

# **EXHIBIT 35**

## Monsanto Manuscript Clearance Form Global Regulatory

**NOTE:** this form needs to be completed and submitted for review at least 4 weeks prior to manuscript submission and a minimum of 2 weeks prior to abstract/presentation submission

Questions regarding completion of this form can be directed to Jeanna Graf [REDACTED] or Kevin Glenn [REDACTED]

Date: 2/29/2012

Please indicate type of publication:  Manuscript  Conference/meeting presentation  Abstract

Has this information been publicly disclosed previously?  No  Yes If yes, where & when? This manuscript reviews glyphosate genotoxicity publications since the Williams et al. (2000) review

(If the information has previously been published, no need to include Patent Scientist & Patent Atty review)

Title: Review of Genotoxicity of Glyphosate and Glyphosate Based Formulations

Author(s): David Saltmiras, Larry Kier (consultant)

Author Handling Correspondence: David Saltmiras Mail Zone: C1NA Phone: [REDACTED]

Is this related to a Monsanto collaboration?  No  Yes If yes, Other

Meeting Date & Location at which Manuscript will be presented:

Journal Submitted To: Reg. Toxicol. Pharmacol.


**Lead Author's Comments:** (Please provide information on purpose of presentation/publication and any relevant patents or manuscript disclosures.) This manuscript provide a comprehensive quality check on the large number of genotoxicity publications on glyphosate since the Williams et al. (2000) glyphosate toxicology review manuscript. This work falls under the scope of the EU Glyphosate Task Force and will be a valuable resource in future product defense against claims that glyphosate is mutagenic or genotoxic.

**Title:** Review of Genotoxicity of Glyphosate and Glyphosate Based Formulations

**Author Material Transfer Agreement Statement:** (Please refer questions to a patent attorney.) I have reviewed the material transfer and data disclosure requirements of the proposed journal and have discussed any such requirements with my direct supervisor. I ensure that when I submit this manuscript, the journal either does not or will not in this instance require Monsanto to provide restricted plasmids or other materials referenced in our manuscript, or that I will obtain legal approval for any such materials prior to submission of this paper.

I have reviewed that the appropriate individuals that have contributed substantial, direct, intellectual work to this manuscript/presentation are included as authors, and other significant contributors have been appropriately acknowledged.

**REQUESTOR'S SIGNATURE:** 

Reviewer: Please review, sign, and return.		
Reviewer	Approval Signature	Date
Program Lead, Tech Center John Vicini, C1NA, (W.Blackden)		3/9/2012
Center Lead * Nordine Cheikh, C3NA, (J.Graf)		
Regulatory Team Lead (Crop/Chem) Chemistry; Susan Martino-Catt C3NA (L. Billadeau)		
Crop/ChemTeam Lead Not Applicable		
Regulatory Law <input type="checkbox"/> Not Applicable Regulatory Law (Add'l Reviewer) <input type="checkbox"/> Brandon Neuschafer, E1NH (J. Wardlow)		
Regulatory Scientific Affairs Eric Sachs, C3NA, (J. Graf)		
Biotechnology <input type="checkbox"/> Not Applicable		
Patent Scientist <input type="checkbox"/> Not Applicable Patent Scientist (Add'l Reviewer) <input type="checkbox"/> Not Applicable		
Patent Attorney <input type="checkbox"/> Not Applicable Patent Attorney (Add'l Reviewer) <input type="checkbox"/> Not Applicable		
Regulatory Regional Lead <input type="checkbox"/> <input type="checkbox"/> Not Applicable		
Additional Reviewer:  Other:		

**Requestor must send an email message as well as the manuscript clearance form to the administrative assistant of the selected Lead.**

\*Center Lead: Please add any other Program Leads that should be included in the review process, and choose "not applicable" for any reviewers that should not be included.

\*\*To be selected when involving samples / data from regional investigators.

**Requestor must first collate all the signed pages and then send them to Gracie Williams, BB1B (Chesterfield Valley).**

## **Monsanto Manuscript Clearance Reviewer Guidelines Form Global Regulatory**

**Reviewers:** Please complete your review of this manuscript within 7 working days (abstract/presentation) and 21 working days (publication/manuscript). If timely review is not possible, please communicate this to the lead author within 2 – 3 days of receipt of this MCF indicating a delegate within your organization that can perform the review. Also, please note, reviews are being completed **concurrently**, not sequentially.

### **Program Lead, Tech Center (TC)**

Determine if this is the first TC publication on this trait or MON # and that the publication follows past TC practices with earlier Monsanto publications. Ensure that the scientific conclusions (e.g. of compositional equivalence, natural variability) are justified by presented data. Ensure that individuals that have contributed substantial, direct, intellectual work to this manuscript are included as authors and other significant contributions are appropriately acknowledged.

### **Center Lead**

Determine that the scientific conclusions are clearly stated and supported by the data. Review assessment of the TC Program Lead (if available). Determine if other TC representatives need to review and provide additional scientific insights and input. Ensure that individuals that have contributed substantial, direct, intellectual work to this manuscript are included as authors and other significant contributions are appropriately acknowledged.

### **Regulatory Team Lead (Crop/Chem)**

Ensure that descriptions of MOA, product concepts, etc. are consistent with Product Core Team (PCT) standards, any prior Biotechnology communications, submission documents, etc. Ensure that the manuscript is consistent with the Regulatory and Biotechnology publication strategy.

### **Crop/Chem Team Lead**

Ensure that descriptions of MOA, product concepts, etc. are consistent with any prior Biotechnology communications, PCT standards or submissions of trait or MON #. Ensure that the manuscript is consistent with the Regulatory and Biotechnology publication strategy. Confirm that publication contains no comparative assessments or statements between different MONs and that any reference to other MONs is accurate and consistent with prior communications.

### **Regulatory Law**

Ensure that publication of MON # (or other invention) is legal and does not compromise Monsanto FTO.

### **Regulatory Scientific Affairs**

Ensure that descriptions of MOA, product concepts are consistent with prior communications of trait or MON #. Ensure that the manuscript is consistent with the Regulatory and Biotechnology publication strategy. Ensure that any policy statements or implications are consistent with both Regulatory strategies and scientific outreach efforts.

### **Biotechnology**

Ensure that descriptions of MOA, gene sequence, product concepts, etc. are consistent with any prior Biotechnology communications or publications on MON # or related biotech traits. Ensure that the manuscript is consistent with the Regulatory and Biotechnology publication strategy.

### **Patent Scientist**

Determine that all relevant patents related to MON # are fully in place. Ensure publication does not impact right of Monsanto to make, use, or sell the claimed invention or MON #. Ensure there are no statements or assessments that could result in a loss of IP.

### **Patent Attorney**

Determine if any patents related to MON # are fully in place. Ensure publication does not impact right of Monsanto to make, use, or sell the claimed invention or MON # or a limited period of time. Ensure there are no statements or assessments that could result in a loss of IP. Confirm assessment of patent scientists.

### **Regulatory Regional Lead**

Ensure that the manuscript is consistent with the regional Regulatory strategy. Ensure that individuals that have contributed substantial, direct, intellectual work to this manuscript are included as authors and other significant contributions are appropriately acknowledged.

Responsibility	Program Lead, TC	TC Lead	Regulatory TL	Crop/Chem TL	Regulatory Law	Scientific Affairs	Biotechnology	Patent Scientist	Patent Attorney	Regional Lead
Scientific conclusions are clearly stated and supported by the data	x	x								
Determine whether publication is first TC publication on this event and follows past TC publication practices	x									
Forward MCF to other TC representatives for review		x								
Description of MOA, product concept, etc. is consistent with PCT and Biotech standards			x	x		x	x			
Manuscript fits with crop team's overall strategic positioning and publication strategy			x	x		x	x			x
Confirm no comparative assessments or statements between different MONs and that reference to other MONs is accurate and consistent with prior communications				x						
Ensure that any policy statements or implications are consistent with Regulatory and scientific outreach strategies						x				x
Ensure that publication of MON # (or other invention) is legal and does not compromise Monsanto FTO or intellectual property					x			x		
Verify authorship and acknowledgements	x	x								x

February 28, 2012

Regulatory MCF

Page 5 of 5