

# **Attachment 2**

**REQUESTS FOR PRODUCTION**

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2 Plaintiffs’ co-lead counsel and Baum Hedlund shall produce the following documents to  
3 the Court and Hollingsworth LLP within the time specified by the Court. To the extent that  
4 plaintiffs assert a claim of privilege over any of the documents, those documents shall be  
5 produced to the Court by the same deadline for *in camera* review in unredacted form and a copy  
6 that redacts only the privileged information will be provided to Hollingsworth LLP together with  
7 a privilege log. If the Court on *in camera* review determines that withheld information is not  
8 privileged, it will provide or order plaintiffs to provide that information to Hollingsworth LLP.

9  
10 1. Produce all documents discussing, describing, referencing, or concerning the  
11 appointment of Brent Wisner and/or Baum Hedlund Aristei Goldman, PC (“Baum Hedlund”)   
12 “by the Plaintiffs’ Leadership in the MDL” to challenge the confidentiality of documents, as  
13 noted in Brent Wisner’s June 30, 2017, letter to Monsanto’s counsel.

14 2. Produce all documents created, sent, or received by or to Brent Wisner, Baum  
15 Hedlund, or any of the members of the Plaintiffs’ Leadership in the MDL on or after July 13,  
16 2017, and on or before July 31, 2017, acknowledging or referencing that Monsanto would not  
17 retract claims of confidentiality of the documents at issue in PTO 28.

18 3. Produce all documents created, sent, or received by or to Brent Wisner, Baum  
19 Hedlund, or any of the members of the Plaintiffs’ Leadership in the MDL on or after July 13,  
20 2017, and on or before July 31, 2017, acknowledging or referencing the position taken by  
21 Monsanto during the July 13, 2017, meet and confer.

22 4. Produce all document(s) in which Brent Wisner or Baum Hedlund approached  
23 any of plaintiffs’ co-lead counsel in May or June 2017 regarding seeking to de-designate  
24 documents (referenced in Paragraph 3 of the Response of Michael J. Miller to PTO 28, ECF No.  
25 451).

26 5. Produce all document(s) in which Michael Miller or The Miller Firm, LLC  
27 (“Miller Firm”) recommended against de-designation efforts and/or declined to participate in  
28

1 such efforts (referenced in Paragraph 4 of the Response of Michael J. Miller to PTO 28, ECF No.  
2 451).

3 6. Produce the June 12, 2017 document(s) referenced in Paragraph 5 of the  
4 Response of Michael J. Miller to PTO 28, ECF No. 451, and all related correspondence.

5 7. Produce all documents related to the July 27, 2017 email referenced in Paragraph  
6 7 of the Response of Michael J. Miller to PTO 28, ECF No. 451.

7 8. Produce the July 30, 2017 email referenced in Paragraph 8 of the Response of  
8 Michael J. Miller to PTO 28, ECF No. 451, inclusive of all emails in the same chain and related  
9 email threads.

10 9. Produce all documents created, sent, or received on or before July 31, 2017  
11 (inclusive of both internal communications of plaintiffs' counsel and/or communications with  
12 other individuals or entities, e.g., Carey Gillam, media, and regulators) discussing, describing,  
13 referencing, or concerning the public release or planned public release of any of the 86  
14 documents at issue in PTO 28.

15 10. Produce all documents created, sent, or received on or before July 31, 2017  
16 (inclusive of both internal communications of plaintiffs' counsel and/or communications with  
17 other individuals or entities, e.g., Carey Gillam, media, and regulators) discussing, describing,  
18 referencing, or concerning Monsanto's (alleged) potential to waive the confidentiality of any of  
19 the 86 documents at issue in PTO 28.

20 11. Produce all documents created, sent, or received on or before July 31, 2017  
21 (inclusive of both internal communications of plaintiffs' counsel and/or communications with  
22 other individuals or entities, e.g., Carey Gillam, media, and regulators) that discuss, describe,  
23 reference, or concern a plan to make any of the 86 documents at issue in PTO 28 publicly  
24 available, including but not limited to plans to provide copies to any individuals or entities  
25 including Carey Gillam; any and all print, radio, television or other electronic media; the EPA  
26 Office of Inspector General (OIG); California Office of Environmental Health Hazard  
27 Assessment (OEHHA); and any members of the EU Parliament.  
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