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9 *Co-counsel for Plaintiff*

10 UNITED STATES DISTRICT COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA

12 IN RE: ROUNDUP PRODUCTS  
 13 LIABILITY LITIGATION

MDL No. 2741  
 Case No. 3:16-md-02741-VC

14 This document relates to:  
 15 *Hardeman v. Monsanto*, 3:16-cv-00525-VC  
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**PLAINTIFF'S PROPOSED VERDICT  
 FORM**

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**VERDICT FORM**

We, the Jury, answer the questions submitted to us as follows:

1. On Edwin Hardeman’s claim for design defect:

We find in favor of Edwin Hardeman,  
and against Monsanto.

We find in favor of Monsanto, and  
against Edwin Hardeman.

2. On Edwin Hardeman’s claim for strict liability failure to warn:

We find in favor of Edwin Hardeman,  
and against Monsanto.

We find in favor of Monsanto, and  
against Edwin Hardeman.

3. On Edwin Hardeman’s claim for negligent failure to warn:

We find in favor of Edwin Hardeman,  
and against Monsanto.

We find in favor of Monsanto, and  
against Edwin Hardeman.

If you find in favor of Mr. Hardeman on *at least one* of the claims, proceed to Question 4. If you find in favor of Monsanto and against Mr. Hardeman on all three claims, stop, sign, and date this form, and notify the court attendant that you have reached a verdict.

**CLAIM OF DAMAGES FOR EDWIN HARDEMAN**

4. What are Edwin Hardeman’s damages?

Past economic loss: \$ 200,967.10

Past noneconomic loss: \$ \_\_\_\_\_

Future noneconomic loss: \$ \_\_\_\_\_

**PUNITIVE DAMAGES**

5. Did Monsanto engage in conduct with malice, oppression, or fraud?

Yes

No

6. What amount of punitive damages, if any, do you award Edwin Hardeman?

\$ \_\_\_\_\_

Signed: \_\_\_\_\_

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

**PRESIDING JUROR**

*After this verdict form has been signed, notify the court attendant that you are ready to present your verdict in the courtroom.*

DATED: March 14, 2019

Respectfully submitted,

/s/ Aimee Wagstaff  
**ANDRUS WAGSTAFF, PC**  
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*Co-counsel for Plaintiff*

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**CERTIFICATE OF SERVICE**

I certify that on March 14, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Aimee Wagstaff\_\_\_\_\_