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A LIMITED LIABILITY PARTNERSHIP

WASHINGTON, D.C. | LOS ANGELES

March 3, 2019

**VIA ECF**

Hon. Vince Chhabria  
San Francisco Courthouse, Courtroom 4  
450 Golden Gate Avenue  
San Francisco, CA 94102

**Re: *In re Roundup Prods. Liab. Litig., No. 3:16-md-02741-VC***

Dear Judge Chhabria:

Monsanto respectfully submits, as Exhibit 1 hereto, a proposed stipulation on the Knezevich and Hogan study to be read to the jury in lieu of Plaintiff's proposed designations of deposition testimony from Dr. Reeves. Monsanto continues to believe that further evidence regarding the study is inadmissible in Phase 1, especially in light of Monsanto's limited cross-examination of Dr. Portier on the study, which featured no questions about the number of kidney tumors in the study. Any connection between the number of kidney tumors found in a 1983 mouse study and the contemporary medical practice of doctors treating Non-Hodgkin's Lymphoma is speculative, as Plaintiffs' counsel conceded. *See* 3/1/19 Trial Tr. at 886:24-887:1. But in the event the Court disagrees, Monsanto believes that this proposed stipulation is a more efficient use of the jury's time, and would avoid the misimpressions created by the proposed Reeves designations about the EPA's ultimate assessment of glyphosate and the timing of that assessment.

Respectfully submitted,

/s/ Brian L. Stekloff

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Cc: Counsel of Record (via ECF)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> 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/ Brian L. Stekloff