



MOORE LAW GROUP PLLC

March 22, 2019

FILED VIA ECF

Honorable Vince Chhabria
 United States District Court,
 Northern District of California

**RE: Case No: 3:16-md-02741-VC, In Re Roundup Products Liability Litigation
 Case No: 3:16-cv-00525-VC, Hardeman v. Monsanto**

To the Honorable Vince Chhabria:

As instructed, Plaintiff, Edwin Hardeman, has re-reviewed the remaining depositions he would like to play in Phase 2 and significantly cut and/or eliminated deposition testimony.

First, Plaintiff no longer is calling the following witnesses by deposition: Daniel Goldstein, Steven Gould, David Heering, Daniel Jenkins, Roger McClellan, Todd Rands, Dr. Roger Turk, Dr. Richard Turley, and Dr. Jeffrey Ye. The Court no longer needs to review these depositions.

Second, after de-designating significant portions of testimony and meeting and conferring with Defendant, Plaintiff submits the following depositions for the Court's ruling in Phase two:

<u>Deponent</u>	<u>Plaintiff Time*</u>	<u>Defendant Time*</u>	<u>Total Time*</u>
Kirk Azevedo	00:06:37	00:02:59	00:09:35
Hugh Grant	00:27:46	00:09:59	00:37:45
James Guard	00:23:08	00:07:08	00:30:16
William Heydens (Court previously ruled upon)	00:32:40	00:49:39	01:22:19
Larry Kier	00:35:56	00:19:53	00:55:54
Michael Koch	00:17:18	00:04:54	00:22:12
Doreen Manchester	00:12:14	00:02:15	00:14:29
Samuel Murphey	00:05:53	00:02:12	00:08:05
Christopher Portier	00:14:40	00:20:09	00:34:49
David Saltmiras	00:04:59	00:23:53	00:28:52

* Times are estimated based on current edits, actual run time could vary slightly.

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The remaining deposition testimony is necessary in order for Plaintiff to meet his burden of proof and submit his claims properly to the jury and provide sufficient evidence to seek compensatory and punitive damages.

Finally, Plaintiff is not calling Dr. Mills live to testify. We sent an updated proposed stipulation regarding Monsanto's financial condition to defense today for review and signature based upon the Court's rulings.

Plaintiff believes that these additional de-designations and eliminations of several witnesses provides further proof that Plaintiff is working hard to efficiently and fairly present his case to the jury. For these reasons, Plaintiff respectfully requests the Court grant additional time so that Plaintiff may play the remaining depositions listed in the chart above.

Respectfully submitted,

/s/ Jennifer A. Moore

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