

EXHIBIT 1



November 20, 2018

VIA EMAIL

Kirby Griffis
Hollingsworth, LLP
1350 Street NW
Washington, DC 20005

Re: Expert Disclosures in Hardeman v. Monsanto (3:16-cv-525), Stevick v. Monsanto (3:16-cv-2341), and Gebeyehou v. Monsanto (3:16-cv-5813)

Dear Counsel:

Pursuant to Pretrial Order 53 and Fed. R. Civ. P. 26(a)(2), Plaintiffs in the above-captioned cases provide the following expert designations and disclosures. Plaintiffs may amend and/or supplement these designations should any rebuttal opinions be required following Monsanto's expert designations. Also, as discovery is ongoing, there is a possibility that new non-retained third-party experts are identified and deposed prior to trial. Plaintiffs reserve the right to designate such testimony pursuant to Fed. R. Civ. P. 26(a)(c)(C) at a later date, once that testimony becomes available.

RULE 26(a)(2)(B) DESIGNATIONS

Christopher Portier, PhD

Dr. Portier will testify on issues of general causation regarding whether exposure to glyphosate and/or glyphosate-based formulated products can cause cancer, and particularly non-Hodgkin lymphoma, including in the areas of toxicology, genotoxicity, biostatistics, epidemiology, and the processes and methodologies encompassing the review, evaluation and assessment of chemicals as cancer hazards by the International Agency for Research on Cancer (IARC). These areas of testimony were the subject of the MDL general causation phased discovery and subsequent Daubert hearing, held on March 5 – 9 and April 4 – 6, 2018. As his

expert report and disclosure, Dr. Portier incorporates the following materials, all of which are part of the MDL record:

Revised Expert Report, served on 6/15/2017

Rebuttal Expert Report, served on 8/18/2017

Supplemental Expert Report, served on 12/21/2017

Deposition testimony dated 9/15/2017

Supplemental Deposition testimony dated 1/12/2018

Testimony provided at the Daubert hearing on March 7 and 8 and April 6, 2018.

Dr. Portier is also providing a supplemental reliance list.

Outside of Roundup litigation, Dr. Portier has not provided any other testimony since his original report in this MDL, and his billing rate has not changed.

Beate Ritz, MD, PhD

Dr. Ritz will testify on issues of general causation regarding whether exposure to glyphosate and/or glyphosate-based formulated products can cause cancer, and particularly non-Hodgkins lymphoma, including in the areas of epidemiology, toxicology and genotoxicity.

These areas of testimony were the subject of the MDL general causation phased discovery and subsequent *Daubert* hearing, held on March 5 – 9 and April 4 – 6, 2018. As her expert report and disclosure, Dr. Ritz incorporates the following materials, all of which are part of the MDL record:

Expert Report, served on 5/1/2017

Rebuttal Expert Report, served on 8/18/2017

Supplemental Expert Report, served on 12/21/2017

Deposition testimony dated 9/1/2017

Supplemental Deposition testimony dated 1/19/2018

Testimony provided at the *Daubert* hearing on March 5 and April 4, 2018.

Dr. Ritz is also providing a supplemental reliance list.

Outside of Roundup litigation, Dr. Ritz has not provided any other testimony since her original report in this MDL, and her billing rate has not changed.

Charles William Jameson, PhD

Dr. Jameson will testify on the topics related to the animal bioassays consistent with

limitations imposed by the Court in its July 10, 2018 Order. Additionally, Dr. Jameson will offer testimony concerning his factual participation in the International Agency for Research on Cancer (IARC) 112 Monograph, specifically as it relates to glyphosate, and on the IARC process in general. The basis of this factual testimony will his role as the Subgroup Chair of the Cancer in Experimental Animals during the 112 Monograph. Outside of Roundup litigation, Dr. Jameson has not provided any other testimony since his original report in this MDL, and his billing rate has not changed.

Dennis Weisenburger, MD

Dr. Weisenburger will testify on issues of general causation regarding whether exposure to glyphosate and/or glyphosate-based formulated products can cause cancer, and particularly non-Hodgkins lymphoma, including in the areas of epidemiology, pathology, hematopathology, and oncology. These areas of testimony were the subject of the MDL general causation phased discovery and subsequent *Daubert* hearing, held on March 7 – 8 and April 5 – 6, 2018. As his expert report and disclosure, Dr. Weisenburger incorporates the following materials, all of which are part of the MDL record:

Revised Expert Report, served on 5/1/2017

Supplemental Expert Report, served on 12/21/2017

Deposition testimony dated 9/11/2017

Supplemental Deposition testimony dated 1/22/2018

Testimony provided at the *Daubert* hearing on March 5 and 6, 2018.

Dr. Weisenburger is also providing a supplemental reliance list.

Outside of Roundup litigation, Dr. Weisenburger has not provided any other testimony since his original report in this MDL, and his billing rate has not changed.

In addition, Dr. Weisenburger will testify on issues of specific causation, including a general background on NHL, the Plaintiffs' medical histories, whether Plaintiffs' use of and exposure to Roundup is a substantial contributing factor to the Plaintiffs' NHL, the reasonableness of Plaintiffs' care, and Plaintiffs' prognosis. Dr. Weisenburger is providing specific expert reports for Plaintiffs Hardeman, Stevick and Gebeyehou relating to his specific causation opinions.

Chadi Nabhan, MD

Dr. Nabhan will testify on issues of specific causation, including a general background on NHL, the Plaintiffs' medical histories, whether Plaintiffs' use of and exposure to Roundup is a substantial contributing factor to the Plaintiffs' NHL, the reasonableness of Plaintiffs' care, Plaintiffs' prognosis. Dr. Nabhan is providing specific expert reports for Plaintiffs Hardeman, Stevick and Gebeyehou relating to his specific causation opinions.

Dr. Nabhan is also providing a supplemental reliance list.

Outside of Roundup litigation, Dr. Nabhan has not provided any other testimony since his original report in this MDL, and his billing rate has not changed.

Andrei R. Shustov, MD

Dr. Shustov will testify on issues of specific causation, including a general background on NHL, the Plaintiffs' medical histories, whether Plaintiffs' use of and exposure to Roundup is a substantial contributing factor to the Plaintiffs' NHL, the reasonableness of Plaintiffs' care, and Plaintiffs' prognosis. Dr. Shustov is providing specific expert reports for Plaintiffs Hardeman, Stevick and Gebeyehou relating to his specific causation opinions.

William Sawyer, PhD

Dr. Sawyer will testify on issues concerning the mechanism of absorption of glyphosate-based formulations through the skin and other exposure pathways and the effect of wearing personal protective equipment on the exposure levels. Dr. Sawyer will also testify on issues of specific causation, including the comparability of Plaintiffs' exposure with the exposure data from epidemiological studies, for Plaintiff Elaine Stevick. Dr. Sawyer is providing an expert report for Plaintiffs Hardeman, Stevick and Gebeyehou relating to his general absorption opinions and an expert report relating to his specific causation opinions as they relate to Plaintiff Stevick.

Charles Benbrook, PhD

Dr. Benbrook will testify about the regulatory history of glyphosate and glyphosate-based formulations, including Roundup; the interaction between EPA and Monsanto in relation to the registration and re-registration of Roundup formulations; the labeling responsibilities of pesticide manufacturers under federal regulation, including Monsanto's obligations regarding the Roundup label; the stewardship obligations of a pesticide manufacturer, including Monsanto's obligations

regarding the stewardship of Roundup; whether certain publications related to glyphosate safety were ghost authored by Monsanto and, generally, whether Monsanto's publication planning and conduct comport with prevailing ethical and scientific/academic standards; and the sufficiency of the Roundup label during all relevant times. Dr. Benbrook is providing an expert report for Plaintiffs Hardeman, Stevick and Gebeyehou.

Robert W. Johnson and James A. Mills

Mr. Johnson and Mr. Mills are economists who will testify about Monsanto's financial condition, net worth, and its ability to pay punitive damages. Johnson and Mills are providing an expert report for Plaintiffs Hardeman, Stevick and Gebeyehou.

RULE 26(a)(2)(C) DESIGNATIONS

Aaron Blair, PhD

As a non-retained, third-party expert, Dr. Blair will offer testimony concerning the epidemiology of glyphosate and cancer, specifically non-Hodgkin lymphoma. His testimony was taken on March 20, 2017. He will also offer testimony concerning the effect of the Agricultural Health Study on the conclusions reached by the International Agency for Research on Cancer (IARC) regarding glyphosate, i.e., that it would not change the IARC classification. He will also testify that IARC is a reputable and reliable institution and that IARC followed proper scientific guidelines in rendering its classification of glyphosate. The factual basis of his testimony will be his 30+ years working in occupational epidemiology and his chairing of the 112 IARC Monograph program.

Matthew Ross, PhD

As a non-retained, third-party expert, Dr. Ross will offer testimony concerning the mechanism through which glyphosate causes cancer, specifically glyphosate propensity to induce oxidative stress and cause genotoxicity. His testimony was taken on May 3, 2017. He will also offer testimony concerning the conclusions reached by the International Agency for Research on Cancer (IARC) regarding glyphosate, will testify that IARC is a reputable and reliable institution, and that IARC followed proper scientific guidelines in rendering its classification of glyphosate. The factual basis of his testimony will be his 20+ years working in molecular toxicology and his participation in the 112 IARC Monograph program.

Treating Physicians

All plaintiffs may call one or more of their treating healthcare providers to provide both factual and opinion testimony at trial. The identity of these healthcare providers can be found in the medical records and Plaintiff Fact Sheets which have been provided to counsel for Monsanto. The subject matter of their testimony is expected to be the diagnosis and treatment of the respective Plaintiffs' NHL. These healthcare providers are expected to testify consistently with their entries in the Plaintiffs' medical records.

DOCUMENTS ATTACHED

Attached are the following materials relating to the above-referenced expert designations:

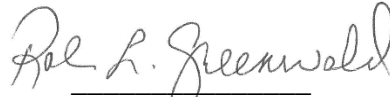
1. Dr. Portier
 - a. Updated Reliance List
2. Dr. Ritz
 - a. Updated Reliance List
3. Dr. Nabhan
 - a. Expert report for Plaintiff Hardeman
 - b. Reliance List for Plaintiff Hardeman
 - c. Expert report for Plaintiff Stevick
 - d. Plaintiff Stevick – Medical Expenses Paid
 - e. Plaintiff Stevick – Medical Records from Central Support
 - f. Expert report for Plaintiff Gebeyehou
 - g. Updated Reliance List
 - h. CV
4. Dr. Weisenburger
 - a. Expert report for Plaintiff Hardeman
 - b. Reliance List for Plaintiff Hardeman
 - c. Expert report for Plaintiff Stevick
 - d. Expert report for Plaintiff Gebeyehou
 - e. Updated Reliance List
 - f. CV
5. Dr. Shustov
 - a. Expert report for Plaintiff Hardeman
 - b. Expert report for Plaintiff Stevick
 - c. Expert report for Plaintiff Gebeyehou
 - d. Reliance List
 - e. CV
 - f. Prior Testimony and Fee Schedule

6. Dr. Sawyer
 - a. Expert report for Plaintiffs Hardeman, Stevick, and Gebeyehou
 - b. Reliance List
 - c. CV
 - d. Prior Testimony
 - e. Fee Schedule

7. Dr. Benbrook
 - a. Expert report for Plaintiffs Hardeman, Stevick, and Gebeyehou (includes his CV, Prior Testimony and Fee Schedule)

8. Robert W. Johnson and James A. Mills
 - a. Expert report for Plaintiffs Hardeman, Stevick, and Gebeyehou
 - b. Robert W. Johnson CV
 - c. Robert W. Johnson Prior Testimony
 - d. James A. Mills CV
 - e. James A. Mills Prior Testimony

Regards,



Robin Greenwald

/s/ Aimee Wagstaff

Aimee Wagstaff

/s/ Mike Miller

Michael Miller

*Co-Lead Counsel for Plaintiffs
in MDL No. 2741*