

1 **HOLLINGSWORTH LLP**
 2 Joe G. Hollingsworth (*pro hac vice*)
 3 Eric G. Lasker (*pro hac vice*)
 4 Heather A. Pigman (*pro hac vice*)
 5 1350 I Street, N.W.
 6 Washington, DC 20005
 7 Tel.: (202) 898-5800
 8 Fax: (202) 682-1639
 9 Email: jhollingsworth@hollingsworthllp.com
 10 elasker@hollingsworthllp.com
 11 hpigman@hollingsworthllp.com

12 *Attorneys for Defendant*
 13 *MONSANTO COMPANY*

14 UNITED STATES DISTRICT COURT
 15 NORTHERN DISTRICT OF CALIFORNIA

16 IN RE: ROUNDUP PRODUCTS
 17 LIABILITY LITIGATION

MDL No. 2741

Case No. 3:16-md-02741-VC

18 This document relates to:

19 ALL ACTIONS

Hearing Date: March 5, 2018
Time: 9:00 a.m.

20 **MONSANTO COMPANY’S NOTICE OF SUPPLEMENTAL AUTHORITY IN**
 21 **SUPPORT OF ITS *DAUBERT* AND SUMMARY JUDGMENT MOTION**
 22 **BASED ON FAILURE OF GENERAL CAUSATION PROOF**

1 **TO THE COURT AND EACH PARTY AND THE ATTORNEY OF**
 2 **RECORD FOR EACH PARTY:**

3 Monsanto Company (“Monsanto”) and its counsel submit this Notice of Supplemental
 4 Authority in support of its *Daubert* and Summary Judgment Motion Based on Failure of General
 5 Causation Proof, ECF No. 545 (“Opening Brief”), its Reply Memorandum of Points and
 6 Authorities in Support of its *Daubert* and Summary Judgment Motion Based on Failure of General
 7 Causation Proof and Opposition to Plaintiffs’ *Daubert* Motion To Strike Certain Opinions of
 8 Monsanto Company’s Expert Witnesses, ECF No. 681 (“Reply Brief”), and its Supplemental
 9 Memorandum of Points and Authorities Regarding Andreotti, Et Al., *Glyphosate Use and Cancer*
 10 *Incidence in the Agricultural Health Study*, Journal of the National Cancer Institute (2018) in
 11 Support of its *Daubert* and Summary Judgment Motion, ECF No. 1137 (“Supplemental Brief”).
 12 Attached hereto as Exhibit A is a ruling issued today by the United States Court of Appeals for the
 13 Fourth Circuit in the *In re Lipitor (Atorvastatin Calcium) Mktg., Sales Prac., and Prod. Liab.*
 14 *Litig.*, No. 17-1140 (4th Cir. June 12, 2018), affirming the district court’s decision to award
 15 summary judgment to the defendant manufacturer against all plaintiffs in the MDL on general
 16 causation after excluding the testimony of plaintiffs’ expert witnesses. *Id.* at 6. This ruling is
 17 relevant to issues addressed in Monsanto’s Opening Brief at pages 24-29, 37, and 40, the Reply
 18 Brief at pages 21-22, and 26-29, and the Supplemental Brief at page 15.

19 DATED: June 12, 2018

Respectfully submitted,

20 /s/ Joe G. Hollingsworth
 21 Joe G. Hollingsworth (*pro hac vice*)
 22 (jhollingsworth@hollingsworthllp.com)
 23 Eric G. Lasker (*pro hac vice*)
 24 (elasker@hollingsworthllp.com)
 25 Heather A. Pigman (*pro hac vice*)
 26 (hpigman@hollingsworthllp.com)
 27 HOLLINGSWORTH LLP
 1350 I Street, N.W.
 Washington, DC 20005
 Telephone: (202) 898-5800
 Facsimile: (202) 682-1639

Attorneys for Defendant
 MONSANTO COMPANY