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17 MONSANTO COMPANY

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **COUNTY OF SAN FRANCISCO**

21 DEWAYNE JOHNSON,
22 Plaintiff,

23 vs.

24 MONSANTO COMPANY,
25 Defendant.

Case No. CGC-16-550128

DECLARATION OF SANDRA A. EDWARDS IN SUPPORT OF DEFENDANT MONSANTO COMPANY'S OPPOSITION TO PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE OF COMPLAINTS FILED AGAINST MONSANTO

Honorable Judge Suzanne R. Bolanos

Department: 504

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I, Sandra A. Edwards, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Farella Braun + Martel LLP, attorneys of record for Monsanto Company (“Monsanto”). I submit this Declaration in support of Monsanto’s Opposition to Plaintiff’s Request for Judicial Notice of Complaints Filed Against Monsanto.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the June 20, 2018 hearing transcript in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on June 25, 2018, at San Francisco, California.



Sandra A. Edwards

Exhibit 1

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF SAN FRANCISCO

3

4 DEWAYNE JOHNSON,

5 Plaintiff,

6 vs. Case No. CGC-16-550128

7 MONSANTO COMPANY, et al.,

8 Defendants.

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11 VOLUME II

12

13 Proceedings June 20, 2018, at 10:22 a.m.

14 before the Honorable Suzanne R. Bolanos.

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23 REPORTED BY:

24 Mary Hogan, CSR No. 05386

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2:05PM 1 Trial Court, some of which he said is denied
2:05PM 2 without prejudice.

2:05PM 3 This is not one of them. This is one
2:05PM 4 where there was a tentative ruling, formal
2:05PM 5 argument, and a final ruling.

2:05PM 6 He had very well reasoned a succinct
2:05PM 7 opinion which I think Your Honor already stated
2:05PM 8 you are aware of. There is nothing about a lack
2:06PM 9 of foundation or any concerns about the evidence
2:06PM 10 coming in.

2:06PM 11 Judge Karnow ruled that these
2:06PM 12 complaints would be treated as notice to Monsanto
2:06PM 13 of the alleged connection between glyphosate and
2:06PM 14 the injury at issue in this case.

2:06PM 15 Monsanto made the arguments they are
2:06PM 16 making today. Judge Karnow said this shouldn't
2:06PM 17 block Plaintiffs from also introducing the facts
2:06PM 18 of the six or seven cases.

2:06PM 19 I believe there may be more than

2:06PM 20 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED] and I am happy to go on if the
2:06PM 25 Court likes with more substantive topics.

[REDACTED]

2:13PM 14 MR. WISNER: Fair enough, Your Honor.

2:13PM 15 I just want to be clear.

2:13PM 16 They can attack our experts for the
2:13PM 17 amount of money they have made but they can't say
2:13PM 18 the basis for that money. That's what I
2:13PM 19 understand this ruling is saying and how is that
2:13PM 20 fair?

2:13PM 21 THE COURT: It depends on how the
2:13PM 22 question is phrased.

2:13PM 23 The witness may answer the question
2:13PM 24 and needs to know that I've excluded reference to
2:13PM 25 4000 cases, but if a Defense lawyer asks the

3:01PM 1 I, the undersigned, a Certified
3:01PM 2 Shorthand Reporter of the State of California, do
3:01PM 3 hereby certify:

3:01PM 4 That the foregoing proceedings were
3:01PM 5 taken before me at the time and place herein set
3:01PM 6 forth; that any witnesses in the foregoing
3:01PM 7 proceedings, prior to testifying, were duly sworn;
3:01PM 8 that a record of the proceedings was made by me
3:01PM 9 using machine shorthand which was thereafter
3:01PM 10 transcribed under my direction; that the foregoing
3:01PM 11 transcript is a true record of the proceedings.

3:01PM 12 I further certify that I am neither
3:01PM 13 financially interested in the action nor a
3:01PM 14 relative or employee of any attorney or party to
3:01PM 15 this action.

3:01PM 16 IN WITNESS WHEREOF, I have this date
3:01PM 17 subscribed my name.

3:01PM 18

3:01PM 19 Dated: June 20, 2018

3:01PM 20

3:01PM 21 Mary Hogan

10:49AM 22 CSR No. 05386

9:26AM 23

4:49PM 24