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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: ROUNDUP PRODUCTS LIABILITY
LITIGATION

MDL No. 02741

**PLAINTIFFS' AMENDED NOTICE TO
TAKE THE VIDEOTAPED ORAL
DEPOSITION OF ROGER MCCLELLAN**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Hon. Vince Chhabria

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT pursuant to Rule 45 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their undersigned attorneys, will take the deposition of Roger McClellan, a third-party, beginning on Wednesday, February 6, 2019 at 8.30 a.m. P.T., and to continue day to day, Sundays and holidays excepted, until completed. The deposition(s) will be held at the offices of Modrall Sperling, located at 500 4th St. NW, Ste. 1000, Albuquerque, NM 87102. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Fed. R. Civ. P. 28, and may also be videotaped.

DATED: January 16, 2019.

Respectfully submitted,

By: /s/ R. Brent Wisner
R. Brent Wisner, Esq. (SBN: 276023)
rbwisner@baumhedlundlaw.com
BAUM, HEDLUND, ARISTEI, & GOLDMAN, P.C.
10940 Wilshire Boulevard, 17th Floor

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AMENDED NOTICE OF DEPOSITION OF ROGER MCCLELLAN
16-MD-02741-VC

EXHIBIT 2
WIT: McClellan
DATE: 2/6/19
D. Srebreinick, CRR, CLR

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Los Angeles, CA 90024
Telephone: (310) 207-3233
Facsimile: (310) 820-7444

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CERTIFICATE OF SERVICE

I, certify that I have served a copy of the foregoing AMENDED NOTICE OF DEPOSITION OF ROGER MCCLELLAN and upon all opposing counsel of record by electronic mail and/or by placing a copy of same in the U.S. Mail, first class, postage prepaid, this 16th day of January, 2019.

/s/ R. Brent Wisner
R. Brent Wisner

Responses to Subpoena
“Roundup Products Liability Litigation – Civil Action No. 3:16-MD-2741-VC”
Served on Roger O. McClellan on November 26, 2018

The Subpoena identified above was served on November 26, 2018 on Roger O. McClellan, Editor-in-Chief of Critical Reviews in Toxicology, an international journal published by Taylor and Francis. Attachment A to the Subpoena contains a section identified as “Documents and Things to be Produced” including a list of 19 items.

This document is a summary of the responses to the 19 items.

- (1) All agreements and contracts between YOU and Monsanto

Response:

There are no past or current agreements or contracts between Roger O. McClellan and Monsanto.