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Gregory Bush

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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14

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16 IN RE: ROUNDUP PRODUCTS LIABILITY
LITIGATION

MDL NO. 2741

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

17
18 THIS DOCUMENT RELATES TO:

19 *Ramirez, et al. v. Monsanto Co.*, Case No.
20 3:19-cv-02224

**NOTICE OF JOINDER IN EX PARTE
APPLICATION TO EXTEND DEADLINE
TO FILE RESPONSE TO MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT, APPOINTMENT OF
INTERIM CLASS AND SUBCLASS
COUNSEL, DIRECTION OF NOTICE
UNDER FED. R. CIV. P. 23(e),
SCHEDULING OF A FAIRNESS
HEARING, AND STAY OF THE FILING
AND PROSECUTION OF ROUNDUP-
RELATED ACTIONS BY SETTLEMENT
CLASS MEMBERS**

The Honorable Vince Chhabria

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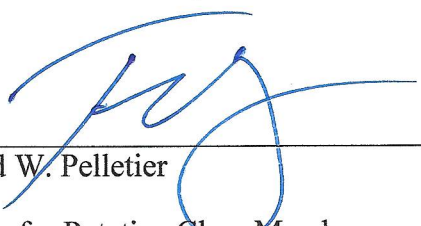
PLEASE TAKE NOTICE THAT putative class member Gregory Bush respectfully joins in putative settlement class member Tracie Ward’s request for an extension of time to file a response to the pending Motion for Preliminary Approval of Class Settlement, Appointment of Interim Class and Subclass Counsel, Direction of Notice under Fed. R. Civ P. 23(e), Scheduling of a Fairness Hearing, and Stay of the Filing and Prosecution of Roundup-Related Actions by Settlement Class Members, (ECF No. 11042) (the “Motion for Preliminary Approval”) for 25 days, up to and including August 7, 2020.

As stated in Ms. Ward’s moving papers, the proposed class action settlement threatens to affect “hundreds of thousands or even millions of persons who have been exposed to Roundup, may or may not have manifested NHL symptoms, and have not commenced an individual personal injury action or retained counsel to do so.” (ECF No. 11042 at p. 13). Yet, it has never before been attempted in the history of American jurisprudence. It raises “unique” and profound questions not only under Rule 23, but also under federal statutes and the U.S. Constitution. It could have a dramatic effect not only on this litigation but on the future of mass tort litigation. For the reasons set forth in Ms. Ward’s motion, Gregory Bush respectfully urges this Court to extend the time for all interested parties to respond to the Motion for Preliminary Approval so their concerns can be thoughtfully and thoroughly presented to the Court now before a great deal of time and money is expended—and perhaps wasted—on notice to the settlement class and the expected litany of objections from class members.

DATED: July 5, 2020

Respectfully submitted,

KAZAN, McCLAIN, SATTERLEY & GREENWOOD
A Professional Law Corporation

By: 

Ted W. Pelletier
Attorneys for Putative Class Member
Gregory Bush

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DATED: July 5, 2020

Respectfully submitted,

THE HOFFMAN LAW FIRM

By: 
Shepard Hoffman

Attorneys for Putative Class Member
Gregory Bush

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CERTIFICATE OF SERVICE

In Re: Roundup Products Liability Litigation
MDL No. 2741

U.S. District Court, Northern District of California Case No. 3:16-MD-02741

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is Jack London Market, 55 Harrison Street, Suite 400, Oakland, CA 94607.

On July 5, 2020, I served true copies of the following document(s) described as:

NOTICE OF JOINDER IN EX PARTE APPLICATION TO EXTEND DEADLINE TO FILE RESPONSE TO MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT, APPOINTMENT OF INTERIM CLASS AND SUBCLASS COUNSEL, DIRECTION OF NOTICE UNDER FED. R. CIV. P. 23(e), SCHEDULING OF A FAIRNESS HEARING, AND STAY OF THE FILING AND PROSECUTION OF ROUNDUP-RELATED ACTIONS BY SETTLEMENT CLASS MEMBERS

on the interested parties in this action as follows:

SEE PARTIES ON CM/ECF SYSTEM

BY CM/ECF NOTICE OF ELECTRONIC FILING: I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 5, 2020, at Richmond, California.

/S/ [Paula Katayanagi]
Paula Katayanagi