank mixture.

carfentrazone-ethyl, diuron, flumioxazin, fluometuron, linuron, pendimethalin, prometryn, pyriithiobac-sodium, trifloxysulfuron-sodium

Aim, Caparol, Cotoran, Direx, Envoke, Layby-Pro, PARRLAY, Prowl H₂O, Staple, Valor

Staple may cause leaf yellowing and/or leaf crinkling when applied postemergence (in-crop) in Roundup Ready Flex cotton.

PRECAUTIONS AND RESTRICTIONS: The maximum rate of this product for any single in-crop application is 1.5 quarts per acre using ground application equipment. In-crop application rates above 1 quart of this product per acre made alone or with the addition of other crop chemical products containing surfactant may cause a crop response including leaf speckling or leaf necrosis. Do not exceed a maximum rate of 1 quart of this product when making applications by air. Between layby and 60 percent open bolls, the maximum combined total rate of this product that may be applied is 2 quarts per acre. The maximum combined total rate of all applications made from crop emergence to 60 percent open bolls must not exceed 6 quarts per acre. **DO NOT ADD ADDITIONAL SURFACTANT OR ADDITIVES CONTAINING SURFACTANT TO THIS PRODUCT FOR OVER-THE-TOP APPLICATION TO ROUNDUP READY FLEX COTTON.** Refer to individual tank-mix product label for restrictions and precautions; use according to the most restrictive precautionary statements for each product in the tank mixture.

Preharvest

USE INSTRUCTIONS: This product may be applied to Roundup Ready Flex cotton up to 2 quarts per acre for annual and perennial weed control prior to harvest after 60 percent boll crack.

NOTE: This product will not enhance the performance of harvest aids when applied to Roundup Ready Flex cotton.

PRECAUTIONS AND RESTRICTIONS: Allow a minimum of 7 days between application and harvest of Roundup Ready Flex cotton. DO NOT ADD ADDITIONAL SURFACTANT OR ADDITIVES CONTAINING SURFACTANT TO THIS PRODUCT FOR PRE-HARVEST APPLICATION TO ROUNDUP READY FLEX COTTON.

ATTENTION: USE OF THIS PRODUCT IN ACCORDANCE WITH LABEL DIRECTIONS IS EXPECTED TO RESULT IN NORMAL GROWTH OF ROUNDUP READY FLEX COTTON. HOWEVER, DUE TO THE SENSITIVITY OF COTTON FRUITING TO VARIOUS ENVIRONMENTAL CONDITIONS, AGRONOMIC PRACTICES AND OTHER FACTORS, IT IS IMPOSSIBLE TO ELIMINATE ALL RISKS ASSOCIATED WITH THIS PRODUCT, EVEN WHEN APPLICATIONS ARE MADE IN CONFORMANCE WITH THE LABEL SPECIFICATIONS. IN SOME CASES, THESE FACTORS CAN RESULT IN BOLL LOSS, DELAYED MATURITY AND/OR YIELD LOSS.

