

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL No. 2741

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 Rowland is incorporated herein by reference; the date is superseded by this Notice and the scope of deposition may be altered by subsequent agreement with the United States of America or by Court Order.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
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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.