

# EXHIBIT A



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**CONFIDENTIAL PURSUANT TO PTO 200 and FRE 408**

August 20, 2020

**Via E-mail**

Honorable Vince Chhabria  
United States District Court, Northern District of California  
[Vccrd@cand.uscourts.gov](mailto:Vccrd@cand.uscourts.gov)


**RE: *Response to Pretrial Order No. 216***

To the Honorable Vince Chhabria,

This letter is Andrus Wagstaff, PC’s confidential response to Pretrial Order No. 216, ECF 11293. On January 21, 2020 this Court entered PTO 200, wherein it reminded the parties that all “settlement discussions in this MDL are confidential and that the Court will not hesitate to enforce the confidentiality requirements with sanctions.” Undersigned counsel also believes the confidentiality provisions of FRE 408 require the contents of this letter remain confidential. Further, given the sensitive moment we are facing in this litigation, public disclosure of the contents of this letter could jeopardize any future settlement discussions between Monsanto and Andrus Wagstaff, PC.

**Andrus Wagstaff, PC**

[REDACTED]



Andrus Wagstaff has three Wave 1 cases and requests the Court rule on all pending motions and either remand them for trial or consolidate them for trial before your honor in the Northern District:

1. *Giglio v. Monsanto*, 3:16-cv-05658;
2. *Russo v. Monsanto*, 3:16-cv-06024; and
3. *Perkins v. Monsanto*, 3:16 -cv-06025.

Aimee Wagstaff will be prepared to discuss the contents of this letter during the August 27, 2020 case management conference or during a Rule 408 settlement conference should the Court want more details.

/s/ Aimee H. Wagstaff, Esq.

**Cc via e-mail:**

Brian Stekloff, Esq  
William Hoffman, Esq  
Julie du Pont, Esq  
Lana Varney, Esq  
Vance Andrus, Esq  
Robin Greenwald, Esq  
Mike Miller, Esq  
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