

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS  
LIABILITY LITIGATION

) MDL No. 2741

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

) **STIPULATION WITH [PROPOSED]**  
) **ORDER REGARDING COLLATERAL**  
) **SOURCE EVIDENCE**

\_\_\_\_\_  
*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

The parties jointly stipulate as follows with respect to collateral source evidence:<sup>1</sup>

1. Neither party will seek to introduce evidence regarding Plaintiffs' health insurance;
2. Neither party will argue or imply that such collateral benefits do exist or do not exist;
3. Neither party will argue or imply that liability insurance would cover any verdict against Monsanto in whole or in part;
4. The parties agree that references to any collateral source benefits may be redacted from otherwise admissible documents such as medical records and do not render those documents wholly inadmissible.

Dated: January 30, 2019

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<sup>1</sup> This stipulation does not apply to voir dire.

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12 /s/ Brian L. Stekloff

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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE VINCE CHHABRIA  
UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of January 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\_\_\_\_\_

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