

EXHIBIT 2

Affidavit of Beverly T. Randles

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

BADER FARMS, INC. and)	
BILL BADER,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:16-cv-00299
)	
MONSANTO CO.,)	
)	
Defendant.)	

AFFIDAVIT OF BEVERLY T. RANGLES

1. My name is Beverly T. Randles and I reside in Kansas City, Missouri. I certify that I am over eighteen years of age. I am competent to attest to the factual matters set forth in this Affidavit. If called as a witness in this matter, I could and would testify to the matters set forth in this Affidavit from my own personal knowledge and recollection.

2. I am a partner in the law firm of Randles & Splittgerber, LLP, a law firm in Kansas City, Missouri. I also am an attorney for Plaintiffs Bader Farms, Inc. and Bill Bader (“Plaintiffs”) in the above-captioned matter.

3. On November 23, 2016, Plaintiffs filed their Petition against Defendant Monsanto Company (“Defendant Monsanto”) in the Circuit Court of Dunklin County, Missouri.

4. Subsequent to the filing of Plaintiffs’ Petition, I learned from an expert witness who Plaintiffs retained in this matter, Dr. Ford L. Baldwin, Ph. D., that at an Arkansas State Plant Board hearing, a farmer testified under oath that his Monsanto representative told him to spray his Xtend seeds with dicamba.

5. Subsequent to learning about such testimony from Dr. Baldwin, I also learned from reading news articles about dicamba drift in Southeast Missouri and Arkansas that testimony had been given to the Arkansas State Plant Board establishing that Defendant Monsanto's representatives made a practice of directing farmers who purchased its Xtend seeds to illegally spray dicamba to protect their crops. *See Exhibit 2A – Working 4 You: Illegal Chemical Use Damages Soybeans.*

6. Shortly thereafter, in mid-January 2017, I sought out the transcript that established that testimony.

7. On or around January 26 or 27, 2017, I received the transcript of a hearing conducted on July 8, 2016 before the Arkansas State Plant Board where a Missouri farmer, Donald Masters, who has farmland in Dunklin County, Missouri and in Arkansas, testified that a Monsanto representative told him to spray dicamba on his Xtend crops.

SWORN SIGNATURE

STATE OF MISSOURI)
)
COUNTY OF *Clay*) ss.:

I declare under the penalty of perjury that the foregoing is true and correct.

Beverly T. Randles
Beverly T. Randles

4-27-17
Date

SWORN TO AND SUBSCRIBED before me, a Notary public, on this 27th day of April, 2017, the above individual, known to me, and executed the above affidavit and acknowledged the same as his own free act and deed.

Matthew Whitney
Notary Public

