

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS  
LIABILITY LITIGATION

MDL No. 2741

Case No. 16-md-02741-VC

This document relates to:

*Sheller v. Bayer AG, et al.*, Case No. 3:19-  
cv-07972

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

**[PROPOSED] ORDER GRANTING  
PLAINTIFF AARON SHELLER'S  
SECOND RENEWED MOTION TO  
APPOINT FEGAN SCOTT LLC AS  
INTERIM CLASS COUNSEL FOR  
THE MEDICAL MONITORING  
CLASS**

The Court has considered Plaintiff Aaron Sheller's Second Renewed Motion to Appoint Fegan Scott, LLC as Interim Class Counsel for the Medical Monitoring Class and orders as follows.

1. Plaintiff's motion is granted.
2. The Court appoints Fegan Scott LLC as Interim Class Counsel for the putative Medical Monitoring Class.
3. The Court directs that Interim Class Counsel shall have the responsibility for coordinating and prosecuting the claims of the Medical Monitoring Class. Specially, Interim Class Counsel shall have the authority and the duty to:
  - a. Propose agenda items for case management conferences and appear at case management conferences and hearings;
  - b. Coordinate with Plaintiffs' Co-Lead Counsel, Plaintiffs' Executive Committee, and Plaintiffs' Liaison Counsel;
  - c. Draft case management orders for the orderly and efficient litigation of the Medical Monitoring Class case;

- d. Enter into stipulations with Defendants on behalf of the Medical Monitoring Class;
- e. Sign and file all pleadings relating to the Medical Monitoring Class;
- f. Determine the Medical Monitoring Class's position on matters arising during the pretrial proceedings, and present that position in pleadings, briefs, motions, oral argument, or as otherwise appropriate, personally or by a designee;
- g. Coordinate and conduct discovery on behalf of the Medical Monitoring Class, consistent with the requirements of the Federal Rules of Civil Procedure and the Local Rules of the Northern District of California;
- h. Liaise with defense counsel on behalf of to the Medical Monitoring Class;
- i. Engage in settlement negotiations with the defendants on behalf of the Medical Monitoring Class;
- j. Consult with and employ expert witnesses on behalf of the Medical Monitoring Class;
- k. Enter into contracts and other agreements with expert witnesses or vendors as necessary to litigate this case;
- l. Maintain and collect time and expense records for work performed, time billed, costs incurred, and other disbursements made by plaintiffs' counsel whose work has been specifically authorized by Interim Class Counsel for the Medical Monitoring Class;
- m. Otherwise coordinate the work of all plaintiff's counsel with respect to the Medical Monitoring Class, and perform such other duties as the lead counsel deem necessary, in order to advance the Class's litigation or as authorized by further order of the Court; and
- n. Perform any other necessary administrative or logistic functions attendant to the Medical Monitoring Class and carry out any other duty ordered by the Court.

**IT IS SO ORDERED.**

Dated:

\_\_\_\_\_  
Hon. Vincent Chhabria

United States District Judge