	Case 3:16-md-02741-VC Document 2992 Filed 03/	14/19	Page 1 of 3	
1 2 3 4 5 6 7 8 9	Aimee H. Wagstaff (SBN 278480) 7171 W. Alaska Drive Lakewood, CO 80226 Tel: (303) 376-6360 aimee.wagstaff@andruswagstaff.com <b>MOORE LAW GROUP, PLLC</b> Jennifer A. Moore (SBN 206779) 1473 South 4 <sup>th</sup> Street Louisville, Kentucky 40208 Tel: (502) 717-4080 jennifer@moorelawgroup.com	COU	ЯТ	
10	NORTHERN DISTRICT OF CALIFORNIA			
11 12	LIABILITY LITIGATION		ud-02741-VC	
13 14	Hardeman v. Monsanto, 3:16-cv-00525 - VC	NO. 11	RESPONSE TO PRETRIAL 1, SCOPE OF DR. TRIAL TESTIMONY	
<ol> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	In Response to Pretrial Order No. 111, Mr. Hardeman narrows the scope of Dr. Benbrook's trial testimony to the following 4 categories. Opinions on these four categories are included throughout Dr. Benbrook's expert report. However, in an attempt to focus the Court's review, and pursuant to Pretrial Order No. 111, Plaintiff directs the Court to certain identified paragraphs within Dr. Benbrook's expert report. 1. <u>Early EPA Action of Glyphosate and the IBT Story</u> . This testimony will demonstrate that when Mr. Hardeman began spraying Roundup in 1985/1986,			
23 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	<ol> <li>Monsanto's refusal to study the formulated product. This testimony goes directly to liability and punitive damages.</li> </ol>			
27 28	a. Summary of opinions and generally, paragraphs 236-269.			
_0	- 1 - PLAINTIFF'S RESPONSE TO PRETRIAL ORDER NO. 1 TRIAL TESTIMONY	11, SC	OPE OF DR. BENBROOK'S	

	Case 3:16-md-02741-VC Document 2992 Filed 03/14/19 Page 2 of 3
1 2 3 4 5 6 7 8 9 10 11	<ol> <li>Monsanto's termination of TNO after it demonstrated elevated rates of dermal absorption. This testimony goes directly to liability and punitive damages.         <ul> <li>a. Summary of opinions and generally, paragraphs 431-451.</li> <li>Ghostwriting. This testimony goes directly to liability and punitive damages.</li></ul></li></ol>
12 13	paragraphs 587-590; 622-716.
14	DATED: March 14, 2019. Respectfully submitted,
<ol> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol>	/s/ Aimee Wagstaff Aimee Wagstaff aimee.wagstaff@andruswagstaff.com Andrus Wagstaff, P.C. 7171 West Alaska Drive Lakewood CO 80226 Tel: 303-376-6360 /s/ Jennifer A. Moore Jennifer Moore Jennifer Moore Jennifer Moore Jennifer @moorelawgroup.com Moore Law Group, PLLC 1473 South 4 <sup>th</sup> Street Louisville, Kentucky 40208 Tel: (502) 717-4080 Counsel for Plaintiff
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	- 2 - PLAINTIFF'S RESPONSE TO PRETRIAL ORDER NO. 111, SCOPE OF DR. BENBROOK'S TRIAL TESTIMONY

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1	CERTIFICATE OF SERVICE			
2	I certify that on March 14, 2019, I electronically filed the foregoing document with the			
3	Clerk of the Court using the CM/ECF system, which will send notification of such filing to the			
4	CM/ECF participants registered to receive service in this MDL.			
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6	/s/ Aimee Wagstaff Aimee H. Wagstaff			
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	- 3 - PLAINTIFF'S RESPONSE TO PRETRIAL ORDER NO. 111, SCOPE OF DR. BENBROOK'S TRIAL TESTIMONY			