

Elizabeth J. Cabraser (SBN 083151)
Robert L. Lieff (SBN 037568)
Steven E. Fineman (SBN 140335)
Andrew R. Kaufman
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
ecabraser@lchb.com

William M. Audet (SBN 117456)
AUDET & PARTNERS, LLP
711 Van Ness, Suite 500
San Francisco, CA 94102-3229
Telephone: 415.568.2555

*Counsel for Plaintiffs and the Proposed Class
(additional counsel listed below)*

James R. Dugan, II
TerriAnne Benedetto
THE DUGAN LAW FIRM, APLC
One Canal Place
365 Canal Street, Suite 1000
New Orleans, LA 70130
Telephone: 504.648.0180

Samuel Issacharoff
40 Washington Square South
Suite 411J
New York, NY 10012
Telephone: 212.998.6580

Elizabeth A. Fegan
Melissa Ryan Clark
FEGAN SCOTT LLC
150 S. Wacker Dr., 24th Fl.
Chicago, IL 60606
Telephone: 312.741.1019

**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 FOR
EXTENSION OF TIME TO FILE REPLY IN
SUPPORT OF MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
SETTLEMENT**

Under Local Rules 7-11 and 6-3, the Class Plaintiffs move for an Order extending by seven days, to April 7, 2021, the deadline to file a Reply in Support of the Motion for Preliminary Approval of Proposed Class Settlement, Doc. 12509. 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.

3. On March 9, 2021, the Court granted Plaintiffs' motion to extend the deadline for filing the reply by 20 days, to March 31, 2021. The justification for the extension was not only the need to respond to the voluminous objections, but also the opportunity to clarify or resolve areas of disagreement where possible.

4. An additional seven days will permit the parties to document amendments to the settlement already agreed do and to reflect those amendments in the reply. There is also the possibility of further progress in resolving objections. Permitting more time for engagement with objectors and amici, and potentially narrowing the issues in dispute, is in the interest of the parties, the Court, and the proposed class.

5. For these reasons, Plaintiffs move the Court to extend the deadline for filing a consolidated reply from March 31 to April 7.

6. At this time, Plaintiffs do not believe it is necessary to reschedule the hearing currently scheduled for May 12.

7. This is Plaintiffs' second request for an extension of time in this matter.

Dated: March 30, 2021

Respectfully submitted,

/s/ Elizabeth J. Cabraser
Robert L. Lieff (of counsel) (SBN 037568)

Elizabeth J. Cabraser (SBN 083151)
Kevin R. Budner (SBN 287271)
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: 415.956.1000
Facsimile: 415.956.1008
rlieff@lchb.com
ecabraser@lchb.com
kbudner@lchb.com

Steven E. Fineman (SBN 140335)
Wendy R. Fleishman
Rhea Ghosh
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
250 Hudson Street, 8th Floor
New York, NY 10013
Telephone: 212.355.9500
sfineman@lchb.com
wfleishman@lchb.com
rghosh@lchb.com

Andrew R. Kaufman
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP
222 2nd Avenue South, Suite 1640
Nashville, TN 37201
Telephone: 615.313.9000
akaufman@lchb.com

Elizabeth A Fegan
Proposed Subclass 2 Counsel
FEGAN SCOTT LLC
150 S. Wacker Dr., 24th Floor
Chicago, IL 60606
Telephone: 312.741.1019
beth@feganscott.com

Melissa Ryan Clark
FEGAN SCOTT LLC
140 Broadway, 46th Floor
New York, NY 10005
Telephone: 347.353.1150
Melissa@feganscott.com

James R. Dugan, II
TerriAnne Benedetto
Proposed Subclass 2 Counsel

David S. Scalia
THE DUGAN LAW FIRM, APLC
One Canal Place
365 Canal Street, Suite 1000
New Orleans, LA 70130
Telephone: 504.648.0180
jdugan@dugan-lawfirm.com
tbenedetto@dugan-lawfirm.com
dscalia@dugan-lawfirm.com

William M. Audet (SBN 117456)
Proposed Subclass 1 Counsel
Ling Y. Kuang (SBN 296873)
AUDET & PARTNERS, LLP
711 Van Ness, Suite 500
San Francisco, CA 94102-3229
Telephone: 415.568.2555
waudet@audetlaw.com
lkuang@audetlaw.com

Samuel Issacharoff
40 Washington Square South
Suite 411J
New York, NY 10012
Telephone: 212.998.6580
si13@nyu.edu

Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that, on March 30, 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