

EXHIBIT 121



Kellie Johnson <kellie.johnson@andruswagstaff.com>

Fwd: Dr. Goodman's References for Ames GBF Data Set

David Wool <david.wool@andruswagstaff.com>
To: Kellie Johnson <kellie.johnson@andruswagstaff.com>

Fri, Oct 27, 2017 at 10:31 AM

----- Forwarded message -----

From: **Klenicki, Erica** <EKlenicki@hollingsworthllp.com>
Date: Wed, Oct 18, 2017 at 2:35 PM
Subject: RE: Dr. Goodman's References for Ames GBF Data Set
To: David Wool <david.wool@andruswagstaff.com>
Cc: "Pigman, Heather" <HPigman@hollingsworthllp.com>, "aimee.wagstaff@andruswagstaff.com" <aimee.wagstaff@andruswagstaff.com>, "rgreenwald@weitzlux.com" <rgreenwald@weitzlux.com>, "mmiller@millerfirmllc.com" <mmiller@millerfirmllc.com>

David,

Additional study summaries are contained in #384 (e.g. Njagi and Gopalan 1980). As Heather stated below, everything that Dr. Goodman considered is on the materials considered lists provided to plaintiffs.

Erica



Erica T. Klenicki

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From: David Wool [<mailto:david.wool@andruswagstaff.com>]
Sent: Wednesday, October 18, 2017 11:47 AM
To: Klenicki, Erica
Cc: Pigman, Heather; aimee.wagstaff@andruswagstaff.com; rgreenwald@weitzlux.com; mmiller@millerfirmllc.com
Subject: Re: Dr. Goodman's References for Ames GBF Data Set

Thanks Erica,

However, all of the studies summarized in reference 187 are included in the EPA table in Appendix 1 of Dr. Goodman's report. Dr. Goodman's report states that he "reviewed the underlying study reports for 38 Ames tests, as well as relevant study summaries for **at least 12 additional** Ames tests, conducted with GBFs." You provided a list of 18 references, and if we count 187 as a study summary (even though the GBF Ames tests it describes could not in any way be considered "additional" as they are included in Appendix 1) that still does not account for the entirety of the data set. I'm not trying to be difficult but I believe we are entitled to know the entirety of the data set that Dr. Goodman relied upon.

Thanks,

On Tue, Oct 17, 2017 at 10:19 AM, Klenicki, Erica <EKlenicki@hollingsworthllp.com> wrote:

Hi David,

#187 contains multiple study summaries.

Thanks,
Erica

From: David Wool [mailto:david.wool@andruswagstaff.com]

Sent: Friday, October 13, 2017 2:10 PM

To: Pigman, Heather

Cc: Klenicki, Erica;

aimee.wagstaff@andruswagstaff.com; rgreenwald@weitzlux.com; mmiller@millerfirmllc.com

Subject: Re: Dr. Goodman's References for Ames GBF Data Set

Thanks Heather,

I believe we are still missing one citation. There should be 19 total and you provided 18 references.

Thanks,

On Fri, Oct 13, 2017 at 10:46 AM, Pigman, Heather <HPigman@hollingsworthllp.com> wrote:

David –

All of the materials Dr. Goodman considered are on the materials considered lists provided to plaintiffs. As discussed at his deposition, these include underlying study reports (where available), published

studies, and summaries of studies, many of which are in the published literature as supplemental materials to published reviews. Beyond the studies and study summaries listed in Appendix 1, Dr. Goodman reviewed #s 132, 187, 213, 256, 257, 258, 259, 260, 271, 286, 311, 353, 354, 373, 374, 375, 376, 382 on his supplemental MCL. Note that there is some overlap between underlying study reports and study summaries, and some the some of the underlying studies are Ames tests on surfactants.

Heather



Heather A. Pigman

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From: David Wool
Sent: Monday, October 09, 2017 4:37 PM
To: Pigman, Heather
Cc: Aimee Wagstaff; Greenwald, Robin; Michael Miller
Subject: Dr. Goodman's References for Ames GBF Data Set

Hi Heather,

As you are aware, Dr. Goodman was questioned at deposition about the studies contained within the Ames/bacteria data set for GBFs (page 18 and appendix 1 of his report). Dr. Goodman reviewed 38 ames tests and 12 additional study summaries, however, the EPA table listed in appendix 1 only accounts for 31 studies. Thus, there are 7 additional studies and 12 summaries for which we do not have citations. Because Dr. Goodman was unable to answer in the context of the deposition I'm following up now. We ask that you provide us with a list of the 19 additional studies/summaries that Dr. Goodman relied upon in forming these opinion by close of business this Thursday. You can reference the supplemental reliance list number where the study can be found if that is easier.

Thanks,

--

David J. Wool, Esq.

Attorney

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