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WILKINSON WALSH + ESKOVITZ LLP

Brian L. Stekloff (*pro hac vice*)
(bstekloff@wilkinsonwalsh.com)
Rakesh Kilaru (*pro hac vice*)
(rkilaru@wilkinsonwalsh.com)
2001 M St. NW
10th Floor
Washington, DC 20036
Tel: 202-847-4030
Fax: 202-847-4005

**ARNOLD & PORTER KAYE SCHOLER
LLP**

Pamela Yates (CA Bar No. 137440)
(Pamela.Yates@arnoldporter.com)
777 South Figueroa St., 44th Floor
Los Angeles, CA 90017
Tel: 213-243-4178
Fax: 213-243-4199

HOLLINGSWORTH LLP

Eric G. Lasker (*pro hac vice*)
(elasker@hollingsworthllp.com)
1350 I St. NW
Washington, DC 20005
Tel: 202-898-5843
Fax: 202-682-1639

COVINGTON & BURLING LLP

Michael X. Imbroscio (*pro hac vice*)
(mimbroscio@cov.com)
One City Center
850 10th St. NW
Washington, DC 20001
Tel: 202-662-6000

*Attorneys for Defendant
MONSANTO COMPANY*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

) MDL No. 2741
)
) Case No. 3:16-md-02741-VC
)

Hardeman v. Monsanto Co., et al.,
3:16-cv-0525-VC
Stevick v. Monsanto Co., et al.,
3:16-cv-2341-VC
Gebeyehou v. Monsanto Co., et al.,
3:16-cv-5813-VC

) **MONSANTO'S LIST OF EXHIBITS**
) **INTRODUCED AT THE JANUARY 28,**
) **2019 DAUBERT HEARING**
)
)
)

1 Pursuant to Pretrial Order No. 68, Defendant Monsanto Company (“Monsanto”) hereby
2 submits the list of exhibits entered into evidence during the cross examination of Dr. Andrei
3 Shustov on January 28, 2019. Monsanto will provide the court with a binder of these exhibits
4 on Monday morning, February 4, 2019. The exhibits used were:

5 • Daubert Exhibit 5: Correspondence dated 12/19/2018 between counsel for
6 Plaintiffs and counsel for Monsanto re Dr. Shustov Deposition – Nabhan Report;

7 • Daubert Exhibit 6: Dr. Nabhan’s General Causation Report with redactions and
8 highlights comparing it to Dr. Shustov’s Expert Report for plaintiff Elaine Stevick;

9 • Daubert Exhibit 7: Dr. Shustov’s Expert Report for plaintiff Elaine Stevick with
10 highlights comparing it to the general causation portions of Dr. Nabhan’s General Causation
11 report;

12 • Daubert Exhibit 8: Dr. Nabhan’s Expert Report for plaintiff Elaine Stevick with
13 highlights comparing it to the specific causation portions of Dr. Shustov’s report for plaintiff
14 Elaine Stevick;

15 • Daubert Exhibit 9: Dr. Shustov’s Expert Report for plaintiff Elaine Stevick with
16 highlights comparing it to the specific causation portions of Dr. Nabhan’s report for plaintiff
17 Elaine Stevick;

18 • Daubert Exhibit 10: Dr. Shustov’s Report for plaintiff Edwin Hardeman;

19 • Daubert Exhibit 11: Photograph;

20 • Daubert Exhibit 12: Edwin Hardeman Medical Records (Confidential-
21 Hardeman-EHardeman-KPNValley-MD-004978-4982) [FILED PROVISIONALLY UNDER
22 SEAL AS APPROVED BY THE COURT];

23 • Daubert Exhibit 13: Edwin Hardeman Medical Records (Confidential-
24 Hardeman-EHardeman-KPNValley-MD-005044-5049) [FILED PROVISIONALLY UNDER
25 SEAL AS APPROVED BY THE COURT];

26 • Daubert Exhibit 14: Edwin Hardeman Medical Records (Confidential-
27 Hardeman-EHardeman-KPNValley-MD-005139-5414; -005289-52890; -002494-2496;
28

1 -000044-46; -000223-227; -000468-473) [FILED PROVISIONALLY UNDER SEAL AS
2 APPROVED BY THE COURT];

3 • Daubert Exhibit 15: Giordano et al., *Risk of Non-Hodgkin Lymphoma and*
4 *Lymphoproliferative Precursor Diseases in US Veterans with Hepatitis C Virus* (2007);

5 • Daubert Exhibit 16: de Sanjose et al., *Hepatitis C and Non-Hodgkin Lymphoma*
6 *Among 4784 Cases and 6269 Controls from the International Lymphoma Epidemiology*
7 *Consortium* (2008);

8 • Daubert Exhibit 17: Mahale et al., *The Effect of Sustained Virological Response*
9 *on the Risk of Extrahepatic Manifestations of Hepatitis C Virus Infection* (2018).

10
11 Dated: February 2, 2019

12 Respectfully submitted,

13 /s/ Brian L. Stekloff

14 Brian L. Stekloff (*pro hac vice*)
15 (bstekloff@wilkinsonwalsh.com)
16 Rakesh Kilaru (*pro hac vice*)
17 (rkilaru@wilkinsonwalsh.com)
18 WILKINSON WALSH + ESKOVITZ LLP
2001 M St. NW, 10th Floor
Washington, DC 20036
Tel: 202-847-4030
Fax: 202-847-4005

19 Pamela Yates (CA Bar No. 137440)
20 (Pamela.Yates@arnoldporter.com)
21 ARNOLD & PORTER KAYE SCHOLER LLP
22 777 South Figueroa St., 44th Floor
23 Los Angeles, CA 90017
24 Tel: 213-243-4178
25 Fax: 213-243-4199

26 Eric G. Lasker (*pro hac vice*)
27 (elasker@hollingsworthllp.com)
28 HOLLINGSWORTH LLP
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Washington, DC 20005
Tel: 202-898-5843
Fax: 202-682-1639

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Michael X. Imbroscio (*pro hac vice*)
(mimbroscio@cov.com)
COVINGTON & BURLING LLP
One City Center
850 10th St. NW
Washington, DC 20001
Tel: 202-662-6000

Attorneys for Defendant
MONSANTO COMPANY

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of February 2019, a copy of the foregoing was filed with the Clerk of the Court through the CM/ECF system which sent notice of the filing to all appearing parties of record.

/s/ Brian L. Stekloff