

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS  
LIABILITY LITIGATION

MDL No. 2741

Case No. 16-md-02741-VC

This document relates to:  
ALL ACTIONS

**PRETRIAL ORDER NO. 62:  
DRAFT JUROR QUESTIONNAIRE**

Included below is a draft juror questionnaire for the Group 1 bellwether trials.

**IT IS SO ORDERED.**

Date: January 4, 2019



Vince Chhabria  
United States District Judge

Juror Number: \_\_\_\_\_

**JUROR QUESTIONNAIRE**

You are being considered for a jury for a case titled *In re: Roundup Products Liability Litigation*. The plaintiff in this lawsuit is a 70-year old man named Edwin Hardeman. Mr. Hardeman is suing the company Monsanto because he believes that that his use of the Monsanto weedkiller "Roundup" caused him to develop a form of cancer called non-Hodgkin's Lymphoma. Monsanto disputes the claim.

Please complete the following questionnaire to assist the attorneys and me in selecting a jury to serve in this case. By using this questionnaire, we will not need to ask all of these questions in court.

Please complete this form honestly, completely, and with great care. There are no right or wrong answers. The responses will be reviewed only for the purpose of selecting a jury.

While some of the questions may seem very personal, I have reviewed them carefully and determined that they are relevant to the issues in this case. The questions are not meant to invade your privacy but to help select a fair jury. If there is sensitive personal information that you prefer not to discuss in front of other jurors, please write "PRIVATE" next to your answer to that question, but please still answer the question. If the attorneys need to follow up with you about a private response, the attorneys and I will speak with you about that response outside the presence of the other jurors.

Please write clearly, and do not leave any questions blank. If a question does not apply to you in any way, write "N/A" (for "not applicable"), rather than leaving the response blank. If you do not understand the question or do not know the answer, please write that in the space provided. If you need more space for a response or want to make further comments about any question, please use the extra sheets attached to the back of the questionnaire. Do not write on the back of any page. If you use the explanation sheets, please be sure to indicate which numbered question you are answering.

You are ordered not to discuss this case or questionnaire with anyone, including your family and fellow jurors. Do not do any research, such as searching for information on the internet, related to the case or any of the people involved.

You are expected to sign the questionnaire, and your answers will be treated the same way as if they were made in court under oath.

Thank you for your cooperation.



Vince Chhabria  
United States District Judge

Juror Number: \_\_\_\_\_

1. Name: \_\_\_\_\_  
Last Name First Name Middle Name

2. Do you have any trouble understanding or communicating in English?  
Yes \_\_\_\_ No \_\_\_\_  
If yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_

3. Jury selection in this case will take place on Wednesday, February 20, 2019 at  a.m. and will last most of the day. The trial will begin on February 25, 2019, and will last approximately 4 weeks, at which point the jury will begin deliberating. Trial begins each day at 8:30 a.m. and finishes between 2:00 and 2:30 p.m. Trial takes place four days out of the week – there is no trial on Thursdays. Do you have any serious scheduling issues or hardships that prevent you from serving as a juror in this case (such as prepaid travel plans, medical issues, financial concerns, or family responsibilities)? Keep in mind that if you are unable to serve in this trial, you could be placed on another trial later this year.  
Yes \_\_\_\_ No \_\_\_\_  
If yes, please explain:  
\_\_\_\_\_  
\_\_\_\_\_

4. Date of Birth: \_\_\_\_\_ Age: \_\_\_\_\_ Gender: \_\_\_\_\_

5. What city and neighborhood do you live in? \_\_\_\_\_

6. Do you own or rent your place of residence? Own \_\_\_\_ Rent \_\_\_\_ Other \_\_\_\_\_

7. Describe your educational background:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. What is your current employment status? (Check all that apply.)

- |  |                                    |
|--|------------------------------------|
| <input type="checkbox"/> Working Full-Time | <input type="checkbox"/> Disabled  |
| <input type="checkbox"/> Working Part-Time | <input type="checkbox"/> Homemaker |
| <input type="checkbox"/> Unemployed        | <input type="checkbox"/> Retired   |
| <input type="checkbox"/> Full-Time Student | <input type="checkbox"/> Other     |
| <input type="checkbox"/> Part-Time Student |                                    |

Juror Number: \_\_\_\_\_

9. Please list all of the jobs you have had in the past five years, starting with your most recent job.

Occupation	Employer	Dates of Employment	Job Description

10. If applicable, what is the occupation of your spouse or significant other and who is his/her employer?

\_\_\_\_\_

\_\_\_\_\_

11. Do you, a family member, or anyone close to you have any training, experience or expertise in the following areas? Please check all that apply.

- |                              |                                    |                                      |   |
|------------------------------|------------------------------------|--------------------------------------|---|
| Agriculture/Farming          | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Chemistry                    | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Chemical Engineering         | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Environmental Science        | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Government/Regulatory Agency | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Law/Legal Field              | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Medicine/Nursing/Health Care | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Marketing                    | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Public Relations             | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Risk Assessment              | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Statistics                   | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |

If you answered yes to any of the above, please describe:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Juror Number: \_\_\_\_\_

12. Have you or has anyone close to you ever had cancer?

\_\_\_\_\_ Yes, I have      \_\_\_\_\_ Yes, someone close to me has      \_\_\_\_\_ No

If yes:

a) Who is the person? \_\_\_\_\_

b) What type of cancer was it? \_\_\_\_\_

c) What is the current status? \_\_\_\_\_

d) Do you believe you can fairly evaluate the evidence in a trial where one party has cancer and is alleging it was caused by the other party?

Yes \_\_\_\_ No \_\_\_\_

If no, please explain:

\_\_\_\_\_  
\_\_\_\_\_

13. Have you or has anyone close to you experienced side effects from exposure to a chemical? If yes, please explain, including who, when, what chemical, and what the side effects were.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

14. Have you ever heard of Monsanto?

Yes \_\_\_\_ No \_\_\_\_

If yes, have you or has anyone close to you ever worked for, done business with, or otherwise had a financial interest in Monsanto? If yes, please explain:

\_\_\_\_\_  
\_\_\_\_\_

15. Have you heard, read or seen any news reports about Monsanto?

Yes \_\_\_\_ No \_\_\_\_

If yes, please describe them to the best of your recollection:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Juror Number: \_\_\_\_\_

16. Have you heard or read anything about a recent trial in San Francisco involving Monsanto?

Yes \_\_\_\_ No \_\_\_\_

If yes:

a) Do you know the outcome of the trial? Yes \_\_\_\_ No \_\_\_\_

b) If you answered yes to (a), please write down everything you remember about the outcome:

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c) Please write down anything else you remember about what you heard or read:

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17. Do you have any opinions or feelings about Monsanto, or any chemical company, that may make it difficult for you to fairly evaluate the evidence in a trial where an individual is claiming that the company's product caused their cancer?

Yes \_\_\_\_ No \_\_\_\_

If yes, please explain:

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18. Before today, have you heard, read, or seen any news reports concerning this lawsuit, *In re: Roundup Products Liability Litigation*?

Yes \_\_\_\_ No \_\_\_\_

If yes, please explain what you have heard:

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19. Before today, have you heard, read, or seen anything about the product Roundup?

Yes \_\_\_\_ No \_\_\_\_

If yes, please explain what you have heard:

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Juror Number: \_\_\_\_\_

20. Have you or has anyone in your household used the product Roundup or any other weedkilling product? If yes, please explain who and how often:

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21. Does anyone else close to you regularly use Roundup? If yes, please explain who and how often.

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22. Is there any information that you have not been asked that you feel the Court should know or that might be relevant in any way to this trial or to your potential jury service? If it is something personal or private, please explain below so that you may be questioned about it privately, rather than in open court.

Yes \_\_\_\_ No \_\_\_\_  
If yes, please explain:

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23. A list of names is attached to this questionnaire. Please circle the names of any of the people that you personally know.

24. Please complete the Juror's Oath below.

**JUROR'S OATH**

I declare under penalty of perjury that the answers in this Juror Questionnaire are true and correct to the best of my knowledge and belief.

Juror Signature: \_\_\_\_\_

Juror Name (Print): \_\_\_\_\_

Date: \_\_\_\_\_

