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A LIMITED LIABILITY PARTNERSHIP

March 5, 2019

## **VIA ECF**

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

Re: Hardeman v. Monsanto Co., No. 3:16-cv-00525-VC

### Dear Judge Chhabria:

Consistent with the Court's ruling on Plaintiffs' motion *in limine* No. 2, *see* PTO 81 at 5, Monsanto respectfully requests leave to ask the following questions of its case-specific experts, Dr. Daniel Arber and Dr. Alexandra Levine. Monsanto expects that the answers to all of these questions will be brief.

#### Dr. Arber:

• What, if any, role does Roundup play in your clinical practice as a pathologist?

#### Dr. Levine:

- Have you reviewed the epidemiological literature regarding Roundup and NHL?
- Have you also reviewed Dr. Mucci's report?
- Are you relying on Dr. Mucci's explanation of the epidemiology to the jury so you can focus on a discussion of Mr. Hardeman?
- Is Dr. Mucci's analysis consistent with your own professional and clinical experience as a practicing hematologist-oncologist?
- Based on your clinical practice, do you have an opinion on whether there is an association between Roundup and NHL?
- What, if any, opinion do you have on whether Roundup is a risk factor for NHL?

• What, if any, opinion do you have on whether Roundup can cause NHL?.

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 5<sup>th</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	
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