

EXHIBIT 8

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5 **IN THE UNITED STATES DISTRICT COURT**
6 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

7 **IN RE: ROUNDUP PRODUCTS LIABILITY**
LITIGATION

8 **THIS DOCUMENT RELATES TO:**

9 *Gerard Cervantes v. Monsanto Company*

10 **Case No. 3:19-cv-03015-VC**

Master File No. 3:16-MD-02741-VC
MDL No. 2741

VINCE CHHABRIA
U.S. DISTRICT JUDGE

11 **PLAINTIFF'S R. 26 SPECIFIC CAUSATION EXPERT DISCLOSURES**

12 Pursuant to Pretrial Orders 150, the Court's Order dated December 9, 2020, and Fed. R.
13 Civ. P. 26(a)(2), Plaintiff, Gerard Cervantes provides the following Designation of Disclosure of
14 Case Specific Expert Witnesses and persons who may provide expert testimony specific to
15 Plaintiff's case pursuant to Rule 702 of the Federal Rules of Evidence. Plaintiff's disclosure of
16 case specific expert witnesses is subject to the following reservation of rights:

- 17 1. The right to supplement or amend this witness list based upon any rulings of the
18 Court or any other court decisions that affect the scope of evidence in this trial.

- 1 2. The right to withdraw the designation of any expert prior to testimony, and
2 positively aver that such previously designated will not be called as a witness to
3 trial.
- 4 3. The right to amend or supplement expert opinions based on additional discovery
5 including updated medical records, deposition testimony, medical literature, or
6 scientific studies.
- 7 4. The right to supplement the references considered and/or relied upon by
8 Plaintiff's designated experts inn order to address newly available information or
9 literature.
- 10 5. The right to elicit expert testimony at trial from any qualified person, including
11 Plaintiff's treating health care providers, as permitted under the applicable rules of
12 evidence and procedure.
- 13 6. Plaintiff's expert witnesses, as identified below, may testify about their skill,
14 knowledge, experience, training, and education in their respective fields, the
15 relevant medical and scientific literature; the techniques and methods in their field
16 of practice; and the description and nature of their practice. They may testify
17 about their publications, presentations, research and all matters detailed in their
18 respective curriculum vitae. They may testify based on facts or data perceived by
 or made known to them at or before trial that have been properly disclosed under
 the applicable rules of evidence and procedure. They may employ demonstrative
 and visual aids.

- 1 7. Plaintiff reserves the right to offer supplemental expert opinions based on updated
2 or new information relative to the litigation. Plaintiff reserves the right for their
3 expert witnesses to update the literature upon which the witnesses rely in support
4 of their opinions.
- 5 8. Plaintiff incorporates all prior reports, if any, the experts have issued in MDL
6 2741 or any other state or federal litigation.
- 7 9. By identifying the expert witness named below, Plaintiff does not intend to waive
8 any objections to deposition testimony, exhibits, or other evidence or argument.
9 Plaintiff reserves the right to call and elicit testimony from any and all of
10 Defendant's current or former employees who have been disclosed as a witness
11 and/or offered testimony and/or have been identified in discovery.
- 12 10. Plaintiff reserves the right to call and elicit testimony at trial from any and all of
13 Defendant's retained or non-retained expert witnesses.

14 **PLAINTIFF'S CASE SPECIFIC EXPERT DESIGNATIONS**

15 **Ron D. Schiff, M.D. Ph.D**
16 **6625 Stoning Drive**
17 **Tampa, Florida 33647**

18 Dr. Schiff will testify on issues of specific causation regarding whether exposure to
glyphosate and/or glyphosate-based formulated products was a substantial factor contributing to
Plaintiff developing non-Hodgkin's lymphoma, specifically Large B-Cell Lymphoma. Dr.
Schiff's opinions will encompass the areas of oncology and hematology as well as toxicology,
genotoxicity, and epidemiology. Plaintiff hereby incorporates by reference, Dr. Schiff's expert
report.

1 Dr. Schiff's's hourly rate is \$600.00. Dr. Schiff has not been deposed with respect to his
2 specific causation opinions being offered in this case. A copy of Dr. Schiff's curriculum vitae
3 will be provided to counsel electronically.

4 **Dennis Weisenburger, MD**
5 **1500 E. Duarte Road**
6 **Duarte, CA 91010**

7 Dr. Weisenburger will testify on issues of specific causation and will testify regarding the
8 causes of cancer, causes of non-Hodgkin lymphoma, whether exposure to glyphosate and/or
9 glyphosate-based formulated products can cause cancer, and particularly non-Hodgkin
10 lymphoma, including testimony in the areas of epidemiology, pathology, hematopathology,
11 cellular changes with the development of non-Hodgkin lymphoma and cancer development.

12 Plaintiff hereby incorporates by reference, Dr. Weisenburger's expert report.

13 Dr. Weisenburger's hourly rate is \$750.00. Dr. Weisenburger has not been deposed with
14 respect to his specific causation opinions being offered in this case. A copy of Dr.
15 Weisenburger's curriculum vitae will be provided to counsel electronically.

16 **Charles Benbrook, Ph.D.**
17 **90063 Troy Rd.**
18 **Enterprise, OR 97828**

19 Dr. Benbrook will testify on issues of specific causation and will testify regarding the
20 Roundup application and its impact, the EPA's evaluation of glyphosate, Roundup oncongenicity
21 and carcinogenicity, bio/dynamics oncogenicity, Monsanto, EPA and IARC assessments of
22 glyphosate and Roundup genotoxicity, Monsanto's failure to adequately estimate applicator

1 exposures, EPA registration standards, and IARC classifications. Plaintiff hereby incorporates by
2 reference, Dr. Benbrook's expert report.

3 Dr. Benbrook's hourly rate is \$450.00. Dr. Benbrook has not been deposed with respect
4 to his specific causation opinions being offered in this case. A copy of Dr. Benbrook's
5 curriculum vitae will be provided to counsel electronically.

6 **William R. Sawyer, Ph.D**
7 **6450 Pine Avenue**
8 **Sanibel, Florida 33957**

9 Dr. Sawyer will testify on issues of specific causation and will testify regarding forensic
10 toxicology, occupational and environment risk assessment of Roundup usage, evaluation of the
11 amount of Roundup exposure, and how protective gear affects the amount of exposure. Plaintiff
12 hereby incorporates by reference, Dr. Sawyer's expert report.

13 Dr. Sawyer's hourly rate is \$750.00. Dr. Sawyer has not been deposed with respect to his
14 specific causation opinions being offered in this case. A copy of Dr. Sawyer's curriculum vitae
15 will be provided to counsel electronically.

16 Dated January 22, 2021

17 Respectfully submitted,

18 By: /s/ Rebecca Fredona

Rebecca Fredona

Ken Moll

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COUNSEL FOR PLAINTIFF

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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2021, a true and correct copy of the foregoing document was served upon the parties below via electronic mail:

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/s/ Rebecca Fredona