Ted W. Pelletier (SBN 172938) LAW OFFICE OF TED W. PELLETIER P.O. Box 394 San Anselmo, CA 94979 Tel.: (415) 720-4853 E-mail: ted@pelletierappealsandmotions.com

Counsel for Lisa Blue, individually and as current President on Behalf of National Trial Lawyers

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

Ramirez, et al. v. Monsanto Co., Case No. 3:19-cv-02224-VC Case No. 3:16-md-02741-VC

NOTICE OF JOINDER AND JOINDER IN OPPOSITION OF 93 LAW FIRMS AND 167 LAWYERS AS *AMICI CURIAE* TO MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT, APPOINTMENT OF INTERIM CLASS AND SUBCLASS COUNSEL, DIRECTION OF NOTICE UNDER FED. R. CIV. P. 23(e), SCHEDULING OF A FAIRNESS HEARING, AND STAY OF THE FILING AND PROSECUTION OF ROUNDUP-RELATED ACTIONS BY SETTLEMENT CLASS MEMBERS

The Honorable Vince Chhabria Date: March 31, 2021 Time: 10:00 am Courtroom 4 – 17th Floor

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Lisa Blue, individually and as current President of National Trial Lawyers ("NTL"), on behalf of its approximately 14,000 members, hereby joins in and adopts the "Opposition of 93 Law Firms and 167 Lawyers as *Amici Curiae* to Motion For Preliminary Approval of Proposed Class Settlement. . .", filed in this action on March 5, 2021 [Document 12700-1].

NTL is an organization of approximately 14,000 attorneys from the criminal and civil trial bar, a significant portion of whom practice mass tort litigation. NTL agrees with *Amici* that the "the proposed settlement seriously endangers access to justice for millions of people in the proposed class, would prevent Monsanto's victims from holding it accountable, and would reward Monsanto in numerous respects." [Doc. 12700 at p. 2.] It will hurt the proposed class members, not help them. This type of settlement would also provide an untenable template for other corporate tortfeasors to avoid appropriate liability and consequences for their conduct, as articulated by *Amici*: "If the proposed class action settlement is approved, there is a very real risk that corporations injuring people nationwide will try to use the approach taken in this settlement as a template for future mass tort and personal injury cases," so that "[i]njury victims' right to seek and obtain justice in our nation's courts could be replaced by a private deals worked out between corporate wrongdoers and their selected class counsel." [Doc. 12700 at pp. 2-3.]

Case 3:16-md-02741-VC Document 12741 Filed 03/08/21 Page 3 of 4

Thus, NTL President Lisa Blue and the approximately 14,000 NTL members add their collective voices to the 93 law firms and 167 lawyers who, as *Amici*, correctly conclude that the proposed class settlement is not how "a system of justice" works, and thus "[s]uch a settlement should never be approved."

Dated: March 8, 2021

Respectfully submitted,

/s/ Ted W. Pelletier

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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

Dated: March 8, 2021

Respectfully submitted,

<u>/s/ Ted W. Pelletier</u> Ted W. Pelletier