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8
9 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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11 IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

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

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13 This document relates to:
14 *Hardeman v. Monsanto*, 3:16-cv-00525 - VC

**PLAINTIFF’S RESPONSE TO PRETRIAL
ORDER NO. 111, SCOPE OF DR.
BENBROOK’S TRIAL TESTIMONY**

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16 In Response to Pretrial Order No. 111, Mr. Hardeman narrows the scope of Dr.
17 Benbrook’s trial testimony to the following 4 categories. Opinions on these four categories are
18 included throughout Dr. Benbrook’s expert report. However, in an attempt to focus the Court’s
19 review, and pursuant to Pretrial Order No. 111, Plaintiff directs the Court to certain identified
20 paragraphs within Dr. Benbrook’s expert report.

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22 1. **Early EPA Action of Glyphosate and the IBT Story**. This testimony will
23 demonstrate that when Mr. Hardeman began spraying Roundup in 1985/1986,
24 there was no study to support the registration and sale of glyphosate. This
testimony goes directly to liability and punitive damages.

25 a. Summary of opinions and generally, paragraphs 198-225 & 270-387.

26 2. **Monsanto’s refusal to study the formulated product**. This testimony goes
27 directly to liability and punitive damages.

28 a. Summary of opinions and generally, paragraphs 236-269.

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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
Aimee H. Wagstaff