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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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)	
IN RE: ROUNDUP PRODUCTS)	MDL No. 2741
LIABILITY LITIGATION)	
_____)	Case No. 3:16-md-02741-VC
)	
This document relates to:)	<u>DEPOSITION DESIGNATIONS FOR</u>
)	<u>PHASE 2 WITNESSES</u>
<i>Hardeman v. Monsanto Co., et al.,</i>)	
3:16-cv-0525-VC)	
)	
)	
_____)	

Plaintiff submits the following deposition designations in page:line format, including all objections, responses, counter-designations, and counter-counter designations for witnesses whom the parties anticipate will testify in Phase 2.

Specifically, Plaintiff intends on calling the following witnesses in Phase 2:

- David Heering; and
- Doreen Manchester in her 30(b)(6) capacity for Croplife America.

The parties intend to continue to meet and confer regarding the designations below in an effort to further streamline them and reduce the number of objections and areas of disagreement.

The parties reserve the right to supplement, revise, correct, clarify, withdraw, or otherwise amend these designations. Without waiving any objections, the parties also reserve the right to introduce into evidence any deposition testimony designated by the other party. In addition, both parties reserve the right to use any deposition testimony at trial as necessary for impeachment and/or rebuttal.

Additionally, Plaintiff previously filed the page:line format, including all objections, responses, counter-designations, and counter-counter designations for Hugh Grant (Dkt. No. 183,

1 Exhibit 15); however, certain rows of the spreadsheet were inadvertently omitted from Plaintiff's
2 filing. A full version of the page:line format, including all objections, responses, counter-
3 designations, and counter-counter designations for Hugh Grant is attached.

4 Dated: March 10, 2019

ANDRUS WAGSTAFF, PC

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Co-counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of March 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/ Aimee H. Wagstaff

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