UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	MDL No. 2741
EMBIETT ETHOMION	Case No. 16-md-02741-VC
	PLAINTIFFS' NOTICE TO TAKE VIDEOTAPED DEPOSITION OF JESUDOSS ROWLAND
This document relates to:	
ALL ACTIONS	

PLAINTIFFS' NOTICE TO TAKE VIDEOTAPED DEPOSITION OF JESUDOSS ROWLAND

TO: Defendant **MONSANTO COMPANY** by and through its attorneys of record, Joe Hollingsworth, Eric Lasker, Hollingsworth LLP, 1350 I Street NW, Washington, DC 20005.

TO: **Jesudoss Rowland**, by and through his attorneys of record, Jon Jacobs, Jacobs LLC, 1100 New Hampshire Avenue, N.W. Suite 300 Washington, D.C. 20037; and

Andrew Stewart, Vinson & Elkins, 2200 Pennsylvania Ave NW, Suite 500 West, Washington DC 20037

Please take notice that pursuant to Rule 30 and Rule 45 of the Federal Rules of Civil Procedure,

Plaintiffs, by and through their counsel, will take the videotaped deposition upon oral

examination of Jesudoss Rowland at Vinson & Elkins, 2200 Pennsylvania Ave NW, Suite 500

West, Washington DC 20037 on April 26, 2017 beginning at 12:00p.m. The deposition will be

taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal

Rules of Civil Procedure, and will continue day-to-day until the examination is completed. The

witness shall produce the documents identified in Exhibit A, at least 7 days before deposition.

The subpoena served upon the EPA and Mr. Rowland is incorporated herein by reference; the

date is superseded by this Notice and the scope of deposition may be altered by subsequent

agreement with the United States of America or by Court Order.

DATED: March 23, 2017

Respectfully submitted,

/s Robin Greenwald, Michael Miller and

Aimee Wagstaff

Robin Greenwald

rgreenwald@weitzlux.com

Weitz & Luxenberg

700 Broadway

New York NY 10003

Ph 212-558-5500

F 212-344-5461

Michael Miller

mmiller@millerfirmllc.com

The Miller Firm LLC

108 Railroad Ave

Orange VA 22960

Ph 540 672 4224

F 540 672 3055

Aimee H. Wagstaff

Aimee.wagstaff@andruswagstaff.com Andrus Wagstaff, P.C. 7171 West Alaska Drive Lakewood CO 80226 Ph 720-255-7623

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 23, 2017 I electronically filed this Notice using the CM/ECF system which will send a notification of such filing to counsel of record, and sent it by electronic mail To Jon Jacobs and Andrew Stewart, counsel for witness Jesudoss Rowland.

/s/ Michael Miller

EXHIBIT A

- 1. Any documents relating to the deposition topics as contained in the prior subpoena served by Plaintiffs, subject to potential modification of the topic list by agreement with EPA/USA or Order of Court, that are in Mr. Rowland's personal files and were created or received outside of official EPA channels, including but not limited to emails, notes, memos, audio recordings, video recordings, text messages, instant messaging, and letters.
- 2. Documents reflecting payments from the chemical industry to Mr. Rowland or his immediate family members.