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8 *Attorney for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 **IN RE ROUNDUP PRODUCTS**  
13 **LIABILITY LITIGATION**

MDL No. 2741

Case No. 16-md-02741

14 This Document Relates To All Actions

15  
16 **DECLARATION OF AIMEE H. WAGSTAFF IN SUPPORT OF PLAINTIFFS’**  
17 **MEMORANDUM OF LAW IN OPPOSITION TO MONSANTO COMPANY’S**  
18 ***DAUBERT* AND SUMMARY JUDGMENT MOTION AND IN SUPPORT OF**  
19 **PLAINTIFFS’ DAUBERT MOTION**

20 I Aimee H. Wagstaff, declare:

21 1. I am an attorney and a member of the Executive Committee of MDL No. 2741. I  
22 make this declaration in support of Plaintiffs’ Memorandum of Law in Opposition to Monsanto  
23 Company’s *Daubert* and Summary Judgment Motion and in Support of Plaintiffs’ *Daubert*  
24 Motion filed on October 27, 2017. I have personal knowledge of the facts stated herein and, if  
25 called as a witness, I could and would testify competently to these matters.

26 2. Annexed hereto as Exhibit 1 is a true and correct copy of an E-mail from Heather  
27 Pigman to Robin Greenwald (May 17, 2017).  
28

1           3.       Annexed hereto as Exhibit 2 is a true and correct copy of an E-mail from Heather  
2 Pigman to Robin Greenwald (July 24, 2017).

3           4.       Annexed hereto as Exhibit 3 is a true and correct copy of the Expert Report of Dr.  
4 Beate Ritz (May 1, 2017).

5           5.       Annexed hereto as Exhibit 4 is a true and correct copy of the Expert Report of Dr.  
6 Alfred Neugut (Apr. 28, 2017).

7           6.       Annexed hereto as Exhibit 5 is a true and correct copy of the Expert Report of Dr.  
8 Christopher Portier (May 1, 2017).

9           7.       Annexed hereto as Exhibit 6 is a true and correct copy of the Expert Report of Dr.  
10 Charles Jameson (May 12, 2017).

11          8.       Annexed hereto as Exhibit 7 is a true and correct copy of the Expert Report of Dr.  
12 Chadi Nabhan (Apr. 28, 2017).

13          9.       Annexed hereto as Exhibit 8 is a true and correct copy of the Expert Report of Dr.  
14 Dennis Weisenburger (Apr. 21, 2017).

15          10.      Annexed hereto as Exhibit 9 is a true and correct copy of the Expert Report and  
16 Expert Rebuttal Report of Dr. Michael Wolfson (Dec. 17, 1010 and Feb. 11, 2011,  
17 respectively), *Arias, et al. v. Dyncorp, et al.*, Case No. 1:07-cv-01042-ESH.

18          11.      Annexed hereto as Exhibit 10 is a true and correct copy of the Meeting Minutes  
19 and Final Report of the December 13-16, 2016 FIFRA SAP Meeting Held to Consider and  
20 Review Scientific Issues Associated with EPA's Evaluation of the Carcinogenic Potential of  
21 Glyphosate.

22          12.      Annexed hereto as Exhibit 11 is a true and correct copy of MONGLY02060344.

23          13.      Annexed hereto as Exhibit 12 are true and correct copies of MONGLY03550799  
24 and MONGLY03550800.

25          14.      Annexed hereto as Exhibit 13 is a true and correct copy of MONGLY03914265.

26          15.      Annexed hereto as Exhibit 14 is a true and correct copy of the glyphosate patent.

27          16.      Annexed hereto as Exhibit 15 is a true and correct copy of MONGLY00990361.

28          17.      Annexed hereto as Exhibit 16 is a true and correct copy of the EPA Summary of

1 the IBT Review Program (July 1983).

2 18. Annexed hereto as Exhibit 17 is a true and correct copy of MONGLY00233278.

3 19. Annexed hereto as Exhibit 18 is a true and correct copy of MONGLY00235488.

4 20. Annexed hereto as Exhibit 19 is a true and correct copy of MONGLY04278109.

5 21. Annexed hereto as Exhibit 20 is a true and correct copy of MONGLY04278139.

6 22. Annexed hereto as Exhibit 21 is a true and correct copy of MONGLY04268982.

7 23. Annexed hereto as Exhibit 22 is a true and correct copy of Waters, et al., James  
8 M. Parry (1940–2010) *Mutagenesis* (2011) 26 (1): 1-2.

9 24. Annexed hereto as Exhibit 23 is a true and correct copy of MONGLY01314233

10 25. Annexed hereto as Exhibit 24 is a true and correct copy of the Deposition Excerpt  
11 of Mark Martens (Apr. 7, 2017).

12 26. Annexed hereto as Exhibit 25 is a true and correct copy of Williams, et al., *Safety*  
13 *Evaluation and Risk Assessment of the Herbicide Roundup and Its Active Ingredient,*  
14 *Glyphosate, for Humans*, REGULATORY TOXICOLOGY AND PHARMACOLOGY, 31, 117-165  
15 (2000).

16 27. Annexed hereto as Exhibit 26 is a true and correct copy of MONGLY00977264.

17 28. Annexed hereto as Exhibit 27 is a true and correct copy of MONGLY00922458.

18 29. Annexed hereto as Exhibit 28 is a true and correct copy of MONGLY03751016.

19 30. Annexed hereto as Exhibit 29 is a true and correct copy of MONGLY02598454.

20 31. Annexed hereto as Exhibit 30 is a true and correct copy of MONGLY02067858.

21 32. Annexed hereto as Exhibit 31 is a true and correct copy of Kier & Kirkland,  
22 *Review of genotoxicity studies of glyphosate and glyphosate-based formulations*, 43 CRIT. REV.  
23 TOXICOL., 4, 283-315 (2013).

24 33. Annexed hereto as Exhibit 32 is a true and correct copy of MONGLY01691608.

25 34. Annexed hereto as Exhibit 33 is a true and correct copy of MONGLY02117800.

26 35. Annexed hereto as Exhibit 34 is a true and correct copy of MONGLY02145917.

27 36. Annexed hereto as Exhibit 35 is a true and correct copy of MONGLY04086537.

28 37. Annexed hereto as Exhibit 36 is a true and correct copy of MONGLY01228577.

1 38. Annexed hereto as Exhibit 37 is a true and correct copy of the Expert Report of  
2 Dr. Warren Foster.

3 39. Annexed hereto as Exhibit 38 is a true and correct copy of the Expert Report of  
4 Dr. Jay Goodman.

5 40. Annexed hereto as Exhibit 39 is a true and correct copy of the August 24, 2017  
6 Hearing Transcript.

7 41. Annexed hereto as Exhibit 40 is a true and correct copy of MONGLY01207342.

8 42. Annexed hereto as Exhibit 41 is a true and correct copy of MONGLY00989918.

9 43. Annexed hereto as Exhibit 42 is a true and correct copy of MONGLY01021845.

10 44. Annexed hereto as Exhibit 43 is a true and correct copy of MONGLY00977035.

11 45. Annexed hereto as Exhibit 44 is a true and correct copy of  
12 ACQUAVELLAPROD00010215.

13 46. Annexed hereto as Exhibit 45 is a true and correct copy of the Deposition  
14 Transcript Excerpt of John Acquavella (Apr. 8, 2017).

15 47. Annexed hereto as Exhibit 46 is a true and correct copy of Pearce, et al., *IARC*  
16 *Monographs: 40 Years of Evaluating Carcinogenic Hazards to Humans*, 123 ENVIRONMENTAL  
17 HEALTH PERSPECTIVES 6 (June 2015).

18 48. Annexed hereto as Exhibit 47 is a true and correct copy of Bradford Hill, *The*  
19 *Environment and Disease: Association or Causation?* 58 PROC. ROYAL SOC'Y MED. 295  
20 (1965).

21 49. Annexed hereto as Exhibit 48 is a true and correct copy of the Deposition  
22 Transcript and Exhibits of Dr. Aaron Blair (March 20, 2017).

23 50. Annexed hereto as Exhibit 49 is a true and correct copy of the Deposition  
24 Transcript and Exhibits of Dr. Alfred Neugut (Aug. 7, 2017).

25 51. Annexed hereto as Exhibit 50 is a true and correct copy of the Deposition  
26 Transcript and Exhibits of Dr. Lorelei Mucci (Sept. 22, 2017).

27 52. Annexed hereto as Exhibit 51 is a true and correct copy of the Expert Report of  
28 Dr. Lorelei Mucci.

1           53.     Annexed hereto as Exhibit 52 is a true and correct copy of the Deposition  
2 Transcript and Exhibits of Dr. Jennifer Rider (Sept. 21, 2017).

3           54.     Annexed hereto as Exhibit 53 is a true and correct copy of MONGLY02314040.

4           55.     Annexed hereto as Exhibit 54 is a true and correct copy of M. Eriksson et al,  
5 *Pesticide exposure as risk factor for non-Hodgkin lymphoma including histopathological*  
6 *subgroup analysis*, 123 INT’L J CANCER 7, 1657-63 (July 2008).

7           56.     Annexed hereto as Exhibit 55 is a true and correct copy of De Roos. *Integrative*  
8 *Assessment of Multiple Pesticides as Risk Factors for Non-Hodgkin’s Lymphoma Among Men*,  
9 60 OCCUP. ENVIRON MED. e11, 1-9 (2003).

10          57.     Annexed hereto as Exhibit 56 is a true and correct copy of Chang et al., *Meta-*  
11 *Analysis of Glyphosate Use and Risk of Non-Hodgkin Lymphoma*, Exponent 1, 5 (2017).

12          58.     Annexed hereto as Exhibit 57 is a true and correct copy of the Deposition  
13 Transcript and Exhibits of Dr. Dennis Weisenburger (Sept. 11, 2017).

14          59.     Annexed hereto as Exhibit 58 is a true and correct copy of the Deposition  
15 Transcript and Exhibits of Dr. Beate Ritz (Sept. 18, 2017).

16          60.     Annexed hereto as Exhibit 59 is a true and correct copy of Hardell L., et al.,  
17 *Exposure to pesticides as risk factor for non-Hodgkin's lymphoma and hairy cell leukemia:*  
18 *pooled analysis of two Swedish case-control studies*, 43 LEUK LYMPHOMA 5, 1043-49 (2002).

19          61.     Annexed hereto as Exhibit 60 is a true and correct copy of McDuffie, H.H., et al.,  
20 *Non-Hodgkin’s Lymphoma and Specific Pesticide Exposures in Men: Cross-Canada Study of*  
21 *Pesticides and Health*, CANCER EPI., BIOMARKERS & PREVENTION, Vol. 10, 1155–1163  
22 (November 2001).

23          62.     Annexed hereto as Exhibit 61 is a true and correct copy of the deleted slides from  
24 Dr. Blair’s NAPP power point.

25          63.     Annexed hereto as Exhibit 62 is a true and correct copy of Expert Rebuttal Report  
26 of Dr. Beate Ritz (August 18, 2017).

27          64.     Annexed hereto as Exhibit 63 is a true and correct copy of Pahwa M., et al. A  
28 Detailed Evaluation of Glyphosate Use and the Risk of Non-Hodgkin Lymphoma in the North

1 American Pooled Project. Canadian Association for Research on Work and Health; October 16-  
2 18 2016; Toronto, ON (“CARWH 2016”).

3 65. Annexed hereto as Exhibit 64 is a true and correct copy of Pahwa M., et al. An  
4 Evaluation Of Glyphosate Use And The Risks Of Non-Hodgkin Lymphoma Major Histological  
5 Sub-types In The North American Pooled Project (NAPP). International Society for  
6 Environmental Epidemiology; August 31, 2015; Sao Paulo, Brazil (“ISEE 2015”).

7 66. Annexed hereto as Exhibit 65 is a true and correct copy of Pahwa M., et al. A  
8 Detailed Assessment of Glyphosate Use and the Risks of Non-Hodgkin Lymphoma Overall and  
9 by Major Histological Sub-types: Findings from the North American Pooled Project.  
10 International Agency for Research on Cancer; June 10, 2016 (“IARC 2016”).

11 67. Annexed hereto as Exhibit 66 is a true and correct copy of the draft manuscript of  
12 Pahwa M., et al., An Evaluation of Glyphosate Use and the Risks of Non-Hodgkin Lymphoma  
13 Major Histological Subtypes in the North American Pooled Project (NAPP). Occupational  
14 Cancer Research Center, 2015 at 2-3 (“NAPP 2015”).

15 68. Annexed hereto as Exhibit 67 is a true and correct copy of Schinasi & Leon, *Non-*  
16 *Hodgkin Lymphoma and Occupational Exposure to Agricultural Pesticide Chemical Groups*  
17 *and Active Ingredients: A Systematic Review and Meta-Analysis*, 11 INT. J. ENVIRON. RES.  
18 PUBLIC HEALTH 4, 4449-4527 (2014).

19 69. Annexed hereto as Exhibit 68 is a true and correct copy of Chang & Delzell,  
20 *Systematic review and meta-analysis of glyphosate exposure and risk of lymphohematopoietic*  
21 *cancers*, 51 J. ENVIRON. SCI. HEALTH B 6, 402-434 (2016).

22 70. Annexed hereto as Exhibit 69 is a true and correct copy of MONGLY00894004.

23 71. Annexed hereto as Exhibit 70 is a true and correct copy of MONGLY00877463.

24 72. Annexed hereto as Exhibit 71 is a true and correct copy of Gray, et al., *The*  
25 *Federal Government's Agricultural Health Study: A Critical Review with Suggested*  
26 *Improvements*, 6 HUMAN AND ECOLOGICAL RISK ASSESSMENT 1, 47-71 (2000).

27 73. Annexed hereto as Exhibit 72 is a true and correct copy of De Roos, et al., *Cancer*  
28 *Incidence among Glyphosate-Exposed Pesticide Applicators in the Agricultural Health Study*,

1 113 ENVIRON HEALTH PERSPECT. 1, 49–54 (Jan 2005).

2 74. Annexed hereto as Exhibit 73 is a true and correct copy of Blair, et al., *Impact of*  
3 *pesticide exposure misclassification on estimates of relative risks in the Agricultural Health*  
4 *Study*, OCCUP. ENVIRON. MED., published online (January 21, 2011).

5 75. Annexed hereto as Exhibit 74 is a true and correct copy of Portier, et al.,  
6 *Differences in the carcinogenic evaluation of glyphosate between the International Agency for*  
7 *Research on Cancer (IARC) and the European Food Safety Authority (EFSA)* (2015).

8 76. Annexed hereto as Exhibit 75 is a true and correct copy of a June 21, 2014 email  
9 sent to Dr. Michael Alavanja.

10 77. Annexed hereto as Exhibit 76 is a true and correct copy of Alavanja, *Non-*  
11 *Hodgkin Lymphoma Risk and Insecticide, Fungicide and Fumigant Use in the Agricultural*  
12 *Health Study*, PLoS ONE 9(10): e109332 (2014).

13 78. Annexed hereto as Exhibit 77 is a true and correct copy of a February 27, 2014  
14 email among AHS investigators regarding NHL manuscript rejected by IJC.

15 79. Annexed hereto as Exhibit 78 is a true and correct copy of Heltshe, et al., *Using*  
16 *multiple imputation to assign pesticide use for nonresponders in the follow-up questionnaire in*  
17 *the Agricultural Health Study*, 22 J EXPO SCI ENVIRON EPIDEMIOL. 4, 409–416 (July 2012).

18 80. Annexed hereto as Exhibit 79 is a true and correct copy of Rothman, K.J., *Six*  
19 *Persistent Research Conceptions*, 29 J. Gen. Intern. Med 7, 1060-64, 1063 (2014).

20 81. Annexed hereto as Exhibit 80 is a true and correct copy of Deposition Transcript  
21 and Exhibits of Dr. Chadi Nabhan (Aug. 23, 2017).

22 82. Annexed hereto as Exhibit 81 is a true and correct copy of Defendant's Responses  
23 to Request for Admission (May 18, 2017).

24 83. Annexed hereto as Exhibit 82 is a true and correct copy of Vrijheid, M., et al., *The*  
25 *Effects of Recall Errors and of Selection Bias in Epidemiologic Studies of Mobile Phone Use*  
26 *and Cancer Risk*, 16 J. OF EXPOSURE SCI. & ENVIRON. EPID. 4, 371-384, 372 (2006).

27 84. Annexed hereto as Exhibit 83 is a true and correct copy of the Briefing for  
28 Governing Council Members on IARC evaluation of glyphosate.

1 85. Annexed hereto as Exhibit 84 is a true and correct copy of MONGLY06385823.

2 86. Annexed hereto as Exhibit 85 is a true and correct copy of MONGLY02142251.

3 87. Annexed hereto as Exhibit 86 is a true and correct copy of MONGLY02431080.

4 88. Annexed hereto as Exhibit 87 is a true and correct copy of MONGLY02155826.

5 89. Annexed hereto as Exhibit 88 is a true and correct copy of MONGLY00888353.

6 90. Annexed hereto as Exhibit 89 is a true and correct copy of MONGLY01839476.

7 91. Annexed hereto as Exhibit 90 is a true and correct copy of MONGLY03737014.

8 92. Annexed hereto as Exhibit 91 is a true and correct copy of MONGLY07080361.

9 93. Annexed hereto as Exhibit 92 is a true and correct copy of the February 24, 2017  
10 Hearing Transcript.

11 94. Annexed hereto as Exhibit 93 is a true and correct copy of MONGLY00896493.

12 95. Annexed hereto as Exhibit 94 is a true and correct copy of the Revised Expert  
13 Report of Dr. Christopher Portier.

14 96. Annexed hereto as Exhibit 95 is a true and correct copy of the Deposition  
15 Transcript and Exhibits of Dr. Christopher Portier (Sept. 5, 2017).

16 97. Annexed hereto as Exhibit 96 is a true and correct copy of the Expert Rebuttal  
17 Report of Dr. Christopher Portier.

18 98. Annexed hereto as Exhibit 97 is a true and correct copy of Deposition Transcript  
19 and Exhibits of Dr. Thomas Rosol (Sept. 15, 2017).

20 99. Annexed hereto as Exhibit 98 is a true and correct copy of Deposition Transcript  
21 and Exhibits of Dr. Charles Jameson (Sept. 21, 2017).

22 100. Annexed hereto as Exhibit 99 is a true and correct copy of R. Maronpot, et al.,  
23 *Relevance of animal carcinogenesis findings to human cancer predictions and prevention*, 32  
24 TOXICOL PATHOL 40-8 (2004).

25 101. Annexed hereto as Exhibit 100 is a true and correct copy of D. Begley, et al.,  
26 *Finding mouse models of Human Lymphomas and Leukemia's using the Jackson Laboratory*  
27 *Mouse Tumor Biology Database*, 99 EXPERIMENTAL AND TOXICOLOGIC PATHOLOGY 533-536,  
28 534 (2015).



1           102. Annexed hereto as Exhibit 101 is a true and correct copy of J. Ward, *Lymphomas*  
2 *and Leukemias in Mice*, 57 EXPERIMENTAL AND TOXICOLOGIC PATHOLOGY 377-381 (2006).

3           103. Annexed hereto as Exhibit 102 is a true and correct copy of the Expert Report of  
4 Dr. Christopher Corcoran.

5           104. Annexed hereto as Exhibit 103 is a true and correct copy of MONGLY01041300.

6           105. Annexed hereto as Exhibit 104 is a true and correct copy of Dourson, et al.,  
7 *Update: Mode of action (MOA) for liver tumors induced by oral exposure to 1,4-dioxane*. 88  
8 REG. TOXICOLOGY AND PHARMACOLOGY 45-55 (2017).

9           106. Annexed hereto as Exhibit 105 is a true and correct copy of Dourson, et al., *Mode*  
10 *of Action Analysis for Liver Tumors from oral 1,4-dioxane exposures and evidence-based dose*  
11 *response assessment*, 68 REG. TOXICOLOGY AND PHARMACOLOGY 397-401 (2014).

12           107. Annexed hereto as Exhibit 106 is a true and correct copy of R. Wasserstein et al.,  
13 *Statement on p-values: Context, Process, and Purpose*, 70 AMER. STATISTICIAN 129 (2016)

14           108. Annexed hereto as Exhibit 107 is a true and correct copy of Greenland, S., et al.,  
15 *Statistical test, P values, confidence intervals, and power: a guide to misinterpretations*, 31  
16 EUR. J EPIDEMIOL. 337-350 (2016).

17           109. Annexed hereto as Exhibit 108 is a true and correct copy of OECD Guidance  
18 Document 116. Keenan, et al., *Best Practices for Use of Historical Control Data of*  
19 *Proliferative Rodent Lesions*, TOXICOLOGIC PATHOLOGY 679 (2009).

20           110. Annexed hereto as Exhibit 109 is a true and correct copy of Paz-y-Miño et al.,  
21 *Evaluation of DNA damage in an Ecuadorian population exposed to glyphosate*, 30 GENETICS  
22 AND MOLECULAR BIOLOGY, 2, 456–60 (2007).

23           111. Annexed hereto as Exhibit 110 is a true and correct copy of Bolognesi,  
24 *Biomonitoring of Genotoxic Risk in Agricultural Workers from Five Colombian Regions:*  
25 *Association to Occupational Exposure to Glyphosate*, 72 J TOXICOL ENVIRON HEALTH A, 15-16,  
26 986–97 (2009).

27           112. Annexed hereto as Exhibit 111 is a true and correct copy of Paz-y-Miño et al.,  
28 *Baseline determination in social, health, and genetic areas in communities affected by*

1 *glyphosate aerial spraying on the northeastern Ecuadorian border*, 26 REV ENVTL. HEALTH 45  
2 (2011).

3 113. Annexed hereto as Exhibit 112 is a true and correct copy of the Deposition  
4 Transcript and Exhibits of Dr. Matthew Ross (May 3, 2017).

5 114. Annexed hereto as Exhibit 113 is a true and correct copy of MONGLY00885224.

6 115. Annexed hereto as Exhibit 114 is a true and correct copy of MONGLY04232807.

7 116. Annexed hereto as Exhibit 115 is a true and correct copy of C. Bolognesi, et al.  
8 *The use of the lymphocyte cytokinesis-block Micronucleus assay for monitoring pesticide-*  
9 *exposed populations* 770 Mutation Research 183-203 (2016).

10 117. Annexed hereto as Exhibit 116 is a true and correct copy of the Expert Report of  
11 Dr. Jennifer Rider.

12 118. Annexed hereto as Exhibit 117 is a true and correct copy of June 17, 2015 email  
13 from Kurt Straif to Keith Solomon re: Genotoxicity of glyphosate in humans.

14 119. Annexed hereto as Exhibit 118 is a true and correct copy of Discovery Letter sent  
15 to Rosemary Stewart and James Sullivan (December 12, 2016).

16 120. Annexed hereto as Exhibit 119 is a true and correct copy of an Email chain  
17 between Plaintiffs' counsel and Defendant's counsel re: Letter Re Rodent Carcinogenicity  
18 Studies.

19 121. Annexed hereto as Exhibit 120 is a true and correct copy of C. Alvarez-Moya, et  
20 al. *Comparison of the in vivo and in vitro genotoxicity of glyphosate isopropylamine salt in*  
21 *three different organisms*. Genetics and Molecular Biology, 37, 1, 105-110 (2014).

22 122. Annexed hereto as Exhibit 121 is a true and correct copy of an Email chain  
23 between David Wool, Heather Pigman and Erica Klenicki re Dr. Goodman's References for  
24 Ames GBF Data Set.

25 123. Annexed hereto as Exhibit 122 is a true and correct copy of the Deposition  
26 Transcript and Exhibits of Dr. Warren Foster (September 15, 2017).

27 124. Annexed hereto as Exhibit 123 is a true and correct copy of EPAHQ\_005644.

28 125. Annexed hereto as Exhibit 124 is a true and correct copy of the Deposition

1 Transcript and Exhibits of Dr. Christopher Corcoran (September 20, 2017).

2 I hereby declare under penalty of perjury that the facts set forth herein are true and  
3 correct.

4 Executed this 27<sup>th</sup> day of October, 2017.

5  
6 /s/ Aimee Wagstaff  
7 Aimee Wagstaff, SBN 278480  
8 ANDRUS WAGSTAFF, PC  
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*Co-Lead Plaintiffs' Counsel*  
*For MDL 2741*