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14 *Co-counsel for Plaintiff*

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 IN RE: ROUNDUP PRODUCTS
18 LIABILITY LITIGATION

19)
20)
21) MDL No. 2741
22)
23) Case No. 3:16-md-02741-VC
24)

25 This document relates to:

26) **DEPOSITION DESIGNATIONS FOR**
27) **PHASE 2 WITNESSES**
28)

29 *Hardeman v. Monsanto Co., et al.,*
30 3:16-cv-0525-VC

31
32 The parties submit the following deposition designations in page:line format, including
33 all objections, responses, counter-designations, and counter-counter designations for witnesses
34 whom the parties anticipate will testify in Phase 2.

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

- 36 • Kirk Azevedo
- 37 • Donna Farmer
- 38 • Hugh Grant

- 1 • Steven Gould
- 2 • James Guard
- 3 • William Heydens
- 4 • Daniel Jenkins
- 5 • Larry Kier
- 6 • Michael Koch
- 7 • Mark Martens
- 8 • Samuel Murphy
- 9 • Roger McClellan
- 10 • Christopher Portier
- 11 • William Reeves
- 12 • David Saltmiras
- 13 • Roger Turk
- 14 • Jeffrey Ye
- 15 • Todd Rands

16 Monsanto has provided counter-designations and objections to the above witnesses and
17 has also included affirmative designations for the following witnesses:

- 18 • Donna Farmer
- 19 • Christopher Portier
- 20 • William Reeves
- 21 • Roger Turk
- 22 • Jeffrey Ye

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

25 The parties reserve the right to supplement, revise, correct, clarify, withdraw, or
26 otherwise amend these designations. Without waiving any objections, the parties also reserve
27 the right to introduce into evidence any deposition testimony designated by the other party. In
28

1 addition, both parties reserve the right to use any deposition testimony at trial as necessary for
2 impeachment and/or rebuttal.

3
4 Dated: March 10, 2019

ANDRUS WAGSTAFF, PC

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6 By: /s/ Aimee H. Wagstaff
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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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