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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL NO. 2741

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

THIS DOCUMENT RELATES TO:

Ramirez, et al. v. Monsanto Co., Case No.
3:19-cv-02224

**ADMINISTRATIVE MOTION (1) FOR
EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
SETTLEMENT, (2) FOR EXTENSION OF
PAGE LIMIT, AND (3) TO RESCHEDULE
THE HEARING DATE FOR THE MOTION
FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

Under Local Rules 7-11 and 6-3, the Class Plaintiffs move for an Order (1) extending by 20 days, to March 31, 2021, the deadline to file a Reply in Support of the Motion for Preliminary Approval of Proposed Class Settlement, Doc. 12509; (2) granting leave to file a Reply up to 100 pages in length; and (3) rescheduling the Preliminary Approval Hearing from March 31, 2021, to

May 13, 2021, or a date convenient for the Court. Defendant Monsanto Co. joins this Motion. In support, Plaintiffs state:

1. On February 3, 2021, Plaintiffs filed a motion for preliminary approval of a class settlement. Doc. 12531. On February 12, the Court issued an order permitting opposition briefs to be filed on March 4, making any reply brief due March 11, setting page limits for oppositions and any consolidated reply of 50 pages per brief, and setting the hearing on the motion for March 21, 2021. Doc. 12581. On March 2, the Court issued an order requiring any amicus briefs be filed by March 5. Doc. 12652.

2. Nine separate objections to the motion for preliminary approval were filed, along with four amicus briefs opposing the proposed class settlement. Docs. 12657, 12664, 12673, 12676, 12677, 12678, 12679, 12681-1, 12682, 12683, 12687-1, 12693-1, 12700-1. These filings totaled more than 300 pages, in addition to more than 400 pages of attached declarations and exhibits. The objections and amicus briefs raise a host of issues, including, among other things, the overall fairness of the settlement, multiple constitutional attacks on the settlement and proposed advisory science panel, technical challenges to the notice program, attacks on the fairness of the compensation fund, and challenges to predominance, superiority, and the adequacy of class (and subclass) counsel.

3. More than one week—and 50 pages—is needed to respond adequately and fully to these objections. In addition, there are some issues that can perhaps be clarified or possibly even resolved without this Court having to rule. Granting the request for additional time and pages for the filing of a consolidated reply will also benefit the proposed class by ensuring that all objections are fully explored and addressed before the Court rules on the motion for preliminary approval. For these reasons, Plaintiffs move the Court to extend the deadline for filing a consolidated reply from March 11 to March 31 and to increase the page limit for the reply to 100 pages.

4. Given the considerable length of the filings, Plaintiffs also move the Court to reschedule the motion hearing from March 31 to May 13, or such date as is convenient for the

Court. This will provide the Court (and parties) with adequate time to consider all of the filings and prepare for the hearing. Importantly, the additional time before the hearing will also provide an opportunity for Plaintiffs and Monsanto to engage with objectors, amici, and amongst themselves before and after the filing of the reply to streamline or narrow the issues that need to be contested at the hearing.

5. Plaintiffs further propose the filing of a status report one week before the hearing date to detail any areas of resolution that they have reached with objectors or amici. And, again, by providing additional time for consideration of the filings by Plaintiffs and Monsanto and for engagement with objectors and amici and among the parties, extending the hearing date will also best serve the interests of the proposed class.

6. This is Plaintiffs' first request for an extension of time in this matter.

Dated: March 7, 2021

Respectfully submitted,

/s/ Elizabeth J. Cabraser

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Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that, on March 7, 2021, service of this document was accomplished pursuant to the Court's electronic filing procedures by filing this document through the ECF system.

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL NO. 2741

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

THIS DOCUMENT RELATES TO:

Ramirez, et al. v. Monsanto Co., Case No.
3:19-cv-02224

**DECLARATION OF ELIZABETH J.
CABRASER IN SUPPORT OF
ADMINISTRATIVE MOTION (1) FOR
EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
SETTLEMENT, (2) FOR EXTENSION OF
PAGE LIMIT, AND (3) TO RESCHEDULE
THE HEARING DATE FOR THE MOTION
FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

I, Elizabeth J. Cabraser, declare as follows:

1. I am a partner at the law firm of Lief, Cabraser, Heimann & Bernstein, LLP, and among proposed Class Counsel in the above-captioned matter. I am a member in good standing of the bars of California and the Northern District of California. I submit this declaration in support of the Plaintiffs' Administrative Motion (1) for Extension of Time to File Reply in Support of Motion for Preliminary Approval of Proposed Class Settlement; (2) for Extension of Page Limit; and (3) to Reschedule the Hearing Date for the Motion for Preliminary Approval of Proposed Class Settlement.

2. Under the current schedule, the consolidated reply in support of preliminary approval is due on March 11 and limited to 50 pages.

3. On March 4 and 5, nine separate objections to the motion for preliminary approval were filed, along with four amicus briefs opposing the proposed class settlement. Docs. 12657, 12664, 12673, 12676, 12677, 12678, 12679, 12681-1, 12682, 12683, 12687-1, 12693-1, 12700-1. These filings totaled more than 300 pages, in addition to more than 400 pages of attached declarations and exhibits. The objections and amicus briefs raise a host of issues,

including, among other things, the overall fairness of the settlement, multiple constitutional attacks on the settlement and proposed Science Panel, technical challenges to the notice program, attacks on the fairness of the compensation fund, and challenges to predominance, superiority, and the adequacy of class (and subclass) counsel.

4. More than one week—and 50 pages—is needed to respond adequately and fully to these objections. In addition, there are some issues that can perhaps be clarified or possibly even resolved without this Court having to rule. Granting the request for additional time and pages for the filing of a consolidated reply will also benefit the proposed class by ensuring that all objections are fully explored and addressed before the Court rules on the motion for preliminary approval. For these reasons, Plaintiffs move the Court to extend the deadline for filing a consolidated reply from March 11 to March 31 and to increase the page limit for the reply to 100 pages

5. Given the considerable length of the filings, Plaintiffs also move the Court to reschedule the motion hearing from March 31 to May 13, or such date as is convenient for the Court. This will provide the Court (and parties) with adequate time to consider all of the filings and prepare for the hearing. Importantly, the additional time before the hearing will also provide an opportunity for Plaintiffs and Monsanto to engage with objectors, amici, and amongst themselves before and after the filing of the reply to streamline or narrow the issues that need to be contested at the hearing.

6. This is Plaintiffs' first request for an extension of time in this matter.

7. Due to the press of time and the large number of opposing filers, it was not feasible to obtain a stipulation to the relief requested.

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

Executed this 7th day of March, 2021, in Sebastopol, California.

/s/ Elizabeth J. Cabraser
Elizabeth J. Cabraser

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL NO. 2741

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

THIS DOCUMENT RELATES TO:

Ramirez, et al. v. Monsanto Co., Case No.
3:19-cv-02224

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION (1) FOR
EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
SETTLEMENT, (2) FOR EXTENSION OF
PAGE LIMIT, AND (3) TO RESCHEDULE
THE HEARING DATE FOR THE MOTION
FOR PRELIMINARY APPROVAL OF CLASS
SETTLEMENT**

The Administrative Motion (1) for Extension of Time to File Reply in Support of Motion for Preliminary Approval of Proposed Class Settlement; (2) for Extension of Page Limit; and (3) to Reschedule the Hearing Date for the Motion for Preliminary Approval of Proposed Class Settlement is GRANTED. The Court orders:

1. The consolidated reply in support of the motion for preliminary approval is due no later than March 31, 2021.
2. The consolidated reply in support of the motion for preliminary approval shall not exceed 100 pages.
3. The hearing on the motion for preliminary approval currently scheduled for March 31, 2021 is stricken and rescheduled for May 13, 2021.

IT IS SO ORDERED.

Dated: _____

THE HON. VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE