

EXHIBIT 2

Confidential - Edwin Hardeman

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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:)	
)	
Hardeman v. Monsanto Co.,)	
et al.)	
Case No. 3:16-cv-00525-VC)	
)	
)	

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CONFIDENTIAL

VIDEOTAPED

DEPOSITION OF EDWIN HARDEMAN

Held at the Vintners Inn
4350 Barnes Road, Santa Rosa, California
Thursday, November 8, 2018, 9:16 a.m.

- - - -

REPORTED BY: ELAINA BULDA-JONES, CSR NO. 11720

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<p>1 a picture of that, I'm sorry.</p> <p>2 Q. But you think the label was white and</p> <p>3 possibly red?</p> <p>4 A. No. No, I'm saying, the container, the</p> <p>5 container background, I know it was a white</p> <p>6 container. It wasn't a green or a blue. And it was</p> <p>7 a white container. And I think it had whatever</p> <p>8 color graphics they put on to advertise their</p> <p>9 product. I'm not sure. I don't remember what</p> <p>10 that -- what that color was. That could have been</p> <p>11 red. It could have been blue. It could have</p> <p>12 been -- I don't know.</p> <p>13 Q. Do you have any pictures of the products</p> <p>14 that you used?</p> <p>15 A. No -- no, I don't. The only thing I have</p> <p>16 leftover is -- it was in a -- it was in a -- I put</p> <p>17 it into another jar, the Roundup that I was using.</p> <p>18 I had leftover. But I lost the cap so -- put it</p> <p>19 into a clear jar. It was like a jar like this.</p> <p>20 Q. Do you have the jar with you today?</p> <p>21 A. Not today. No, I have -- don't we have a</p> <p>22 picture of it? I don't know. I don't know. I</p> <p>23 don't have a jar with me.</p> <p>24 Q. So you still have Roundup in your current</p> <p>25 property in a jar with the lid on it?</p>	<p>1 ourselves. And that's when we started to. We</p> <p>2 bought the Roundup and put it into the pump-up</p> <p>3 sprayer. So that was 19- -- let's see -- it's got</p> <p>4 to be '86, I guess, '86. '85, '86, I think we moved</p> <p>5 in there, yeah.</p> <p>6 Q. So the first time you used Roundup was in</p> <p>7 1986?</p> <p>8 A. Yeah, I would say, yeah. We -- we got</p> <p>9 introduced to the Roundup and what it could do. So,</p> <p>10 you know...</p> <p>11 Q. So you said it was a landscaper that</p> <p>12 recommended that you use the --</p> <p>13 A. He didn't recommend it. He -- we -- we --</p> <p>14 I don't know why we ended up having him come on and</p> <p>15 we had some -- we -- we had a five-acre piece up</p> <p>16 there and it was a gravel driveway and road that</p> <p>17 went all the way down to the main road and, you</p> <p>18 know, the property -- usable on both sides, and we</p> <p>19 wanted to take care of the stuff coming up through</p> <p>20 our gravel road and --</p> <p>21 Q. You wanted to get the weeds?</p> <p>22 A. We wanted to get the weeds, you know -- I</p> <p>23 mean, you know, to treat them coming up in different</p> <p>24 spots. And, you know, I don't know, for some reason</p> <p>25 we hooked up with him. He came out and we saw him</p>
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<p>1 A. Yes, I brought that over with us, yeah. I</p> <p>2 never used it. But it's over there.</p> <p>3 Q. When did you use the Roundup concentrate?</p> <p>4 A. When? When did I start?</p> <p>5 Q. What years? Yeah, what -- what year did</p> <p>6 you start?</p> <p>7 A. Well, let's see.</p> <p>8 We moved into -- on the Westside Road</p> <p>9 property, moved there in '88. So, you know, I</p> <p>10 probably -- I don't know. I'm just approximating.</p> <p>11 By the time we got organized with the move and</p> <p>12 whatever else was going on there and then I got</p> <p>13 around to spraying, I -- I would say it could have</p> <p>14 been, you know, '89 forward. It could have been '89</p> <p>15 when I started spraying. I usually, you know, would</p> <p>16 do that in warmer months, preferably, if I could.</p> <p>17 Q. So the first property you sprayed on was</p> <p>18 the Westside Road property?</p> <p>19 A. No, I sprayed in -- well, if you want to</p> <p>20 go back to Iverson Road, yeah, we had a -- in the</p> <p>21 beginning we moved into Iverson Road in '85. There</p> <p>22 was a -- a landscaper who was -- we hired and he was</p> <p>23 spraying some Roundup and then we asked him what he</p> <p>24 was using and he told us and we figured, oh, heck,</p> <p>25 you know, we went down, we said we could do that</p>	<p>1 spraying. The we probably figured out he's charging</p> <p>2 too much. So we went and figured out we could do</p> <p>3 this ourselves. So, you know, we went and bought</p> <p>4 some and there we go. We were on our way.</p> <p>5 Q. So did anyone specifically recommend</p> <p>6 Roundup to you?</p> <p>7 A. I don't think so. I don't know why we</p> <p>8 ended up getting the Roundup. Maybe -- I don't</p> <p>9 know. Maybe we asked him what he was using or -- I</p> <p>10 think -- it must have been something like that.</p> <p>11 I -- it was so long ago that we -- you know, we --</p> <p>12 then we went and looked at the stores to see if</p> <p>13 this -- we could buy it and found out it was</p> <p>14 available. So that's how we got introduced to it.</p> <p>15 Q. So just to summarize.</p> <p>16 The way you were introduced to -- to</p> <p>17 Roundup was because a landscaper was --</p> <p>18 A. Initially, yes.</p> <p>19 Q. -- was using it on your product -- you</p> <p>20 recognized what he was using was Roundup and,</p> <p>21 therefore, you went to the store and purchased it</p> <p>22 yourself?</p> <p>23 A. Yeah.</p> <p>24 Q. Any other reason that you started using</p> <p>25 Roundup?</p>