Gerson H. Smoger
SMOGER &ASSOCIATES
13250 Branch View Lane
Dallas, TX 75234
Telephone: (510) 531-4529
Facsimile: (510) 531-4377)
gerson@texasinjurylaw.com

Steven M. Bronson, Esq. (SBN 246751)
THE BRONSON FIRM APC
7777 Fay Avenue, Suite 202
La Jolla, CA 92037
Telephone: 619-374-4130
Facsimile: 619-568-3365
sbronson@thebronsonfirm.com

Counsel for Objector Melinda Sloviter

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION This document relates to: Ramirez, et al. v. Monsanto Co. Case No. 3:19-cv-02224	MDL No. 2741 Case No. 16-md-02741-VC **BRIEF IN OPPOSITION TO MOTION FOR PRELIMINARY APPROVAL BY OBJECTING CLASS MEMBER MELINDA SLOVITER AND MOTION TO STRIKE THE DECLARATION OF AMIT R. MEHTA, M.D.** Re: Dkt. No. 12531 Date: March 31, 2021 Time: 10:00 AM Place: Courtroom 4, 17th floor Judge: Honorable Vince Chhabria

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

Cases

Statutes & Rules

Other Authorities

I. INTRODUCTION

There can be no doubt that proposed class counsel ("settlement proponents") have vast experience in both class actions and the resolution of large-scale litigation.[1] And the settlement that has been negotiated with Monsanto is facially appealing, as any settlement with a projected 2 billion dollars in payments would be. This brief is then not written to contest the good faith of those who negotiated a settlement in order to attempt to craft a proposed solution to Monsanto's problem of long-term future litigation. Rather, this brief is written to address serious constitutional and fairness concerns the proposed settlement raises.

Unlike other mass settlements, no one involved in the negotiation of the proposed massive individual Roundup settlement, estimated by Bayer to be up to 9.6 billion dollars,[2] nor any counsel with significant involvement in the Roundup litigation, is proffering this proposed resolution. Generally, such proposed resolutions, even when deficient, are crafted by those working in the trenches of a particular litigation. Here, settlement proponents have not tried a Roundup case or prepared to go to trial, have not taken any depositions in a Roundup case, have not conducted any discovery in a Roundup case, nor have they argued any motions before this Court.

Thus, one thing that appears to be clearly missing from the proposed settlement is experience in the intricacies of toxic tort trial practice. When it is viewed from the perspective of a toxic tort trial practitioner with experience representing individuals harmed by toxic

[1] Objector Melinda Sloviter was exposed to Roundup before February 3, 2021. Before objecting to this proposed settlement, she had not filed a lawsuit against Defendants nor had she retained counsel before February 3, 2021.

[2] Bayer Annual Report 2020 (Feb. 25, 2021), *available at* https://www.bayer.com/sites/default/files/2021-02/Bayer-Annual-Report-2020.pdf

substances, rather than classes, it becomes clear this settlement is woefully deficient. *See* Declaration of Gerson H. Smoger, attached hereto as Exhibit "A."

Below, many of this settlement's intricacies will be discussed in some detail to display the broad nature of the settlement's deficiencies, including the breadth of those proposed to be included as part of the settlement, the byzantine claims process, the truncated ability for class members to leave the settlement's confines and try their cases in court, and the inadequacy of the general benefits supposedly afforded to class members and the public at large. At bottom, this settlement is neither constitutionally permissible not substantively fair to putative class members.

II. CONSTITUTIONAL REQUIREMENTS DO NOT ALLOW SUBCLASS 2 TO BE CERTIFIED

In *Amchem Products, Inc. v. Windsor*, 521 U.S. 591 (1997), the inquiry into the propriety of a future personal injury class began by looking at the historical roots of class actions under Rule 23. The Supreme Court found that the drafters of Rule 23 "had dominantly in mind vindication of 'the rights of groups of people who individually would be without effective strength to bring their opponents into court at all.'" *Amchem*, 521 U.S. at 617 (quoting Kaplan, *A Prefatory Note*, 10 B.C. Ind. & Com. L. Rev. 497, 497 (1969)). The Court then cited with approval language from what was then a recent Seventh Circuit opinion: "The policy at the very core of the class action mechanism is to overcome the problem that small recoveries do not provide the incentive for any individual to bring a solo action prosecuting his or her rights." *Id.* (quoting *Mace v. Van Ru Credit Corp.*, 109 F.3d 338, 344 (7th Cir. 1997)). But small value cases are not at issue here. Roundup Non-Hodgkin's Lymphoma ("NHL") cases have significant trial value. Hundreds of attorneys have already demonstrated that Roundup NHL victims have individual claims worth pursuing outside a class action.

Also, while binding many class members to a settlement or judgment is a necessary corollary to allowing persons with sufficiently similar claims to be aggregated into a class, it is the binding of absent members that has consistently troubled courts from a constitutional and due process perspective. To do so, case law, Rule 23, and constitutional due process require that certain parameters be met. One of these is that class representatives who bring an action themselves have a current justiciable claim pursuant to Article III of the Constitution. A second is that those that the class action seeks to bind are afforded proper notice. Finally, constitutional infirmities cannot be buried behind multiple subclasses. If the class is divided into subclasses, the text of Subsection (c)(5) states: "When appropriate... a class may be divided into subclasses *that are each treated as a class* …." Fed. R. Civ. P. 23(c)(5) (Italics added). Here, none of the class representatives of Subclass 2 ("who have not been diagnosed with NHL as of February 3, 2021, and their Derivative Claimants" (Mot., 8)) have a justiciable "claim or controversy," as required by Article III, and the vast breadth of Subclass 2 renders constitutionally required notice impossible.

A. Article III's Requirement of a Case or Controversy is Not Met by Subclass 2.

Article III of the Constitution confines federal judicial power to "Cases" or "Controversies." This limit preserves the separation of powers by confining courts to their proper adjudicative function and preventing advisory opinions that would intrude on the legislative and policy making functions that the Constitution assigns to Congress and the President. *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 559-60 (1992). Article III requirements apply no differently in class actions than in ordinary litigation. The class action is a procedural device that cannot alter the separation-of-powers commands of Article III any more than it can alter or confer substantive rights. *Amchem*, 521 U.S. at 613; *Ortiz v. Fibreboard* Corp., 527 U.S. 815, 865

(1999) (Rehnquist, C.J., concurring). Accordingly, a court may neither certify a class nor render a class judgment with respect to persons whose claims are outside its Article III power.

The "irreducible constitutional minimum" of standing under Article III requires that 1) the plaintiff suffers from a concrete injury in fact; 2) the injury is fairly traceable to the alleged conduct of the defendant; and 3) the injury is likely to be redressed by a favorable decision. *Lujan*, 504 U.S. at 560-61. Here, any individual action brought by any of the Subclass 2 proposed class representatives would not be possible, because their claims have not yet arisen. Given that NHL is the only individual claim made as part of this class action, the claims for any member of Subclass 2 by definition have not yet occurred. They, therefore, fail the injury-in-fact test: the invasion of a legally protected interest that is (a) concrete and particularized, and (b) actual or imminent, not conjectural or hypothetical. *See id*. Whether they will develop NHL in the future is entirely unknown. But this potential injury is not "concrete" in either a "qualitative [or] temporal sense." *Whitmore v. Arkansas*, 495 U.S. 149, 155 (1990). See also *Spokeo, Inc. v. Robins*, 136 S. Ct. 1540, 1547 (2016), reconfirming *Lujan* (In order to have standing under Article III, "[t]he plaintiff must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of the defendant, and (3) that is likely to be redressed by a favorable judicial decision.").

Injury-in-fact is lacking here because no class representative or any class member has a present claim or controversy to litigate. No Subclass 2 proposed representative has a diagnosis of NHL that can be redressed at the present time. Unaccrued, contingent tort claims do not meet the requirements of Article III, and permitting federal courts to adjudicate them undermines the adversarial system that Article III preserves and on which the legitimacy and accuracy of judicial decision-making depends. Subclass 2 does not meet the constitutional requirements of Article III.

B. Notice to the Impossibly Broad Subclass 2 "Future Only Claimants," is Inherently Deficient.

The proposed membership of Subclass 2 is likely broader than any class action that has ever been certified. With certain caveats, artfully designed to bring this class action without disturbing the clients retained by the vast number of lawyers already before this Court, Subclass 2 includes all people who "have been exposed to Roundup Products through the application of Roundup Products." *See* Settlement Agreement, § 1.1(a), Dkt. 12531-2, pp. 6-7 of 266. To make this breadth abundantly clear, the settlement agreement provides the most expansive reading possible of "application": "Exposure 'through the application of Roundup Products' includes exposure through mixing and any other steps associated with application, *whether or not the individual performed the application, mixing, or other steps* associated with application himself or herself." (Emphasis supplied). *See id*. Both perversely and quite unbelievably such exposure is without time constraints, either in the past ***or in the future***:

> Section 12.8 Settlement Class Members' Subsequent Exposures. For the avoidance of doubt, if a Settlement Class Member is further exposed to Roundup Products on or after February 3, 2021, the evidentiary use under Section 12.3, the Releases under Article XVII, and the stay described in Section 18.2(b)(i) shall apply to Claims arising from, resulting from, in any way relating to or in connection with such exposure to the same extent as Claims arising from, resulting from, in any way relating to or in connection with exposure prior to February 3, 2021.

Id. at p. 73 of 266. Essentially, if a mother sits in her yard while her husband applies Roundup for one day, her future exposure to Roundup for the rest of her life is covered by this proposed settlement.

Settlement proponents' papers and the settlement agreement make this breadth clear:

> Roundup is used in residential garden and lawn care, large properties such as golf courses, schools, universities and parks, and within the entire agricultural industry. The ubiquity of Roundup requires a comprehensive notice program in the U.S., U.S. territories and possessions, and Mexico.

See Preliminary Approval Motion, Dkt. 12531, p. 31 of 83. Note that the word "*ubiquity*" was chosen by settlement proponents themselves. Indeed, this ubiquity is further demonstrated by their description of where notice needs to go:

> Farms in counties w/ 1,000+ farmworkers, Businesses/Organizations (e.g., greenhouses, herbicide consultants, weed control, vineyards, farm labor/management/organizations/services, landscape, grounds maintenance, sports fields, cemeteries, garden centers, golf courses, schools/universities, Diplomatic establishments, and Government entities (building directors, weed supervisors, public works directors).

Id.

The inherent difficulties of conveying meaningful notice to large numbers of unknown, exposure-only class members was immediately apparent to this court. *See* Pretrial Order No. 214: Denying Motions To Alter Schedule On Motion For Preliminary Approval, Dkt. 11182. Overriding the detailed efforts to inform members of this proposed class is the fact that, by definition, the members of Subclass 2 have no symptoms of disease nor any existing legal representation. Even if it were theoretically possible to provide notice to this diffuse class, the vast majority will disregard notices they assume are inapplicable to them. Apprising healthy class members of their opportunity to be heard and participate in the proceedings is a meaningless gesture. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314-15 (1950) ("when notice is a person's due, process which is a mere gesture is not due process."). Basic information that is crucial and typically available at the time that a plaintiff's cause of action accrues – at minimum here the diagnosis of NHL, the nature and seriousness of NHL, the medical and other costs it will entail, its impact on life and livelihood – are all lacking. And giving meaningful notice regarding future exposure should be relegated to the theatre of the absurd.

The lower court in the *Amchem* litigation found that obstacles to providing adequate notice to future victims were "insurmountable." *Georgine v. Amchem Products, Inc.,* 83 F.3d 610, 633 (3rd Cir. 1996), *aff'd,* 521 U.S. 591. Although the U.S. Supreme Court has not ruled on this issue definitively, Justice Ginsberg, for the Court, recognized "the gravity of the question whether class action notice sufficient under the Constitution and Rule 23 could ever be given to legions so unselfconscious and amorphous." *Amchem,* 521 U.S. at 628. See also *In re "Agent Orange" Prod. Liab. Litig.,* 996 F.2d 1425, 1435 (2d Cir. 1993), *cert. denied*, 510 U.S. 1140 (1994) (providing an opt-out right to a person "unaware of an injury would probably do little good."), *abrogated in part on other All Writs Act grounds*, *Syngenta Crop Prot., Inc. v. Henson*, 537 U.S. 28, 31 (2002); *Dow Chemical Co., v. Stephenson,* 273 F.3d 249, 261 n.8 (2001) ("We also note that plaintiffs [who had no injury at the time of notice] likely received inadequate notice. *Shutts* provides that adequate notice is necessary to bind absent class members. [*Phillips Petroleum Co. v. Shutts*, 472 U.S. 797, 812 (1985)]. As described earlier, *Amchem* indicates that effective notice could likely not ever be given to exposure-only class members. *Amchem*, 521 U.S. at 628."), *affirmed in part, with the companion Isaacson case vacated due to the use of the All Writs Act to effectuate removal jurisdiction*, 539 U.S. 111 (2003).

Class action notice programs are often met with low response rates even when money or other tangible relief might actually be going to members of the class. In 2015 the Consumer Financial Protection Bureau reviewed 105 settlements and found a median claims rate of 8%.[3] When the Federal Trade Commission reported on a similar survey in 2019 the median rate was

[3] Consumer Protection Bureau, *Arbitration Study: Report to Congress, Pursuant to Dodd-Frank Wall Street Reform and Consumer Protection Act § 1028(a)* (2015) at 22, *available at* https://files.consumerfinance.gov/f/201503_cfpb_arbitration-study-report-to-congress-2015.pdf

9%.[4] This survey was even more telling with respect to optouts: "The percentage of consumers who excluded themselves or objected were miniscule, with weighted averages of these rates hovering at 0.0003% and 0.01%, respectively."[5] And these were in financial matters. The rates are likely to be much lower when nothing is being offered and those exposed, many unaware of their exposure, are only apprised of their right to opt out of a class action covering a future injury that for each individual is unlikely to occur. Due process cannot tolerate this result.

III. THE PROPOSED PAYMENTS TO NHL VICTIMS ARE WOEFULLY INADEQUATE AND POORLY EXPLAINED

A. The Paltry Accelerated Payment Awards.

The settlement initiates what it describes as an "Accelerated Payment Award." This award may be requested if the claimant: 1) provides required proof of exposure; 2) that the first exposure occurred more than 12 months before diagnosis; and 3) a "Qualifying Diagnosis" of NHL prior to 2026. *See* Settlement Agreement, § 6.1(a)(ii), Dkt. 12531-2, p. 27 of 266. After certain quite complicated administrative steps, a claimant may receive the sum of $5000, *id.* at § 6.2(a)(i), and is then required to sign a full individual release of claims, *id.*, § 6.2(a)(i)(3).

Nowhere in the proposed settlement agreement do counsel explain why this paltry sum of $5000 is being made available in exchange for a *full release* of all claims from someone suffering with a life-threatening form of cancer. Nor does it explain this sum in relation to the jury verdicts already obtained to date. No doubt Monsanto knows that desperate and sick people might need such an expedited infusion of cash. Certainly, it is worth it to Monsanto to remove

[4] Federal Trade Commission, *Consumers and Class Actions: A Retrospective and Analysis of Settlement Campaigns* (Sep. 2015) at 22, *available at* https://www.ftc.gov/system/files/documents/reports/consumers-class-actions-retrospective-analysis-settlement-campaigns/class_action_fairness_report_0.pdf

[5] *Id.* at 22.

these potential claims from its books. Furthermore, nowhere does this settlement explain how the sum of $5000 was arrived at nor why this amount is in the best interests of desperate, likely low wage people suffering from a life-threatening illness. It appears that Monsanto has negotiated a trap for the unwary to limit its own financial risk.

B. The Compensation Grid is Byzantine, Deficient in Explanation, and Inadequate.

Paragraph 1(e) of the District Court's Procedural Guidance for Class Action Settlements states that the court must be provided: "The anticipated class recovery under the settlement, the potential class recovery if plaintiffs had fully prevailed on each of their claims, and an explanation of the factors bearing on the amount of the compromise." There has really been no reasoned attempt to do this. Absent that, there is no ability to discern the basis for the four-tiered compensation grid which constitutes the settlement's major estimated expenditure. Nor is there any attempt to explain the monetary reasons behind the establishment of each NHL tier. Basically, the putative class members are asked to believe that the completed grid is some bizarre form of *res ipsa loquitur*. But how the monetary offers in this grid were arrived at or how numbers were allocated to different tiers do not in any way speak for themselves.

In dissecting the compensation grid, it appears to be divided into four tiers with each claimant seeking to achieve placement in the highest tier possible. The tiers are strictly defined by four placement factors and only one element needs to exist in order to place a claimant into the lowest possible tier for compensation purposes. The consistent factor for each tier can be abbreviated, albeit without specificity: 1) the older a claimant is at the time of diagnosis, the lower the compensation; 2) the shorter the time of exposure, the lower the compensation; and 3) the less severe the current progress of the disease is, the lower the compensation. In addition to these, those with NHL are relegated to no more than Tier 2 (maximum $25,000) if they have

ever suffered from virtually any medical condition ever associated with NHL (*See* Settlement Agreement, Exhibit 5, Dkt. 12531-2, p. 186 of 266, regardless of severity or time of the condition's diagnosis. Absent any of these factors and after fulfilling the age, exposure, and disease severity criteria for Tier 3, claimants cannot move up further than Tier 3 if any factor that has ever been shown to be associated with NHL in any epidemiological study, *see id.*, including 14 different occupations without respect to time worked, can be checked off -- irrespective of whether there is a scientific consensus on such factors, *see id*. at p. 188 of 266.

The Tier 3 relegating factors are noteworthy. A brief look at just some of these factors makes it clear that it is almost impossible for a claimant to rise beyond Tier 3 with its range of $25,000 to $65,000. One relegating factor is whether any first or second degree relative ever had cancer --- basically whether any parent, sibling, child, aunt, uncle, grandparent, grandchild, niece, nephew, or half-sibling ever had cancer.[6] Given that approximately 39.5% of people will be diagnosed with cancer in their lifetimes, those relegated to no greater than Tier 3 under this criterion alone will likely be everyone but orphans.[7] Another common factor relegating a claimant to Tier 3 is obesity, which is common throughout the population at all age levels, (prevalence 40% aged 20-39, 44.8% aged 40-59, and 42.8% aged 60 and older).[8] Diabetes is a disease suffered by 10.5% of the U. S. population.[9] Moreover, if it were even possible to pass

[6] National Cancer Institute, *Second-Degree Relative*, *available at* https://www.cancer.gov/publications/dictionaries/genetics-dictionary/def/second-degree-relative
[7] National Cancer Institute, *Cancer Statistics* (Sep. 25, 2020), *available at* https://www.cancer.gov/about-cancer/understanding/statistics
[8] Craig M. Hales, et al., *Prevalence of Obesity and Severe Obesity Among Adults: United States, 2017-2018*, NCHS Data Brief, no. 360, National Center for Health Statistics (Feb. 2020) *available at* https://www.cdc.gov/nchs/products/databriefs/db360.htm
[9] Centers for Disease Control and Prevention, *National Diabetes Statistics Report 2020: Estimates of Diabetes and Its Burden in the United States*, *available at* https://www.cdc.gov/diabetes/pdfs/data/statistics/national-diabetes-statistics-report.pdf.

these hurdles, Tier 4 requires an NHL diagnosis before the age of 45, ignoring latency,[10] and the frequency of exposure criterion requires a minimum exposure in excess of 60 months (or 20 years for a seasonal worker spraying three months a year). Given these criteria, Monsanto hardly has to worry about Tier 4 payments which might have been why until settlement proponents' March 3, 2021, amendment only those eligible for Tier 4 could seek extraordinary relief under the proposed settlement. *See* Settlement Agreement, § 6.2(a)(ii)(1), Dkt. 12531-2, p. 29 of 266.[11]

The minimal compensation offered pursuant to this grid is demonstrated by the four people who have gone to trial: Dewayne Johnson, Mr. and Mrs. Pilliod, and Edwin Hardeman. Collectively, if each of them received the highest award they qualify for under the class compensation structure, none of the four's maximum would be more than $25,000. Mr. and Mrs. Pilliod would each come in at Tier 2, because Mr. Pilliod was born on May 5, 1941 and Mrs. Pilliod was born on April 17, 1944. Edwin Hardeman would come in at Tier 2, because he was born on July 20, 1948. By age alone Dewayne Johnson would be Tier 4, but he would be relegated to Tier 2 because he did not have more than 36 months of exposure.[12] In other words,

[10] NHL's age prevalence pattern is similar to that of other environmental toxins. The main cause of malignant mesothelioma is working with asbestos as to which 72 years old is the mean age at the time of diagnosis. *See* American Cancer Society, *Key Statistics About Malignant Mesothelioma* (Jan. 9, 2019) *available at* https://www.cancer.org/cancer/malignant-mesothelioma/about/key-statistics.html. Lung cancer is highly associated with smoking and the mean age at the time of diagnosis is 70. *See* American Cancer Society, *Key Statistics for Lung Cancer* (Jan. 12, 2021) *available at* https://www.cancer.org/cancer/lung-cancer/about/key-statistics.html. As tobacco use and asbestos exposure indicate, delayed onset is often a matter of latency, not causation.

[11] Under the amendment the administrator now has discretion over all four tiers. However, the amendment sets no criteria for this discretion. Nor does it explain why the change was made. The result only makes the settlement more amorphous with the exception of one constant – none of Monsanto's overall payment obligations appear to change.

[12] Johnson started working on the job where he was exposed to Roundup in June 2012 and he first went to see a doctor about his developing rash in July 2014. *See Johnson v. Monsanto Co.*, 52 Cal. App. 5th 434, 437-38 (2020)

rather than the over $2 billion in verdicts these plaintiffs received collectively, with this class Monsanto would only have had to pay a maximum of $100,000 in total to all four plaintiffs.[13]

Further, the payment structure does not take into account pain and suffering or the extent of treatment. It makes it irrelevant whether or not after NHL diagnosis someone had multiple years and/or multiple courses of chemotherapy and/or radiation, stem cell transplant, CAR-T therapy, or all of them. Nor does it account for possible disabilities caused by NHL, such as going blind, never being able to walk again or any other future limitations.

C. Evidentiary Support for the Proposed Settlement Grid is Lacking.

The motion bases the grid on the declarations of settlement proponents expert Amit Mehta, M.D., and Monsanto's expert, Michael L. Grossbard, M.D. These declarations on their own demonstrate the patently unequal abilities of Monsanto and settlement proponents to negotiate this highly complex deal, one that requires knowledge of epidemiology, toxicology, and medicine. Settlement proponents' expert Dr. Mehta presents an incompetent declaration which rather than giving the basis for each grid factor, merely provides summary approval. It should be stricken by this Court. Monsanto's expert's declaration cannot be the basis for settlement proponents' argument that the established grid along with all of its caveats and

[13] *See Hardeman v. Monsanto Co.*, 385 F. Supp. 3d 1042, 1048 (N.D. Cal. 2019) (compensatory damages set at $5 million; punitive damages reduced from $75 million to $20 million); *Johnson v. Monsanto Co.*, No. GC16550128, 2018 WL 5246323, at *5 (Cal. Super. Oct. 22, 2018) (compensatory damages set at $39.25 million; punitive damages reduced from $250 million to $39.25 million); *Johnson*, 52 Cal. App. 5th at 463 (2020) (compensatory damages reduced to $10.25 million; punitive damages reduced further to $10.25 million); *Pilliod v. Monsanto Co.*, No. RG-17-862702, 2019 WL 3540107, at *12 (Cal. Super. July 26, 2019) (compensatory damages for two plaintiffs set at $6.1 million and $11.2 million; punitive damages reduced from $1 billion each to $24.6 million and $44.8 million).

exclusions is appropriate for the putative class. This court should expect an independent review from settlement proponents. Dr. Grossbard's affidavit should be disregarded.

1. The Testimony of Class Proponent's Expert, Amit R. Mehta, M.D., Is Neither Relevant nor Reliable and, Thus, Fails Under *Daubert*.

Dr. Mehta's declaration should be stricken. Neither he nor it can survive any possible examination pursuant to Fed. R. Evid. 702 and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579, 592-93 (1993).[14] Here, it is unclear what Dr. Mehta based his opinions on or what qualifies him to render any opinions on the relationship of glyphosate to NHL, much less its potential confounders described within the tiers. *See Ellis v. Costco Wholesale Corp.*, 657 F. 3d 970, 982 (9th Cir. 2011), holding that *Daubert* applies at the class certification stage.

On his "Linked in" page, Dr. Mehta describes his work since 2016 as "Expert Physician Consultant: Advising Investors in the Oncology Disease Space." He also advertises himself as a "Medical Expert Witness for Legal casework in Hematology/Oncology - advised on numerous cases nationally." Additionally, he works as the "CMO and Co-Founder of FoodyMD: Evidence-Based Cancer Nutrition. Empowering physicians and the public with data-driven knowledge of foods with anti-cancer nutritional value."[15] What Dr. Mehta does not do is any work or study related to herbicides nor does he have any research experience in herbicide toxicology or epidemiology. He is also not someone who has done scientific research related to NHL epidemiology nor has he contributed to any studies about NHL. Dr. Mehta describes his research

[14] *Daubert* clearly applies to motions in support of class certification, as the Ninth Circuit in *Grodzitsky v. American Honda Motor Co., Inc.*, 957 F.3d 979, 986-87 (9th Cir. 2020) affirmed the exclusion of an expert offered in support of class certification where the expert's testimony suffered from scientific and methodological flaws despite being based on general principles.

[15] *See* Amit Mehta, LinkedIn, *available at* https://www.linkedin.com/in/amit-mehta-436b2081; https://www.doximity.com/pub/amit-mehta-md-30a272cf (last visited Mar. 1, 2021). *See also* Amit R. Mehta, MD, Doximity, *available at* https://www.doximity.com/pub/amit-mehta-md-30a272cf (last visited Mar. 1, 2021).

focus as: "Disease conditions involved in research including prostate, lung, breast, kidney, and leukemia." C.V. of Amit R. Mehta, M.D., Dkt. 12531-19, p. 3 of 6. Notably, lymphomas are not even mentioned. In fact, the one cancer he has written about is prostate cancer. From his declaration, the only thing we do know about his past experience is that he has done a significant number of "medical expert witness reviews" and that he has worked on cases that "*include exposure to benzene* and development of NHL." *See* Declaration of Amit R. Mehta, M.D., Dkt. 12531-18, at ¶ 5 (emphasis supplied). Nowhere does his declaration or his C.V. even mention glyphosate.

Dr. Mehta's rushed four-page declaration, signed in North Carolina on the day before filing, is entirely conclusory: "My opinion … is that there are supporting scientific/medical data such that it is reasonable to include each of the conditions set forth in the Group A and Group B Medical Conditions in Exhibit 5, as posing, respectively, a significantly increased risk or a moderately increased risk of developing NHL." *See* Declaration of Amit R. Mehta, M.D., Dkt. 12531-18, at ¶ 15. There is no further evaluation or explanation regarding the many Group A and Group B factors he supports. This is astonishing in a case of this magnitude. Dr. Mehta's declaration should be stricken.

2. Class Proponent's Use of the Declaration of Monsanto Trial Expert Michael R. Grossbard, M.D. Should Be Disregarded.

The use of Dr. Grossbard as an expert is anathema to the class. Dr. Grossbard has been one of Monsanto's most frequently used expert witnesses in Roundup litigation. He was a defense witness in the Hardeman case, in the cases of *Sanders v. Monsanto* and *Calderon v. Monsanto*,[16] as well as many others. Before this court, Dr. Grossbard has already opined that it is

[16] *See In re Roundup Products Liability Litigation*, MDL No. 2741, 16-MD-2741-VC, Report of Michael L. Grossbard, M.D. RE: Edwin Hardeman, *available at*

"impossible" to conclude that exposure to "even high degrees of glyphosate" is associated with NHL.[17] Having consistently testified that NHL cannot be caused by glyphosate, Dr. Grossbard is incompetent to delineate which factors might attenuate or contribute to that causation. Any advocate for the accuracy of the grid must first believe in the underlying causation before delineating contributing factors. Indeed, from the perspective of Dr. Grossbard there should be no grid nor payments at all. His declaration should not be allowed to be used in support of the settlement's grid.

D. Claimants' Medical Costs Will Easily Eat Up Any Proceeds From the Proposed Settlement.

NHL is an expensive disease to treat. In 2019, Reyes *et. al*. found that "[d]isease progression within 12 months among patients with NHL was associated with higher mean costs compared with no disease progression ($146,185 vs. $103,498, $p < .001$),"[18] but both are substantially more than anyone in Tiers 1 through 3 are eligible to receive. However, inexplicably the settlement takes pains to make sure that medical costs are not considered, most likely for the obvious reason that these costs will be significantly higher than the amounts the grid offers claimants:

> For the avoidance of doubt, to the extent a Settlement Class Member's medical records are provided in a Claim Package or otherwise to the Claims Administrator or Settlement Administrator, such medical records are not being provided to show

---

https://www.docketbird.com/court-documents/In-re-Roundup-Products-Liability-Litigation/Exhibit/cand-3:2016-md-02741-02591-002. *See also Janzen v. Monsanto Co.*, 19-cv-4103, Deposition of Michael L. Grossbard, M.D. (Nov. 26, 2019), *available at* https://www.docketbird.com/court-documents/Janzen-v-Monsanto-Company/Exhibit/cand-3:2019-cv-04103-00025-015

[17] *See* Report of Michael L. Grossbard at 8.

[18] Carolina Reyes *et al., Cost of Disease Progression in Patients with Chronic Lymphocytic Leukemia, Acute Myeloid Leukemia, and Non-Hodgkin's Lymphoma*, The Oncologist 24(9): 1219-1228, 1223 (Sept 2019), *available at* https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6738303/

> and shall not be used to evaluate the medical costs for any medical services that a Settlement Class Member has incurred or may incur.

See Settlement Agreement, § 7.2(e), Dkt. 12531-2, p. 35 of 266.

While the proposed settlement will not consider medical costs, there is nothing to prevent hospitals, insurance companies, and governmental entities from enforcing their medical cost lien rights. Medicare and Medicaid have statutory rights to seek reimbursement and by contract so do most worker insurance plans under ERISA. The settlement indicates that there will be an attempt by the settlement administrators to negotiate with governmental entities, but it makes no promises. *See id.* §§ 16.1(a)(i), 16.2, pp. 93-94, 96 of 266. Those facing hospital or medical liens, especially those covered under ERISA, are left to fend on their own. On the other hand, one thing that the settlement does make clear is that Monsanto will have no responsibility in this regard. The release required to be signed by all those who accept settlement payments — even the paltry $5000 "Accelerated Payment Award" — releases, holds harmless, and indemnifies Monsanto from any obligations to "any Governmental Payor or any other Person, including any provider." *See id.* § 16.1(a)(ii), p. 94 of 266; *see also id.* §§ Sections 16.1(a)(i), 17.1(d), and Exhibit 6, pp. 94, 97, 192-208. The indemnification of Monsanto is made clear:

> **Notice of Indemnification.** SETTLEMENT CLASS MEMBER PARTIES ACKNOWLEDGE THAT THIS SECTION 16.3 COMPLIES WITH ANY REQUIREMENT TO EXPRESSLY STATE THAT LIABILITY FOR SUCH CLAIMS IS INDEMNIFIED AND THAT THIS SECTION IS CONSPICUOUS AND AFFORDS FAIR AND ADEQUATE NOTICE.

Id. at § 16.3(b), p. 96 of 266. Given the fact that settlement payments will almost always be less than the medical bills for NHL, it is unclear what, if any, money will be left for claimants that accept their awards.

E. The Release Required of Those Who Accept Any Payments Is Wildly Overbroad.

Class action releases comport with notice when they relate to the claims made on behalf of the class. *Hansberry v. Lee*, 311 U.S. 32, 40 (1940). Here, that claim is that Roundup can cause NHL and, given that class members are only being represented with respect to NHL, that personal injury should be the limit of what is released. *See, e.g., Taylor v. Sturgell*, 553 U.S. 880 (2008) holding there is no "virtual representation" exception to general rule against nonparty claim preclusion, abrogating *Kourtis v. Cameron*, 419 F.3d 989 (9th Cir. 2005).

However, the scope of the mandated release (Exhibit 6) required to be signed by any individual claimant who receives money, including those who get the paltry $5000 accelerated payment, is far broader than most plaintiffs are required to sign after contentious and well-represented litigation. *See* Settlement Agreement, Exhibit 6, Dkt. 12531-2, pp. 192-208. First, while the settlement offers no possible compensation for anything other than NHL, paragraph 8 is so broad that it not only releases any possible tort claim but also any possible contract claims against Monsanto. Paragraph 11 then waives all possible future claims, including an express waiver of California Civil Code Section 1542. Paragraph 12 releases all claims under California's Section 17200 and any comparable law in any other state. In paragraphs 20 and 21 claimants agree to indemnify and hold Monsanto harmless from any possible liens, including agreeing to reimbursement provisions for Monsanto, such as attorneys' fees, with the indemnity to be "construed as broadly as possible."

As if this was not comprehensive enough, every individual release also includes a mandatory non-disparagement clause:

> 27. I will not directly or indirectly make any negative or disparaging statements against Defendant or the Released Persons maligning, ridiculing, defaming, or

> otherwise speaking ill of them, their products or their business affairs, practices, policies, standards, or reputation…

See Settlement Agreement Exhibit 6, Dkt. 12531-2, p. 202 of 266.

While there are many reasons that this may benefit Monsanto, such a provision buried within a class action settlement is quite shocking and unheard of. Essentially, Monsanto is requiring any class member who accepts any money from ever speaking ill about them, particularly to the press. And given the request that the Court approve the release as part of the settlement, and Monsanto presumably only requested it in order to enforce it, Monsanto will likely use this Court's imprimatur to impose silence on unwitting settling class members. That settlement proponents have gone along with this draconian hammer for the mere pittance the proposed settlement offers the class members is equally shocking.

F. The Mirage of "Free" Legal Representation Presents More Problems Than It Solves.

A key settlement feature trumpeted by the proponents of the settlement is the "Legal Services Program," which would create a team of in-house settlement lawyers to "afford free legal advice" to the class members. *See* Settlement Agreement, § 11.3(a), Dkt. 12531-2, p. 60 of 266. But these lawyers are mistakenly described as "free" when they are actually prepaid from a legal settlement fund which should otherwise go to the injured and needy class members. And in practice, they are likely to do little more than steer claimants deeper down the rabbit hole of the pittances offered in the inadequate proposed settlement. This is because they cannot truly give reasoned advice regarding the prospects of opting out, because they are *barred* by the settlement from "represent[ing]" anyone who opts out of the settlement or who otherwise brings a tort claim against Monsanto." *Id.* at § 11.3(c), p. 61 of 266. Thus, these lawyers, purportedly in place to "advise" Roundup victims in assessing whether to participate in the settlement (or to opt out and

sue), would have no incentive to advise them to do anything other than accept the meager settlement proceeds (and help them do it). Rendering this advice, constricted as it is, does not put the claimant's interests first. Administrative help in filling out forms is not real legal representation. This preclusion thus shackles these lawyers to the lie of trumpeting the legal services plan as a purported benefit to victims who will be herded into the proposed settlement with a claimed "reduced risk" and "no need to retain counsel." Preliminary Approval Motion, Dkt. 12531, p. 22 of 83.

The intent of this provision is made more untenable by the fact that the settlement effectively prevents class members from retaining outside counsel (who might advise them to opt out). The proponents assert that class members can use the "Legal Services Program" but are "free to employ counsel of their choice." *Id.* at p. 27 of 83. In reality, no such choice exists, because the settlement limits the fees of any "outside counsel" to a mere "7.5%" of the already meager "amount awarded" under the settlement. *See* Settlement Agreement, § 6.2(d), Dkt. 12531-2, p. 30 of 266. Due to this fee cap, no outside "counsel" is likely to represent a class member in navigating the claims process.

A final provision to make sure that all advice given is to support the settlement is that no attorney in the "free legal services" program could have represented an objector. *See id.*, § 11.3(c), p. 60 of 266. Clearly, the only point to this provision is to make sure that any counsel likely to understand the faults of this settlement is precluded from representing any settlement members who are in doubt about whether to accept the settlement proceeds.

G. The Primary Purpose of the Advisory Science Panel is to Assist Monsanto in Defending Cases Against Anyone Who Does Not Accept Their Settlement.

The terms under which the science panel is required to operate are heavily weighted towards assisting Monsanto in its defense against anyone who has NHL and has the temerity to

exercise their severely attenuated back end opt-out right. The parameters of operation for the panel are so one-sided that at best it can only be assumed that the negotiators on behalf of the putative class did not understand the concepts they agreed to. Monsanto certainly understood them and likely created them as they amount to a defendant's wish list in any toxic tort litigation.

First, the science panel is predetermined to find no causation by discounting competent scientific evidence and applying the wrong analytical yardstick. The settlement requires the panel to definitively rule out "chance, bias, or confounding" causes for associations observed by scientists. *See* Section12.2(b) ("that such positive association is not due to chance, confounding, or bias"). This requirement misapprehends the science of epidemiology. Monsanto, but apparently not settlement proponents, is quite aware that these three factors cannot be ruled out by a science panel -- even if a panel reviewing all of the epidemiological data finds a positive association. Indeed, when Monograph 12 was released in 2015 and finalized in 2017 by IARC after an exhaustive review by an esteemed science panel, the epidemiology itself was concluded to be "limited," meaning that chance, bias and confounding could not be entirely ruled out.[19] This led IARC to place glyphosate into the 2A category as "probably carcinogenic to humans."[20]

Section 12.2(b) prompts the science panel to ignore the scientific evidence based on factors that are inappropriate for toxic exposure to herbicides. Dkt. 12531-2, p. 63 of 266. While epidemiological studies regarding pharmaceuticals can be interventional with confounding factors and bias controlled for in advance, including through the administration of a known dose, studies of environmental toxins are almost always observational. The toxic substance in these

[19] International Agency for Research on Cancer, *IARC Monographs Volume 112: Evaluation of Five Organophosphate Insecticides and Herbicides* (Mar. 20, 2016), *available at* https://publications.iarc.fr/549

[20] *Id.*

studies is not "administered" in pre-controlled doses and generally for most toxic substances the actual dose that enters the body is unknown. For the most part, retrospective estimates of exposure are used as surrogates for actual dose, but these estimates, however carefully obtained, are always subject to chance, bias, or confounding factors. Nor can any of the three major epidemiological techniques – cross-sectional studies, case-control studies, or cohort studies – be rendered immune from these factors. This is particularly true when the studies are done retrospectively, because the data available is not pre-controlled and is often incomplete or entirely missing. In the end, based on the entirety of studies reviewed, an observational effect may be concluded but by the very nature of the science of epidemiology such a conclusion will not be totally absent "chance, confounding, or bias." See the Declaration of George C. Rodgers, M.D., Ph.D., attached hereto as Exhibit "C," for a critical analysis of the Science Panel's directions.

This Court's own *Daubert* ruling on general causation stated that epidemiology cannot completely rule out "chance, bias, or confounding." *See In re Roundup Prod. Liab. Litig*., 390 F. Supp. 3d 1102, 1131 (N.D. Cal. 2018). But, as this court noted, that is not the end of the analysis. Rather, a positive association needs to be confirmed by information from other disciplines, such as toxicology and genotoxicity. *Id.* at 1117.

. Similarly, Sir Bradford Hill's viewpoints, given as part of his famous address, do not require that epidemiology rule out chance, bias, and confounding factors in order to find causation when there are other powerful lines of evidence to corroborate an observed association. Thus, in the MDL trial of *Hardeman*, this court found that plaintiff's expert Dr. Chris Portier's testimony "supported a credible causal interpretation," even though he "could not definitively rule out chance, bias, or confounding." *See Id.* at 1131. This court also allowed the testimony of

Dr. Weisenburger even though he could not fully rule out confounding factors in the epidemiology. *See id*. at 1144 ("In addition, Dr. Weisenburger considered other possible explanations for the observed results and, among other things, concluded that 'confounding due to the use of other pesticides does not fully explain the increased risk estimates for glyphosate' in light of the results in some studies that controlled for use of other pesticides…. None of these conclusions offends *Daubert's* requirements.")

Ironically, the settlement grid at Tiers 2 and 3 reduces compensation levels based almost entirely on a host of supposed "confounding" factors. In his affidavit, Monsanto's frequent trial expert, Dr. Grossbard, cherry picks from any study that has ever associated a medical or lifestyle finding with NHL. *See generally* Affidavit of Michael L. Grossbard, M.D. But the acknowledgment of these factors by the advocates for the settlement means that they are aware that alternative causative explanations render it impossible to completely rule out chance, bias or confounding factors. Indeed, no retrospective observational study is capable of controlling for and thereby eliminating all of these factors.

Of course, this impossible standard is a far more rigorous standard than that required by the legal system. Admissibility pursuant to *Daubert* and its progeny does not require the elimination of alternative factors. And the vast majority of jurisdictions include some version of "caused or contributed to" as part of the jury's charge when concluding whether there is causation. Notably, at least three separate trial courts have already concluded that Plaintiff's experts have passed necessary gatekeeping scrutiny. Under these circumstances, it most certainly cannot be in the interest of putative class members to take a fresh look at a matter that Monsanto has already lost over and over again.

Moreover, pursuant to the terms of the settlement, even if the science panel were to find that Roundup can cause NHL, that general causation finding is not the end of the panel's work. The next charge of the panel is to define a minimum internal dose required for Roundup to cause NHL. *See* Settlement Agreement, § 12.3(b), Dkt. 12531-2, p. 65 of 266. This determination ignores the fact that there is a marked difference between dose and exposure. Exposure is the availability of a toxic substance to enter the body whereas dose is what has actually entered the body. Distinguished from pharmaceutical studies, which can calculate an administered dose, epidemiological studies, which for environmental toxins are almost always retrospective, routinely rely on exposure estimates as surrogates for dose and this evidence is usually characterized by frequency, proximity, and duration. Indeed, even the settlement grid acknowledges that all that can be retrospectively determined is exposure and not dose, as the grid's requirements are based entirely on exposure estimates. Nor are there any persistent long-term biomarkers for glyphosate from which such a dose calculation can be retrospectively made based on degradation over time.

When dose calculations are made by regulators, they are generally made by an extrapolation from experimental, non-epidemiological data. These data are incapable of evaluating most specific human endpoints, including the human variants of NHL. The result is likely that this small group of siloed scientists will be unable to agree on a calculation that in the real world no scientists would ever attempt to authoritatively make, particularly in the absence of interventional studies which would be unethical, if not unlawful, to conduct on humans. However, if the scientists on the panel are stumped by this impossible task and cannot agree on a threshold dose needed to cause NHL, the settlement agreement inexplicably requires the panel to revert to a "no causation" finding for NHL, regardless of its earlier positive general causation

finding. *See* Settlement Agreement, § 12.3(b), Dkt. 12531-2, p. 65 of 266 ("If the Science Panel Determination does not include a threshold internal dose level for NHL, that shall be considered under the Settlement Agreement as a Causation Not Shown Finding for NHL.")

In all cases for opt outs, Monsanto will then be able to present courts and juries with its "causation not shown" finding from an "independent science panel" as a "stipulated fact." None of the juries or courts will be told that this finding was preordained by the parameters given to the panel; nor will plaintiffs' attorneys be able to cross examine members of the panel live in court while judges are even forbidden from telling juries that they are not bound by the "stipulated facts." Settlement Agreement, § 12.3(d)(iii)(3), Dkt. 12531-2, p. 66 of 266. Given these preconditions, the result of giving such a finding to any court or jury unfamiliar with the intricacies of the science will inevitably cause judges to eliminate plaintiff experts in pretrial hearings with the alternative goal being to get juries to give inordinate weight to these findings when deliberating. Monsanto knows this. *See id.,* § 12.3(d)(i-iv).

The charge to the science panel is set up in a way that, even in the unlikely event that the panel makes a positive finding of causation, trials will still be extraordinarily difficult, if not impossible to win. While the lack of a finding of general causation will likely win the day for Monsanto, Monsanto retains its ability to challenge specific causation, which means that plaintiffs will be forced to revisit many of the elements of general causation anyway. Even more significantly, if the panel has made a positive causation finding, that means the panel has assigned a threshold internal dose necessary to cause NHL. Monsanto can argue that causation cannot be proven unless the plaintiff can calculate a personal internal dose level that is greater than the agreed-upon minimum internal dose. *Id.,* § 12.3d(v).

High on the wish list of any toxic tort defendant is to require a plaintiff to prove a minimum internal dose. It is extraordinarily difficult for plaintiffs to go back years and provide evidence for just the time and duration of exposure given the frequent lack of records, witnesses, and the vicissitudes of personal recollection. Yet, even with precise exposure information, as well as its specific duration and concentration, it is impossible to calculate past internal dose. For instance, wind drift alone on a particular day can cause marked differences in an internal dose, and the number of factors that need to be accounted for make this one factor pale in comparison. But the stipulation provided to the jury will almost certainly require trials to be mired in this statistical calculation with it being plaintiff's burden to prove the impossible.

No doubt Monsanto will also argue at trial that the science panel has already considered and ruled on the scientific studies which have driven prior verdicts, arguing that any of its own conduct should not come before the jury because punitive damages are not part of the case. (See *In Re: Diet Drugs* discussion below.) As a result, the settlement's imposition of the science panel's findings as stipulated facts, the prohibition of expert discovery and cross-examination of the panel, the requirement that all courts admit the science panel's determination, and the likely argument that the jury should not be able to consider Monsanto's conduct, mean that any alleged right to a jury trial will be severely, if not irreparably, undermined.

H. The "Offer of Proof" is Designed to Disadvantage Opt-Out Cases.

Section 7.13(e) inserts another item that is uniquely beneficial to Monsanto: "the amount of last offer by the Claims Program will be treated as an offer of judgment for purposes of obligation to pay costs in the event of a tort-system judgment below that amount." Settlement Agreement, § 7.13(e), Dkt. 12531-2, p. 46 of 266. This is an automatic Rule 68 benefit that

Monsanto gets while at the same time it can argue to any court that it was the MDL court that required the offer be made and it is not in truth making such an offer in true hopes of settlement.

By structuring the "offer" in this fashion, Monsanto achieves many objectives. Class members being advised by attorneys who cannot represent them if they opt out will explain to them the downside cost risks of not accepting the offer. Thus, the provision serves to deter prospective opt-outs. Secondly, other than for those who originally opted out, trial courts will be told that Monsanto has no interest in settling but it was obligated to insert this offer, which allows Monsanto to continue to deny any liability in the particular individual action and still gain the benefits of having made the offer. Third, the cost effects of the offer of judgment begin to accrue at the beginning of the case rather than when it would normally be made in the latter stages of litigation. Finally, while Federal courts allow an Offer of Judgment pursuant to Fed. R. Civ. P. 68(a), many states do not, or the rules under which they can be made are vastly different.[21]

I. The Litigation Stay is Uniquely Beneficial to Monsanto.

The settlement includes a "litigation stay" of at least four years – subject to extension – that would bar class members from pursuing any claims against Monsanto. Settlement Agreement, § 2.1(41), Dkt. 12531-2, p. 12 of 266; Preliminary Approval Motion, Dkt. 12531, p. 30 of 83. According to the settlement proponents, this "litigation stay" is "critical to the deal." Preliminary Approval Motion, Dkt. 12531, p. 78 of 83. But on its face, such a stay violates Fed.

[21] For instance, Cal. Code Civ. Proc. § 998 in California limits the repayment to the net amount received, *see* Ga. Code Ann. § 9-11-68 and for a survey, American College of Trial Lawyers Federal Civil Procedure Committee, *Survey of State Offer of Judgment Provisions* (Oct. 2004), *available at* https://www.utcourts.gov/committees/civproc/materials/Offer%20of%20Judgment%20Survey.pdf.

R. Civ. P. 1 (applying Rules to promote "speedy" adjudication) and Fed. R. Civ. P. 23 (permitting approval of class-action settlements only if "fair, adequate, and reasonable" despite any "costs, risks, *and delay of trial* and appeal") (emphasis supplied). The main cases cited as the supposed basis for the proposed settlement included no such stay, *see, e.g.*, *In re Nat'l Football League Players Concussion Injury Litig.*, 821 F.3d 410, 423-25 (3d Cir. 2016), and the motion for preliminary approval certainly does not cite any similar settlement including such an extraordinary "standstill" provision. Indeed, the Supreme Court has held that a similarly lengthy stay was an abuse of discretion, even when it was designed to allow the President of the United States to carry out his official and all-important duties. *See Clinton v. Jones*, 520 U.S. 681, 707-08 (1997) (finding stay constituted an abuse of discretion despite the "high respect that is owed to the office of the Chief Executive").

Here, there can be no question but that this stay is uniquely beneficial to Monsanto. Indeed, the proponents of the settlement do not even try to articulate a settlement benefit for putative class members. To the contrary, for injured Roundup victims with NHL, the stay will likely be detrimental to their claims in both patent and latent ways.

First, during the stay and its aftermath, many Roundup victims will die before having a chance to obtain justice at trial. NHL is often a terminal cancer, with about 20% of victims dying *within the first year*, and about 30-40% not surviving five years.[22] As even the settlement proponents concede, an "NHL" victim's "life and death" can be measured in "a matter of months versus years." Preliminary Approval Motion, Dkt. 12531, p. 57 of 83. Thus, many class members

[22] Cancer Research UK, *Non-Hodgkin Lymphoma Survival*, *available at* https://www.cancerresearchuk.org/about-cancer/non-hodgkin-lymphoma/survival; *See also* Cancer.Net, *Lymphoma- Non-Hodgkin: Statistics* (Jan. 2020) *available at* https://www.cancer.net/cancer-types/lymphoma-non-hodgkin/statistics

diagnosed with NHL will likely die during the pendency of the stay. Beyond the heartache and lack of justice inherent for class members who get NHL, this result would run afoul of the protections provided to the elderly and victims in extremis by many state courts, leaving them unable to get closure during their life.[23] For example, California provides both dying and elderly (over 70) parties a statutory trial-calendar *preference* of 120 days [Cal. Code Civ. Proc. § 36, subds. (a), (d), (f)] in order to take account of their circumstance.[24] Pursuant to the proposed settlement, they would have to wait until the end of the stay before they can even initiate their request for calendar preference after which their heirs in many states, such as California, will not be entitled to seek the same damages as the cancer victims would have when alive. [*See* Cal. Code Civ. Proc. §377.34 (non-economic damages for pain and suffering die with the victim).] Additionally, this four-year standstill without an attorney[25] may create proof problems for those who do not opt out in the initial 150-day period and need to assemble all the information necessary to support exposure. *See Blue Cross and Blue Shield of Alabama v. Unity Outpatient Surgery Ctr., Inc.*, 490 F.3d 718, 724 (9th Cir. 2007) (reversing stay and explaining that "[d]elay 'inherently increases the risk that witnesses' memories will fade and evidence will become stale").

Finally, this delay may well get worse. Although initially set at four years, the litigation stay can be *extended*. *See* Preliminary Approval Motion, Dkt. 12531, p. 29 of 83. The proposed settlement expressly contemplates a "Potential Extension" that would be "negotiated" once again

[23] There are roughly 20,000 deaths a year in the country from NHL. *See id.*
[24] Monsanto knows that Johnson obtained a preferential trial setting in California, because he was in dire circumstances. *See* Motion by Plaintiff Dewayne Johnson for Trial Preference, *Johnson v. Monsanto Co.*, No. CGC-16-550128 (Aug. 29, 2017), *available at* https://usrtk.org/wp-content/uploads/2016/09/trial-preference-aug-2017.pdf.
[25] As discussed above, no outside attorney is likely to represent a claimant when fees are limited to 7.5% and no attorney provided by the settlement is permitted to represent opt-outs.

by "Monsanto" and settlement proponents. *Id.* And the settlement proponents concede that such an extension might include "extend[ing] the litigation stay." *Id.* Now, people diagnosed with NHL soon after any settlement approval would face not an expedited trial setting but some unknown number of years *beyond* the guaranteed four-year stay just to file suit.

Despite all of this, the settlement proponents insist that the litigation stay poses "no prejudice to class members." *Id.* at 80 of 83. After all, the proponents' state, "despite years of public controversy about Roundup," the affected "class members" have to date "not filed lawsuits or even retained counsel." *Id.* Of course, no one in Subclass 2 has. None of them legally would or could – by definition they have not been diagnosed with cancer yet and, as discussed above, do not have a cognizable claim to make at this time.

Undaunted, the proponents try to justify the settlement's built-in delays by invoking "COVID," which (they assure the Court) will already delay trials beyond "the four-year window." *Id.* at 5. Beyond being callous, this argument makes no sense. The proponents present no evidence that, despite the ongoing vaccinations, the COVID-19 delays will last another four years. But no matter how long any such delays last for, the settlement's proposed delay will just add four more years to the back end, with any Roundup litigation commenced in four years already stacked up behind existing dockets. Contrary to the proponents' claims, the proposed stay will greatly "prejudice" class members.

Of course, the party that has much to gain from any stay is Monsanto. While litigation is stayed, Monsanto will continue to sell Roundup, making billions of dollars in profit. For example, in 2016, Monsanto reportedly made $1.9 billion in profit from Roundup sales (plus

another $6 billion in profit from selling its Roundup-related genomic seeds).[26] At that rate, while funding the settlement at "up to" $2 billion, during the litigation stay, Monsanto would make about that much each year from Roundup alone. In addition, while Monsanto would like to pay little or nothing in tort claims for the next four years, it would accumulate countless tens or hundreds of millions in interest on that money not being paid to Roundup victims.

IV. RIGHTS LOST BY ALL CLASS MEMBERS

A. The Broad Stay Only Benefits Monsanto.

Addressed above are the benefits Monsanto receives from a stay on NHL litigation, but this is not all that is stayed. The settlement class includes false advertising claims, though there is no compensation offered for such claims. *See* Settlement Agreement, § 1.1(a), Dkt. 12531-2, pp. 6-7 of 266. And apparently this was not enough for Monsanto. Section 2.1(70) buries the breadth of what "Roundup Claims" are as it broadly defines them not only to include the anticipated personal injury tort claims but also:

> other tort claims (including claims for fraud, misrepresentation, fraudulent concealment, negligent misrepresentation, and failure to warn), warranty claims, false advertising claims, and claims for violations of any consumer protection or unfair and deceptive acts or practices statute.

Id. § 2.1(70), p. 15 of 266. How much would other manufacturers be willing to pay for such a respite from their consumers and other customers?

B. Settlement Proponents' Papers are Inaccurate in Describing Class Member's Ability to Return to the Court System as All Class Members Expressly Release All Unknown Future Claims.

Class Proponents insist that:

[26] Maxx Chatsko, *How Much Money Does Monsanto Make From Roundup?* The Motley Fool (May 26, 2016) *available at* https://www.fool.com/investing/2016/05/26/how-much-money-does-monsanto-make-from-roundup.aspx. Since Bayer's acquisition of Monsanto, Bayer has filed a consolidated financial report. This makes it difficult to estimate Monsanto's true financial current picture.

> The Settlement preserves class members' right to bring almost any claim, class or individual, for compensatory damages or equitable relief after the litigation stay period, including but not limited to claims for personal injury, fraud, misrepresentation, negligence, fraudulent concealment, negligent misrepresentation, breach of warranty, false advertising, and violation of any unfair and deceptive acts or practices statute.

PreliminaryApproval Motion, Dkt. 12531, p. 55 of 83. However, this is entirely inconsistent with the actual text of the Settlement Agreement. The class-wide release language is found in Article XVII. Section 17.2 explicitly releases all "unknown claims" on behalf of all Settlement Class Members.[27] Dkt. 12531-2, pp. 98-99 of 266. This complete release of unknown claims is forcefully reiterated in "Section 17.3 Scope of Releases."[28]

---

[27] Section 17.2 Release of Unknown Claims. In connection with the releases in Section 17.1, the Class Representatives and Subclass Representatives, all Settlement Class Members (on behalf of themselves and the associated Settlement Class Member Parties), and the Settlement Class acknowledge that they are aware that they may hereafter discover Claims now unknown or unsuspected, or facts in addition to or different from those which they now know or believe to be true, with respect to actions or matters released herein, whether such Claims or facts now exist, hereafter may exist, or might have existed. Class Representatives and Subclass Representatives, all Settlement Class Members, and the Settlement Class explicitly took unknown or unsuspected Claims into account in entering into the Settlement Agreement and it is the intention of the Parties fully, finally and forever to settle and release all Claims as provided in Section 17.1 with respect to all such matters.

[28] Section 17.3 Scope of Releases.

(a) The Class Representatives and Subclass Representatives (on behalf of themselves, the Settlement Class Members, and the associated Settlement Class Member Parties) acknowledge that they have been informed of Section 1542 of the Civil Code of the State of California (and similar statutes) by counsel and that they do hereby expressly waive and relinquish all rights and benefits, if any, which they have or may have under said section (and similar statutes) which reads as follows:

A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS THAT THE CREDITOR OR RELEASING PARTY DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE AND THAT, IF KNOWN BY HIM OR HER, WOULD HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR OR RELEASED PARTY.

(b) The Parties acknowledge that the foregoing waiver of the provisions of Section 1542 of the California Civil Code and all similar provisions of the statutory or common law of any other state, territory, or other jurisdiction was separately bargained for and that the Parties would not have entered into the Settlement Agreement unless it included a broad release of unknown

A complete release of "unknown claims" on behalf of an entire class is anything but an unexpurgated right to proceed with litigation after the stay. Moreover, notice is not given for this loss of "unknown" rights. However, settlement proponents' motion never attempts to explain why such a release would be provided on behalf of the entire class.

One can only speculate that Monsanto wanted this provision, because it is acutely aware that the discovery rule in most states tolls the statute of limitations, allowing individuals to sue long after actual exposure when they reasonably discover the existence of an injury causally related to Roundup. This permits actions for diseases which might later be determined to be related to glyphosate until after diagnosis or their relationship to glyphosate is apparent.

It would make sense that the purpose of such release language is to insulate Monsanto from suits related to any subsequently discovered causal nexus between glyphosate and either latent injury or later discovered injuries, as Monsanto is acutely aware of the development of the science and medicine regarding one of its former herbicides, 2,4,5-T.

Monsanto began to manufacture the herbicide 2,4,5-T in the late 1940s. It was later used very heavily in Vietnam as it constituted 50% of what was called Agent Orange. In the early 1990s Congress signed a bill tasking the National Academy of Science's Institute of Medicine to study the effects of Agent Orange on Vietnam veterans in order to determine whether they should be compensated for exposure. More than forty years after 2,4,5-T was first sold, in 1994 veterans were compensated for NHL, chloracne, Hodgkin's disease, porphyria cutanea tarda,

---

Claims arising from, resulting from, in any way relating to or in connection with the matters released herein.
(c) The Settlement Class Member Parties intend to be legally bound by the Releases.
(d) The Releases are not intended to prevent the Defendant or any Monsanto Parties from exercising its rights of contribution, subrogation, or indemnity under any law.

respiratory cancers, and soft tissue sarcomas. The results of newer studies broadened the number of diseases requiring compensation to include prostate cancer in 1996, multiple myeloma in 1998, diabetes mellitus Type-2 in 2000, AL amyloidosis in 2007, ischemic heart disease and Parkinson's disease in 2008, and peripheral neuropathy in 2010. *See* the Declaration of Gerson H. Smoger, attached hereto as Exhibit "A" hereto.

Even for pharmaceuticals, which require official reporting of adverse incidents, there are countless examples where pharmaceuticals were required to be withdrawn based on adverse medical information discovered 10 or more years later,[29] 15 or more years later,[30] 20 or more years later,[31] or even 25 or more years later.[32] As latency progresses and the epidemiology of

[29] The following drugs remained on the market 10-14 years before they were withdrawn due to health concerns: Ergamisol (Levamisole) treatment for worms, arthritis and cancers 1989, withdrawn 2000 due to neutropenia, agranulocytosis, and thrombotic vasculopathy; Meridia (Sibutramine) appetite suppressant first sold 1997, withdrawn 2010 due to increased heart disease and stroke risk; Seldane (Terfenadine) antihistamine first sold 1985, withdrawn 1998 due to fatal heart problems; Trasylol (Aprotinin) heart bypass bleeding reduction first sold for use in 1993, withdrawn 2007 due to kidney damage and death; Efocaine (Butamben) local anesthetic first sold in 1952, withdrawn 1964 due to paraplegia; Tigason (Etretinate) for psoriasis first sold in 1985, withdrawn 1998 due to high risk of birth defects.

[30] The following drugs remained on the market 15-19 years before they were withdrawn due to health concerns: Permax (Pergolide mesylate) for Parkinson's symptoms first sold in 1988, withdrawn 2007 due to heart valvulopathy; Pacatal (Mepazine) for anesthesia first sold 1955, withdrawn 1970 due to seizures and intestinal paralysis; Laverna (Oxyphenisatin) laxative first sold in 1955, withdrawn 1973 due to liver failure; and Fenormin (Phenformin hydrochloride) for type-2 diabetes first sold 1959, withdrawn 1977 due to fatal lactic acidosis.

[31] The following drugs remained on the market 20-24 years before they were withdrawn due to health concerns: Pondimin (Fenfluramine) appetite suppressant first sold in 1973, withdrawn 1997 due to PPH and cardiac valvulopathy; and Reserpoid and Rau-Sed (Reserpine) for hypertension first sold 1954, withdrawn 1977 due to irregular heartbeat, hearing loss, and vision problems; Survector (Amineptine) Anti-depressant first sold 1978, withdrawn 1999 due to hepatotoxicity.

[32] The following drugs remained on the market more than 25 years before they were withdrawn due to health concerns: Accutane (Isotretinoin) acne medication first sold 1982, withdrawn 2009 due to birth defects, miscarriage, and premature deaths among pregnant women who used it, as well as suicidal ideation and inflammatory bowel disease; Zantac (Ranitidine), treatment for stomach problems first sold 1983, withdrawn 2020 due to carcinogenicity; Asterol (Diamthazole dihydrochloride) antifungal agent first sold in 1951, withdrawn 1977 due to

glyphosates matures, it is unknown now how many diseases may in the future be related to glyphosate, particularly given its genotoxicity.

C. Class Members Lose the Benefit of True Medical Monitoring.

The settlement argues that it provides for medical monitoring but that is not what the Diagnostic Accessibility Grant Program ("DAGP"), discussed further below, does. The reason that it is not true medical monitoring is that it is only looking for one already known endpoint, NHL. This is the antithesis of true medical monitoring which should appropriately be designed to broadly look at health outcomes in a toxin-exposed population, not to look at that population with blinders on. For example, the medical monitoring conducted in West Virginia of 70,000 of the 80,000 people in the community exposed to Dupont's C8 concluded that there was a probable link between C8 and six conditions: testicular cancer; kidney cancer; thyroid disease; ulcerative colitis; hypertension; and high cholesterol. These conditions had not been clearly associated with C8 before the class action medical monitoring took place.[33] While not initiated by a class action lawsuit, the medical monitoring of Air Force veterans exposed to Agent Orange showed glucose abnormalities and an increase of diabetes, which were not suspected at the time the project was initiated.[34]

---

neurotoxicity; Stilphostrol (Diethylstilbestrol) multiple uses, most vaginally related first sold in 1941, tablet form withdrawn in 1975 and gradually limited due to birth defects and vaginal adenocarcinoma in daughters; Cylert (Pemoline) ADHD and narcolepsy treatment first sold 1975, withdrawn 2005 due to liver failure; and Tresamide (Sulfathiazole) antimicrobial first sold 1939, withdrawn 1970 due to kidney and liver damage and death.

[33] Taylor Sisk, *A Lasting Legacy: DuPont, C8 Contamination and the Community of Parkersburg Left to Grapple With the Consequences*, Environment Health News (Jan. 7, 2020), *available at* https://www.ehn.org/dupont-c8-parkersburg-2644262065.html.

[34] GL Henriksen *et al.*, *Serum Dioxin and Diabetes Mellitus in Veterans of Operation Ranch Hand*, Epidemiology 8(3): 252 (May 1997), *available at* https://pubmed.ncbi.nlm.nih.gov/9115019/.

These types of findings from medical monitoring are the most likely reason Monsanto required that all settlement members waive medical monitoring on a class-wide basis. Medical monitoring can be one of the best ways to discover the causal connection to diseases not originally fully appreciated, such as those discussed above in Section IV.B. Properly conducted, the monitoring of exposed populations can discern patterns of disease causation that requires further research along with methods for early intervention. Medical monitoring programs can provide essential information-gathering tools, which can be an important avenue by which the health care community learns of safety and efficacy information.[35] However, from Monsanto's perspective, medical monitoring can create future liability, as it did with Dupont subsequent to the C8 medical monitoring.

D. The Settlement Includes Known Potential Claimants Without Offering Them Compensation.

1. Claims for Those Diagnosed with NHL before 1/1/15 Should Not be Included.

Roundup claims for NHL class members who first received a Qualifying Diagnosis prior to January 1, 2015, are presumed by the settlement to have their claims denied unless they are able to go through the difficult effort of proving that these claims would not have been barred by an applicable statute of limitations or repose. *See* Settlement Agreement, § 6.1(a)(iv), Dkt. 12531-2, pp. 23-24 or 266. However, even if they are able to traverse what can often be a legal minefield for attorneys with experience in these matters, a successful result relegates a claimant to placement in Tier 1 and a *de minimus* recovery of no more than $10,000. *Id.* at Exhibit 5: Compensation Award Guidelines, Dkt. 12531-2, p. 187 of 266.

[35] See, e.g., Catherine T. Struve, *The FDA and the Tort System: Postmarketing Surveillance, Compensation and the Role of Litigation*, 5 Yale J. Health Policy & Ethics 587, 591 (2005).

Given this, why are these individuals forced to be class members in the first place? The vast majority of jurisdictions have instituted a "discovery rule" pursuant to which the limitations period does not begin to run until a person knows or should have known of his or her injury.[36] *See, e.g., Urie v. Thompson,* 337 U.S. 163 (1949). Claimants should be free to litigate this. It is not fair to strip victims of cancer of the right to legal redress and a jury trial for failing to opt out when they are still forced to navigate all of the hurdles that they would have had to navigate in litigation with a far greater monetary upside. It seems, therefore, that the only reason these individuals were included in the settlement was to saddle more victims with the four-year stay and loss of the ability to seek punitive damages.

Finally, as worded, it appears that this limitation even includes individuals who were first diagnosed before January 1, 2015, but later relapsed. Despite their clearly declining condition, these individuals would at best be eligible for no more than a $10,000 award from the settlement grid. What is fair about that?

2. Derivative Claimants Should Not Be Included.

The settlement defines “Derivative Claimants” to mean “spouses, parents, children who are dependents, or any other Persons who have or assert a right to maintain a Roundup Claim against the Monsanto Parties or the Related Parties by reason of their relationship with a Settlement Class Member, including a deceased Settlement Class Member.” Settlement Agreement, § 2.1(24), Dkt. 12531-2, p. 10 of 266. It makes clear that any Derivative Claimants are not eligible for Compensation Awards. *Id.*, § 6.1(c), p. 28 of 266.

[36] Katelyn Ashton, *50-State Survey of Statutes of Limitations and Repose in Prescription Product Liability Cases*, Butler Snow (Nov. 16, 2020) *available at* https://www.jdsupra.com/legalnews/50-state-survey-of-statutes-of-20476/

Here these claims are included in the settlement without any availability of compensation and the impossibility of meaningful notice. Derivative claims by spouses or children of those suffering from cancer are released, although such claims can be quite substantial. Yet, here those spouses and children have neither the right to opt out nor receive compensation. Indeed, spouses may not have married yet; children may be unborn. Without a present relationship with a class member, they cannot even influence the person who does have the power to opt out now and determine the future of their claims. As a result, they are just another group of potential claimants engulfed by the settlement, along with its stay, punitive damages waiver, and insidious science panel.

3. Those Suffering from Multiple Myeloma Should Not be Included.

Defendant Monsanto knows that Roundup-exposed individuals who suffer from the cancer multiple myeloma have also brought actions against the company. As Bayer states in its own annual report: "Plaintiffs allege personal injuries resulting from exposure to those products, including non-Hodgkin lymphoma (NHL) *and multiple myeloma*, and seek compensatory and punitive damages."[37] (Emphasis supplied.) Yet notably Section 2.1(52) states: "'NHL' … does not include multiple myeloma." Settlement Agreement, § 2.1(52), Dkt. 12531-2, p. 13 of 266.

If those who develop multiple myeloma cannot be compensated, why are they included in the class at all? Why should they be forced to endure the litigation stay and the loss of the ability to seek punitive damages when the settlement offers them nothing? Certainly, Monsanto realizes there is some relationship, as one of the factors relegating NHL settlement class members to Grid

[37] Bayer Annual Report 2020 (Feb. 25, 2021) at 112, *available at https://www.bayer.com/sites/default/files/2021-02/Bayer-Annual-Report-2020.pdf*

Tier 2 is whether a First Degree Relative has been diagnosed with NHL or myeloma. *See* Settlement Agreement, Exhibit 5: Compensation Award Guidelines, Dkt. 12531-2, p. 185 of 266.

E. The Punitive Damages Waiver Does Not Comport With Constitutional Guidance Nor Is It a Fair Compromise Beneficial to the Class.

Under the proposed settlement, all class members must "release" their claims for "punitive" damages against Monsanto, including both known and shockingly "*unknown*" claims. *See* Settlement Agreement, § 17.1(a), Dkt. 12531-2, p. 97 of 266. The basis for doing so is unconstitutional. The fact of doing so is not fair to the individuals enveloped within the broad class definition.

Punitive damages should "properly be imposed to further a State's legitimate interests in punishing unlawful conduct and deterring its repetition." *Philip Morris USA v. Williams,* 549 U.S. 346, 352 (2007); *BMW of N. Am., Inc. v. Gore*, 517 U.S. 559, 568 (1996). To date, multiple juries have awarded punitive damages, finding that Monsanto's malicious misconduct regarding Roundup warranted such punishment and deterrence. See the Declaration of Gerson H. Smoger, attached as Exhibit "A," enclosing a very small part of the evidence regarding defendant Monsanto's outrageous conduct. *See also* Pretrial Order No. 214, Dkt. 11182, p. 3 of 4 (citing jury "verdicts" with "punitive damages"); Preliminary Approval Motion, Dkt. 12531, p. 60 n.13 of 83 (acknowledging awards in *Hardeman, Johnson,* and *Pilliod*). Moreover, the first appellate court to review one of these verdicts (*Johnson* in California) affirmed the jury's punitive-damages award as supported by "substantial evidence that Monsanto acted with a willful and conscious disregard of others' safety," including "corporate malice" in continuing to market Roundup despite the known "possible link with NHL." *Johnson v. Monsanto Co.* (2020) 52 Cal. App. 5th 434, 458, 460, 266 Cal. Rptr. 3d 111, 132, 134; *see* Cal. Civ. Code § 3294 (California punitive damages statute); *Boeken v. Philip Morris, Inc.* (2007) 127 Cal. App. 4th 1640, 1689, 26

Cal. Rptr. 3d 638, 675 ("purpose of punitive damages [in California] is to punish wrongdoers and thereby deter the commission of wrongful acts").

This reality rebuts Monsanto's theoretical argument that recovering punitive damages is "rare and arduous." *See* Preliminary Approval Motion, Dkt. 12531, p. 60 of 83. Moreover, if punitive damage awards were so rare, Monsanto would not be so intent on having them released. *See* Pretrial Order No. 214, Dkt. 11182, p. 3 of 4.

The settlement proponents also assert that Monsanto has somehow *already been* punished and deterred enough by the "amounts" of compensatory damages paid in settling existing cases and to be paid under this settlement. *See* Preliminary Approval Motion, Dkt. 12531, pp. at 16, 60 of 83 (contending that the "magnitude" of payouts "has already served the societal interest in deterrence and punishment"). Monsanto's payment of compensatory damages cannot be considered to be punishment for any misconduct proven to have been malicious or oppressive. These are distinct measures of damages for a reason. No principled reason exists to consider the payment of compensatory settlements to cancer victims as justification for barring warranted punishment for causing that cancer with malicious conduct. Indeed, the Release required of every NHL victim who accepts settlement funds states clearly that the settlement payments are for only "damages on account of personal injuries" and do *not* "represent[] punitive or exemplary damages." Settlement Agreement, Exhibit 6: Form of Release, item 25, Dkt 12531-2, pp. 200-201 of 266. Given Monsanto's consistent "no admission of wrongdoing" posture, it can safely be presumed that every release of an individual claim to date has contained similar language.

Secondly, settlement proponents are wrong when they assert that Monsanto should not pay further punitive damages because no individual "class member" has a personal "entitlement" to punitive damages in that they are intended only to benefit "society as a whole." Preliminary

Approval Motion, Dkt. 12531, p. 59 of 83. The incorrectness of this statement is made apparent by the three punitive damage verdicts that juries have already rendered. Any amount that might be paid by Monsanto from these three punitive awards necessarily has *not* punished Monsanto for anything but its conduct harming those individual plaintiffs. *See Williams*, 549 U.S. at 353 (due process "forbids a State to use a punitive damages award to punish a defendant for injury that it inflicts upon nonparties"). Nor would any individual punitive damage award do so if not precluded by this settlement. The individual nature of these awards is precisely why each of the three jury verdicts was *reduced* to assure that the punitive damages satisfied due-process concerns (Preliminary Approval Motion, Dkt. 12531, p. 60 n.13 of 83; *e.g.*, *Johnson*, 52 Cal.App.5th at 461-62), and to date only one (*Johnson*) has actually been paid. *See Simon II Litig. v. Philip Morris USA Inc.*, 407 F.3d 125, 139 (2d Cir. 2005) (rejecting even a lump-sum punitive damages award because the "conduct relevant to the reprehensibility analysis must have a nexus to the specific harm suffered by the plaintiff, and ... it [can]not be independent of or dissimilar to the conduct that harms the plaintiff.").[38]

Moreover, in waiving all rights to punitive damages against Monsanto on behalf of the class, the settlement proponents make no effort to account for the value of the claim which the class is giving up. *See Simon II*, 407 F.3d at 127-28, where the Second Circuit held "that [Judge Jack Weinstein's] order certifying this punitive damages class must be vacated because there is no evidence by which the district court could ascertain the limits of either the fund or the

[38] Here, the settlement, even worse than *Simon II*, proposes no payment for punitive damages "prior to an actual determination and award of compensatory damages." *Simon II Litig.*, 407 F.3d at 138. No effort is even made to calculate what is being lost. This proposal thus raises even more concerns than the proposition rejected in *Simon II*.

aggregate value of punitive claims against it, such that the postulated fund could be deemed inadequate to pay all legitimate claims, and thus plaintiffs have failed to satisfy one of the presumptively necessary conditions for limited fund treatment under *Ortiz v. Fibreboard Corp.*, 527 U.S. 815, 119 S. Ct. 2295, 144 L. Ed. 2d 715 (1999)."

Finally, nothing indicates that exposure to compensatory liability has now "deterred" Monsanto from continuing the misconduct creating that liability. To the contrary, despite prior verdicts adjudging Roundup as the cause of victims' cancers, Monsanto has continued unabated in manufacturing and selling Roundup with glyphosate. The settlement reflects Monsanto's continued denial of *any* "liability or wrongdoing" at all (Sections 26.1, 26.2), which Bayer just recently reiterated in its annual report. ("Bayer believes it has meritorious defenses and intends to defend the safety of glyphosate and our glyphosate-based formulations vigorously."[39]) And now, Monsanto pushes this settlement to allow it to keep selling Roundup long into the future while being protected even from "unknown" conduct worthy of punishment and from the future exposure of its present victims. Far from being deterred, Monsanto offers this "settlement" as a path to *continue* its malicious conduct.

V. THE SETTLEMENT MISSTATES ANY BROAD BENEFITS IT ALLEGEDLY PROVIDES

A. Any Benefits From the DAGP are Illusory.

In forming the DAGP, there is an implicit assumption that there is a need for heightened outreach to affected populations. Although settlement proponents offers no evidence to support this central conclusion, the ultimate question is whether extending such outreach will enhance survival. Unfortunately, there is no evidence that it will. As stated by the American Cancer

[39] Bayer Annual Report 2020 (Feb. 25, 2021) at 113, *available at* https://www.bayer.com/sites/default/files/2021-02/Bayer-Annual-Report-2020.pdf

Society: "At this time, there are no widely recommended screening tests for non-Hodgkin lymphoma (NHL). This is because no screening test has been shown to lower the risk of dying from this cancer."[40]

The existing methods currently in place for diagnosing NHL are all invasive and would not be conducted by a screening process, such as the DAGP. One way to diagnose NHL is by tumor biopsy, which requires surgery to examine a mass in order to get confirmation of the disease by a pathologist. A second mechanism would be to conduct rather expensive diagnostic electronic tests, such as CT, CAT, or PET scans or MRIs. Yet, these are not only individually expensive, they involve doses of radiation or the administration of radioactive isotopes that themselves may increase cancer risk. A final diagnostic technique is by bone marrow aspiration, which is a highly invasive and painful procedure.[41] Clearly, no medical authority would encourage these types of tests on a preventative basis. But at present, these are the tests necessary to diagnosis NHL.

B. The "Labeling Addition" Cannot be Considered a Settlement Benefit.

Article IX of the settlement agreement attempts to tout a proposed "Labeling Addition" as a true benefit to the class as a whole. Dkt. 12531-2, p. 58 of 266. However, to the extent that the proposed settlement agreement alleges that it requires Monsanto to seek permission from the EPA to include "links" to "scientific evidence" on its labels, the value is *de minimis* compared to what the proposed class is relinquishing. It can hardly be considered an arms-length negotiation when the touted "Labeling Addition" here does not require Monsanto to include any real warning

[40] The American Cancer Society, *Can Non-Hodgkin Lymphoma Be Found Early?* (Aug. 1, 2018), *available at* https://www.cancer.org/cancer/non-hodgkin-lymphoma/detection-diagnosis-staging/detection.html.

[41] Cancer.Net, *Lymphoma- Non-Hodgkin: Diagnosis* (Jan. 2020), *available at* https://www.cancer.net/cancer-types/lymphoma-non-hodgkin/diagnosis.

at all on its refashioned label. Instead, the labeling provision simply and only possibly provides for unknown "links" to unspecified scientific evidence which in any case no putative class member is likely to look up or even understand if they do. The proposed agreement does not even require Defendant to provide settlement proponents with a copy of its proposal before submission to the EPA; nor does it mandate the use of the most obvious word – CANCER.

In actuality, the "Labeling Addition" set forth in the proposed settlement agreement is pretty much a "worthless" exercise. *Koby v. ARS Nat'l Servs., Inc.*, 846 F.3d 1071, 1079 (9th Cir. 2017) (explaining that injunctive relief was worthless in reversing approval of settlement under Rule 23(e)). Article IX essentially states that the Defendant will provide for labeling as approved by the EPA. Defendant could do this and even might still have to do this without the settlement agreement. *See* 7 U.S.C. § 136j(a)(1)(E). Surely, nothing in the settlement proponents' submission explains why the proposal for a labeling addition cannot be sent to the EPA by Monsanto absent this settlement agreement given that changed labels would be just one part of the commitment to "transparency" that Bayer trumpets in its recent annual report.[42] In any case, under these circumstances the "Labeling Addition" has "no real value" for purposes of a Rule 23(e) evaluation. *See Guoliang Ma v. Harmless Harvest, Inc.*, No. 16-CV-07102, 2018 WL 1702740, at *7 (E.D.N.Y. March 31, 2018) (rejecting proposed settlement agreement under Rule 23(e) and explaining that labeling provision of agreement was worthless).

Far from value, the addition will likely be used to further Monsanto's defenses. The settlement agreement explicitly allows Monsanto to continue to argue its preemption defense. *See* Settlement Agreement, § 12.7(i), Dkt. 12531-2, p. 73 of 266. No doubt an argument will be

[42] Bayer Annual Report 2020 (Feb. 25, 2021) at 64, *available at* https://www.bayer.com/sites/default/files/2021-02/Bayer-Annual-Report-2020.pdf

made to state courts around the country that, based upon this Court's *imprimatur* of a labeling requirement, actions should be preempted.

C. The One-Way Ability to Use the Science Panel's Findings Provides No Benefits to the Class.

As if this brief has not delineated enough one-sided provisions, the ways that the science panel's conclusions may be used outside of the framework of NHL tort litigation stretches any possible bounds. The settlement at Section 12.3(f) actually states:

> The **agreement and stipulation** regarding evidentiary use of the Science Panel Determination **shall not apply** in any legal, legislative, administrative, or regulatory action, proceeding, or matter between an Opt Out and any Monsanto Party or Related Party**, but nothing in the Settlement Agreement precludes a Monsanto Party or Related Party from seeking to introduce or otherwise use the Science Panel Determination in such a lawsuit or other proceeding or matter in any way**. (emphasis supplied)

Settlement Agreement, § 12.3(f), Dkt. 12531-2, p. 67 of 266. Nothing more needs to be said other than what possible benefit could this provision provide to the class when the results of the science panel can only be used by Monsanto outside of tort litigation? On the other hand, the benefit to Monsanto is obvious.

VI. THE COMPARATOR SETTLEMENTS THAT THIS COURT IS POINTED TO ARE NOTHING LIKE THE SETTLEMENT PROPOSED HERE

A. "In re Diet Drugs."

The Motion for Preliminary Approval emphasizes that the class settlement is modeled off of the *In re Diet Drugs* settlement. *See, e.g.*, Preliminary Approval Motion, Dkt. 12531, pp. 13 n.1, 18 of 83. It does not emphasize that at the time of the settlement the implicated drug had long been off the market and was not continuing to be sold. It does not emphasize that any label changes would be unnecessary for a withdrawn drug. It does not emphasize that a science panel was not created, even though dose is far easier to calculate for a prescription pharmaceutical. It does not emphasize that the compensation scheme within the settlement was substantially more

for the suspect heart valve disease than the compensation here for a much deadlier cancer. In fact, the only similarity between these cases is the release of punitive damages for those who exercised their back end opt-out. However, even settlement proponents admit that unlike the release of medical monitoring here, in *Diet Drugs* the punitive-damages release was deemed fair in part because it left intact a "medical monitoring program." *Id.* at p. 60 of 83 (*citing In re Diet Drugs Prods. Liab. Litig.*, Nos. 1203, 99–20593, 2000 WL 1222042 at *49 n.22 (Aug. 22, 2000)).

Moreover, far from being a positive example of the trial efficacy of limiting all damages to a compensatory component, the *Diet Drugs* case illustrates the myriad problems caused by eliminating such damages in state court cases. In *Diet Drugs*, the plaintiffs who tried to exercise a "downstream" opt-out, exiting to the tort system, found themselves enjoined by the federal court from: 1) offering into evidence in the state court trials a long list of extremely relevant evidentiary exhibits and depositions; 2) making any statement or argument to the court or to the jury related directly or indirectly to the forbidden evidence; or 3) introducing any evidence or making any statement before or argument to the court or jury related directly or indirectly to malicious, wanton "or other similar conduct of Wyeth, however described." *In re Diet Drugs (Phentermine/Fenfluramine/Dexfenfluramine) Prod. Liab. Litig.*, 369 F.3d 293, 302-03 (3d Cir.) (quoting PTO 2625), *cert. denied*, 543 U.S. 960 (2004); *see also id*. at 300-01 (quoting PTO 2625, PTO 2680). Two plaintiffs, Clara Clark and Linda Smart, found their trial counsel slapped with injunctions, and their state court trials could not be held until after the plaintiffs' counsel successfully appealed to the Third Circuit.

Far from being a model of judicial efficiency, *Diet Drugs* illustrates that federal limits imposed on state court trials create a practical quagmire for the plaintiffs and a gift to defendants

with opportunities to delay trial settings and box plaintiffs into Hobson's choices (*e.g.*, whether to risk a trial delay to appear in federal court and fight off injunction threats). While the MDL court's injunctions were reversed "[i]nsofar as the injunctions barred the use of evidence that was relevant to genuine issues in the state trial–apart from punitive, multiple, or exemplary damages," 369 F.3d at 315, the injunctions made "it very difficult for plaintiff to try the case." *Id.*

B. "In re National Football League Players Concussion Injury Litigation."

As this court made clear in Pretrial Order No. 214, the class of everyone exposed to Roundup in the United States is in no way comparable to the known and identifiable class of retired, professional NFL football players whose head injury claims were settled in *In re National Football League Players Concussion Injury Litigation*, 821 F.3d 410 (3d Cir. 2016) ("*NFL Concussion*"). Pretrial Order No. 214, Dkt. 11182, p. 3 of 4. Nevertheless, settlement proponents still cite to this case nine times in their motion.

More specifically, unlike the diffuse population of the Roundup class, the estimated population of retired players in *NFL Concussion* was 21,070, and over 5,000 filed suit in the MDL proceedings. 821 F.3d at 425, 433, 438. The estimate of class members who received notice of the settlement through direct mail and secondary publication was 90%—and that notice was in addition to the extensive national media coverage of the case. *Id*. at 438. The Third Circuit reasoned that, "[b]y the time of the settlement, many of the retired players in this class already had counsel and had sued the NFL, suggesting that their claims were valuable enough to pursue in court and that the players were informed enough to evaluate the settlement." *Id.* (note omitted).

In *NFL Concussion*, the monetary award that class counsel secured for the retired athletes was uncapped and inflation adjusted. *Id*. at 432. The Third Circuit was able to conclude that

future claimants were in fact thus adequately represented in the negotiations. *Id.* at 433. Class counsel had "a comprehensive database of the claims and symptoms of retired players." *Id*. at 436. Of the 5,000 who filed suit, an estimated 3,900 had no current qualifying diagnosis of head injury. *Id*. at 433. Because so many retired players "with no currently compensable injuries have already taken significant steps to protect their rights and interests," the class was not defeated by *Amchem*'s strict analysis of adequacy of representation and the Supreme Court's concern that the risk apparent to a "futures" asbestos class would be too nebulous for their rights and interests in the settlement to be protected. *Id*. Thus, *Amchem*'s inadequacy of representation holding was distinguishable in *NFL Concussion*, because approximately a quarter of the entire class filed suit. The class participation in *NFL Concussion* is certainly not in any way comparable to the situation here.

The *NFL* settlement also is distinguishable because the terms of individual settlements were substantial, unlike the minimal payments to cancer victims here. The *NFL* settlement compensated retired players who had one of six qualifying diagnoses in amounts ranging from $1.5 million to $5 million per class member. *Id*. at 423-24. The settlement is not only uncapped and inflation-adjusted, but it also will remain in place for 65 years, and does not require that the player show that his time in the NFL caused the onset of the qualifying diagnosis. *Id.* at 425, 433. The Third Circuit thus agreed that the settlement represented a fair deal.

C. "In re Deepwater Horizon."

The settlement of the BP oil spill resolved claims arising from a single past event with class members limited to cleanup workers and coastline residents within a specific geographical area that had already developed a "Specified Physical Condition." *See* BP Medical Settlement Agreement, *Deepwater Horizon*, Rec. Doc. 6273-1 (April 18, 2012) at ¶¶ I(A); *In re Oil Spill by*

the Oil Rig "Deepwater Horizon in the Gulf of Mexico on April 20, 2010, 295 F.R.D. 112, 133 (2013).

As stated in the Declaration of Stephen J. Herman, Co-Lead Class Counsel, attached as Exhibit "B" at para.26:

> There are important differences between the BP Medical Class Settlement and the Proposed Class Settlement in the above-captioned case, including particularly: a. BP was a "single event" case; b. All of the relevant exposure had already occurred; c. The class members could be specifically identified and provided with individualized notice; d. All of the claims were governed by general maritime law; e. The BP Medical Class Members were entitled to **both** immediate compensation from the settlement program for acute and chronic conditions **and also** the ability to come back and sue BP in the future in the event of a later-manifested physical condition or disease; and f. The potential future claims for punitive damages that were released in the Back-End Litigation Option process were uncertain and legally challenging.

Unlike here, where class members who opt out on the back end must stipulate to the admissibility of a (likely adverse) Science Panel determination on causation, the *Deepwater Horizon* defendants agreed to stipulate to both exposure and BP's fault, limiting the necessary issues for trial for those who chose the Back-End Litigation Opt-Out option. (See the Declaration of Stephen J. Herman at fn. 8) Here, Defendant Monsanto has not conceded anything in exchange for Plaintiffs' concessions.

VII. CONCLUSION

For the foregoing reasons, the Court should deny preliminary approval to the proposed settlement and strike the Declaration of Amit R. Mehta, M.D.

March 4, 2021

/s/ Gerson H. Smoger
Gerson H. Smoger
SMOGER &ASSOCIATES
13250 Branch View Lane
Dallas, TX 75234
(510) 531-4529
(510) 531-4377 (facsimile)
gerson@texasinjurylaw.com

Steven M. Bronson, Esq. (SBN 246751)
THE BRONSON FIRM APC
7777 Fay Avenue, Suite 202
La Jolla, CA 92037
Telephone: 619-374-4130
Facsimile: 619-568-3365
sbronson@thebronsonfirm.com

Counsel for Objector Melinda Sloviter

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of March 2021, a copy of the foregoing Objection was filed with the Clerk of the Court through the CM/ECF system which sent notice of the filing to all appearing parties of record.

/s/ Gerson H. Smoger
Gerson H. Smoger
SMOGER &ASSOCIATES
13250 Branch View Lane
Dallas, TX 75234
(510) 531-4529
(510) 531-4377 (facsimile)
gerson@texasinjurylaw.com

EXHIBIT A

DECLARATION OF GERSON H. SMOGER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	*	MDL No. 2741
	*	Case No. 3:16-md-02741-VC
This Document Relates to:	*	**DECLARATION OF GERSON H. SMOGER, J.D., Ph.D. IN SUPPORT OF**
Ramirez, et al.	*	
Plaintiff(s),	*	**OPPOSITION TO MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT, APPOINTMENT OF INTERIM CLASS AND SUBCLASS COUNSEL**
v.	*	
Monsanto Co.,	*	Judge Vince Chhabria
Defendant(s).	*	
Case No. 3:19-cv-02224	*	

****

I, Gerson H. Smoger, declare as follows:

1. I am an attorney licensed to practice law in the states of California and Texas, as well as numerous federal courts, including the United States Supreme Court. Before February 3, 2021, I have not represented anyone with respect to Roundup containing glyphosate. No one is paying me

either for preparing this declaration or the brief it is being attached to.

2. For three decades I have served as the Chair or Co-chair of the American Association for Justice's Herbicides and Pesticides Litigation Group. I also currently serve on the boards of Public Citizen and Public Justice, and as the Vice-Chair of the Pound Civil Justice Institute. I serve on the advisory boards of U.C Berkeley's Civil Justice Research Initiative, the Human Rights Center at U.C. Berkeley, and Physicians for Human Rights. I have previously served as the Vice-Chair of the American Bar Association's Toxic Torts, Hazardous Substances and Environmental Law Committee. I received my J.D. from Berkeley Law (formerly Boalt Hall) and my Ph.D. from the University of Pennsylvania.

3. As a trial lawyer, in 2012 I was named by Public Justice as Trial Lawyer of the Year. During my career, one of my specialties has been in trying toxic tort cases. I have both tried to verdict and represented plaintiffs exposed to herbicides.

4. As to the claims of future class members, I successfully argued the case of *Stephenson v. Dow Chem. Co.*, 273 F.3d 249 (2d Cir. 2001) *aff'd in relevant part by evenly divided vote and rev'd in part sub nom. Dow Chem Co. v Stephenson*, 539 U.S. 111 (2003) in both the Second Circuit and the United States Supreme Court. These courts affirmed the right to collaterally attack the 1984 Agent Orange settlement, which had purported to settle the claims of future claimants who had no injuries at the time of the settlement. (To clarify the "rev'd,", the Supreme Court affirmed the case of *Stephenson* in its entirety but remanded the companion *Isaacson* case related to a question regarding whether it has been properly removed from state court.)

5. The facts regarding Agent Orange and herbicide exposure stated herein became known to me through my extensive experience as a litigator representing the rights of individuals exposed to Agent Orange, as a member of the Agent Orange Coordinating Council, and in other litigation where these issues were central. The basis for my knowledge includes the documentary and testamentary evidence uncovered in litigation and through my service on the Council, depositions that I personally took as a litigator (including one identified below), trial exhibits, a wealth of scientific literature and evidence (including studies and sources identified herein), and scientific conferences I was invited to attend and participate in.

6. Agent Orange was a 50/50 mixture of two herbicides, 2,4,5-T and 2,4-D. The development and use of these herbicides began towards the end of World War II. Widespread use in agriculture began in the early 1950s.

7. Monsanto was one of the major manufacturers of 2,4,5-T. It manufactured its 2,4,5-T at a plant in Nitro, West Virginia. Almost immediately, workers at the plant started to get ill, many suffering from a skin condition called chloracne. It was later found that the implicated chemical was an impurity endemic to the 2,4,5-T production process, (TCDD) which has been colloquially called dioxin though it is only one of a number of dioxin congeners.

8. Monsanto sold its 2,4,5-T both domestically and for use in Vietnam. An estimated 19 million gallons of Agent Orange were mixed, loaded, and sprayed in Vietnam. Dow Chemical also produced 2,4,5-T.

9. In 1965, Dow Chemical found that the higher the temperature used to manufacture 2,4,5-T, the more dioxin was created. Dow changed its manufacturing processes and shared these changes with Monsanto. Monsanto rejected these changes and did not change their production processes. Higher temperature production resulted in greater and quicker production, meaning more money could be earned by Monsanto by continuing to manufacture as it did.

10. With the widespread international use of 2,4,5-T in agriculture and the massive use of it during the Vietnam War, beginning in the early 1970s the medical and scientific community began directing its attention to determining whether adverse health effects were associated with 2,4,5-T.

11. Because cancers, especially lymphopoietic malignancies, such as lymphomas and myelomas, can have lengthy latency periods, the ability of epidemiology to capture such malignancies in studies due to herbicide exposure did not begin to occur for decades. As such, almost three decades passed following the first widespread use of 2,4,5-T before independent scientists began to implicate 2,4,5-T as a causative agent for cancer.

12. The first reported evidence of any linkage came from Sweden with clinical reports in the late 1970s by a group of Scandinavian physicians. *See, e.g.*, L. Hardell, *Malignant Lymphoma of Histiocytic Type and Exposure to Phenoxyacetic Acids or Chlorophenols*, Lancet 55-56 (Jan. 6,

1979); H. Olsson, *Non-Hodgkin's Lymphoma of the Skin and Occupational Exposure to Herbicides*, Lancet 579-580 (Sept. 12, 1981). These were followed with epidemiological studies by the same group. *See* L. Hardell, *Malignant Lymphoma and Exposure to Chemicals, Especially Organic Solvents, Chlorophenols and Phenoxy Acids: A Case-Control Study*, British J. Cancer 43, 169-176 (1981); L. Hardell, *Relation of Soft-Tissue Sarcoma, Malignant Lymphoma and Colon Cancer to Phenoxy Acids, Chlorophenols, and Other Agents*, Scand. J. Work Environ. Health 7, 119-130 (1981).

13. In the early 1980's while several lawsuits related to 2,4,5-T were proceeding, including those by Vietnam veterans, two studies of the highly exposed Monsanto workers in Nitro, West Virginia were published: Judith A. Zack and William R. Gaffey, *A Mortality Study of Workers Employed at the Monsanto Company Plant in Nitro, West Virginia*, *in* Human and Environmental Risks of Chlorinated Dioxins and Related Compounds 575-91 (R. Tucker, A. Young, and A. Gray, 26 vol. 1983) and Judith A. Zack and Raymond R. Suskind, *The Mortality Experience of Workers Exposed to Tetrachlorodibenzodioxin in a Trichlorophenol Process Accident*, Journal of Occupational and Environmental Medicine 22, 11-14 (Jan. 1980). These studies showed no statistically significant increase in cancers among the very highly exposed workers. Monsanto issued a press release headlined "Study Fails to Link 'Agent Orange' to Deaths of Industrial Workers." Both at the EPA and in the Agent Orange litigation these studies were used to buttress Monsanto's position that human beings, unlike animals, were relatively immune from the effects of 2,4,5-T's contaminant and that the significant toxicological findings should be ignored.

14. A review after the Agent Orange litigation was settled revealed inconsistencies between the two papers of the Monsanto workers in Nitro, West Virginia. The studies used different measures to estimate exposure, which resulted in workers listed as unexposed in one study being listed as exposed in the other. Additionally, other workers who should have been included were not. I deposed Monsanto's epidemiologist William R. Gaffey and he testified that the data was all assembled for his study *before* he created the study protocol. This is something that should never be done when conducting an epidemiological study as it leads to the ability to adjust the protocol to "fit" the data.

15. Due to toxicological evidence showing that TCDD was one of the most potent carcinogens ever studied (which was known to Monsanto scientists while it was being sold) in 1985 the Environmental Protection Agency terminated all uses of 2,4,5-T in the United States.

16. Beginning in 1990, I represented the Agent Orange Coordinating Council on a *pro bono* basis. This council was put together by Admiral Elmo Zumwalt, Chief of Naval Operations in Vietnam. The Council was compromised of 25 veteran service organizations, including the American Legion, the Veterans of Foreign Wars, the Disabled American Veterans, and the Vietnam Veterans of America. The purpose of the Council was to seek compensation for Agent Orange-exposed Vietnam veterans. Through 1990 there was no compensation available for Agent Orange exposure from the then Veterans Administration. A team was created by the Council to lobby Congress to either compensate veterans or at least study the adverse human health effects of Agent Orange exposure. This three-person team included a representative from the Vietnam Veterans of America, Admiral Zumwalt, and me.

17. In response to the concerns voiced by Vietnam veterans, their families and the scientific community, Congress recognized a need for an objective scientific appraisal of the association between the increased risk of disease and exposure to Agent Orange and the other herbicides used in support of military operations in Vietnam. In 1991 Congress passed the Agent Orange Act of 1991, Pub. L. No. 102-4, § 3, 105 Stat. 11, 13-15 (codified as amended at 38 U.S.C. § 1116 (1991)).

18. The law tasked the National Academy of Science's Institute of Medicine (NAS-IOM) to create a special committee to study the science and medicine regarding the herbicides used in Vietnam. After an extensive review, the NAS-IOM committee concluded that "sufficient evidence" existed to find a "positive association" between exposure to Agent Orange and the onset of three cancers: soft tissue sarcoma, non-Hodgkin's lymphoma, and Hodgkin's disease.

19. Pursuant to ongoing studies and analysis by the NAS-IOM, over time research has periodically led to a number of compensable conditions related to herbicide exposure: 1) in 1994, Chloracne, Hodgkin's disease, Non-Hodgkin's Lymphoma, Porphyria Cutanea Tarda, Respiratory Cancers, and Soft Tissue Sarcomas; 2) in 1996, Prostate Cancer; 3) in 1998, Multiple Myeloma; 4) in

2000: Diabetes Mellitus Type 2; 5) in 2007: AL Amyloidosis; 6) in 2008, ischemic heart disease and Parkinson's Disease; and 7) in 2010, peripheral neuropathy.

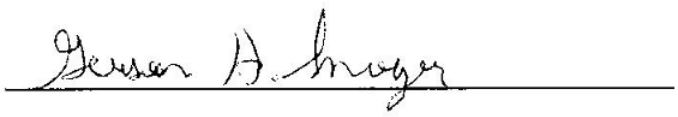
20. Monsanto's conduct with regard to its relatively more recent herbicide, Roundup with glyphosate, has not been dissimilar from the way it previously handled its 2,4,5-T herbicide. This is demonstrated, for instance, by MONGLY03400272-MONGLY03400273, MONGLY03316369-MONGLY03316371, and MONGLY02078597 – MONGLY02078599 which were each listed as exhibits in the Sixth Amended plaintiffs' Exhibit List in the trial of *Pilliod v. Monsanto*, case number RG17862702, in the Superior Court of the State of California, County of Alameda (Exhibit List attached hereto as Exhibit A1).

21. MONGLY03400272 - MONGLY03400273 is an internal Monsanto power point on Monsanto's business objective called Freedom to Operate, or FTO. It was admitted as Plaintiffs' Exhibit 464 in the trial of *Pilliod v. Monsanto*, case number RG17862702, in the Superior Court of the State of California, County of Alameda (Attached hereto as Exhibit A2). It shows that Monsanto had corrupted segments of the published scientific literature and improperly influenced governmental agency positions on glyphosate generally and Roundup specifically. Monsanto's business objective behind these endeavors is internally called its "freedom to operate," which means the freedom to sell chemicals unencumbered by the reality of the harmful effects they may cause.

22. MONGLY03316369 - MONGLY03316371 is an internal Monsanto memo on Freedom to Operate. It was admitted as Plaintiffs' Exhibit 621 in the trial of *Pilliod v. Monsanto*, case number RG17862702, in the Superior Court of the State of California, County of Alameda (Attached hereto as Exhibit A3). It shows Monsanto's goals and plans to ensure their "Freedom to Operate" business objective.

23. MONGLY02078597 – MONGLY02078599 is a Monsanto internal email discussing how Monsanto "ghost wrote" the Williams, et al., 2000 paper. It was admitted as Plaintiff's Exhibit 9 in the trial of *Pilliod v. Monsanto*, case number RG17862702, in the Superior Court of the State of California, County of Alameda (Attached hereto attached as Exhibit A4). It shows that Monsanto routinely engaged in the practice of ghost-writing papers supposedly authored by independent academic scientists.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, that if called to testify I could and would testify competently to the facts stated in this declaration, and that this declaration was executed in Berkeley, California, on March 4, 2021.



Gerson H. Smoger, J.D., Ph.D.

SMOGER DECLARATION

EXHIBIT A1

TRIAL EXHIBIT LIST IN *PILLIOD V. MONSANTO*, CASE NO. RG17862702, JCCP NO. 4953

Michael L. Baum, Esq. (SBN: 119511)
mbaum@baumhedlundlaw.com
R. Brent Wisner, Esq. (SBN: 276023)
rbwisner@baumhedlundlaw.com
Pedram Esfandiary (SBN: 312569)
pesfandiary@baumhedlund.com
BAUM HEDLUND, ARISTEI, & GOLDMAN, P.C.
10940 Wilshire Blvd., 17th Floor
Los Angeles, CA 90024
Telephone: (310) 207-3233
Facsimile: (310) 820-7444

Michael Miller (*pro hac vice*)
mmiller@millerfirmllc.com
Curtis G. Hoke (SBN: 282465)
choke@millerfirmllc.com
THE MILLER FIRM, LLC
108 Railroad Ave
Orange, VA 22960
Telephone: (540) 672-4224
Facsimile: (540) 672-3055

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF ALAMEDA

Alva and Alberta Pilliod,

Plaintiffs,

vs.

Monsanto Company,

Defendant.

Case No.: RG17862702

PLAINTIFF'S SIXTH AMENDED TRIAL EXHIBIT LIST

Hon. Winifred Smith
Dept. 21
Trial Date: March 18, 2019

Pursuant to Alameda County Superior Court Local Rule 3.35(b), Plaintiffs Alva and Alberta Pilliod submits the following Sixth Amended Exhibit List:

1	MONGLY00922458	MONGLY00922460	Agitation against Roundup	11/24/2003
2	MONGLY01192115	MONGLY01192117	Roundup Article in Fremantle Herald	09/21/2009
3	MONGLY00905650	MONGLY00905659	Glyphosate Stewardship, Epidemiology, and the Farm Family Exposure Study	06/11/2002

4	MONGLY01249878	MONGLY01249881	Another Mole Needing a Whacking	03/03/2010
5	MONGLY00977264	MONGLY00977270	IARC Planning	02/05/2015
6	MONGLY00977267	MONGLY00977270	Email re: IARC planning	02/05/2015
7	MONGLY01021559	MONGLY01021563	Email re: IARC	02/10/2015
8	MONGLY01021708	MONGLY01021711	Revised IARC reactive messaging - Glyphosate Key Points of IARC Decision 2B	02/12/2015
9	MONGLY02078597	MONGLY02078599	Email re: IARC response manuscript - IARC Planning	02/19/2015
10	MONGLY03351980	MONGLY03351982	RE: High Level Summary of 2 recent Mesnage studies (also low dose response as FYI)	09/03/2015
11	MONGLY11706579	MONGLY11706583	Seralini- Key points from Americas/Europe and Asia Teleconfereces yesterday	10/11/2012
12	MONGLY01023972	MONGLY01023973	RE: Post-IARC Activities to Support Glyphosate	05/11/2015
13	MONGLY00988559	MONGLY00988560	FW: Glyphosate manuscript	04/23/2015
14	MONGLY02078589	MONGLY02078592	RE: IARC Planning	02/19/2015
15	MONGLY00978170	MONGLY00978173	FW: Poster Abstract	11/02/2015
16	MONGLY03056791	MONGLY03056799	FW: Glyphosate and Prop 65-SAM COHEN	10/06/2015
17	MONGLY07692015	MONGLY07692016	FW· Minute L & G Outreach workshop	02/24/2014
18	MONGLY01179185	MONGLY01179186	Study Shows Herbicides Increase Risk of Non-Hodgkins Lymphoma - Beyond Pesticides October 14	10/14/2008
19	MONGLY02063920	MONGLY02063928	RE: IARC Outreach - IARC Plan	02/24/2015
20	MONGLY00977035	MONGLY00977036	RE: EPA openly discussed IARC findings at a CLA meeting on Thursday	03/14/2015
21	MONGLY06262795	MONGLY06262796	Article re: NHL and Glyphosate Alachor	09/02/2003
22	MONGLY00887558	MONGLY00887560	MCDuffe Paper	12/06/2001
23	MONGLY00890492	MONGLY00890494	The McDuffee article Appears Glyphosate not Mentioned in the Abstract	11/29/2001
24	MONGLY02546318	MONGLY02546319	RE: please review!	09/20/2013
25	MONGLY06398326	MONGLY06398327	RE: dermal absorption	02/10/2003

26	MONGLY06509235	MONGLY06509236	Operator exposure for MON 2139: UK case	11/07/2002
27	MONGLY02142251	MONGLY02142265	Study: Elimination of 14C-Glyphosate in Rhesus Monkeys Following A Single Dose; Percutaneous Absorption of 14C-Glyphosate in Roundup® Formulation in Rhesus t1onkeys Following A Single Topical Dose (Maibach Study)	04/01/1983
28	MONGLY01045298	MONGLY01045306	Employee Business Performance document - Saltmiras,David Anthony	08/20/2013
29	MONGLY00922247	MONGLY00922249	Sea Ursins Study	09/09/2004
30	MONGLY00878065	MONGLY00878067	Popular Herbicide Linked to Cancers	06/23/1999
31	MONGLY00320171	MONGLY00320178	Hardell - A Case-Control Study of NHL and Exposure to Pesticides	03/15/1999
32	MONGLY02321439	MONGLY02321440	Email re: NTP	01/12/2017
33	MONGLY02359075	MONGLY02359084	Email about NTP's proposed review of glyphosate. CLA plans on getting "The Hill" involved.	01/12/2017
34	MONGLY02155826	MONGLY02155832	email re: RE: Pk recovery Wester et al	11/12/2008
35	MONGLY03734971	MONGLY03734971	Heydens email re: Parry Report - E-mail chain	09/16/1999
36	MONGLY02626553	MONGLY02626554	E-mail chain re Meeting Prof Parry 15 Feb 2001	02/19/2001
37	MONGLY01312093	MONGLY01312104	Monsanto Telefax Transmittal Sheet, and attached documents - First Parry report	02/11/1999
38	MONGLY01314233	MONGLY01314283	Evaluation of the potential genotoxicity of Glyphosate, Glyphosate mixtures and component surfactants - Parry Reports and email re Parry Report	00/00/0000
39	MONGLY00878595	MONGLY00878597	Email re: Larry Kier and James Parry - Comments on Parry write-up	09/02/1999

40	MONGLY01312107	MONGLY01312110	Email string where Monsanto discusses hiring James Parry because he is a genotox expert {Draft of minutes? Incomplete and unclear}	01/15/1999
41	MONGLY00877463	MONGLY00877468	RE[5]: Questions about Glyphosate	06/01/1999
42	MONGLY01021648	MOGNLY01021657	URGENT: Draft email for experts to help with IARC	02/27/2015
43	MONGLY00885551	MONGLY00885555	Email RE: European Commission Endocrine Disrupters developments	04/25/2002
44	MONGLY00921329	MONGLY00921345	1999 Roundup Communications Plan	10/30/2000
45	MONGLY01839476	MONGLY01839481	DRAFT Clustering glyphosate formulations with regard to the testing for dermal uptake	07/01/2001
46	MONGLY01210309	MONGLY01210309	Farmer has been selected to be spokeswoman for Monsanto to defend glyphosate	02/26/2015
47	MONGLY02913526	MONGLY02913531	Draft: Glyphosate IARC Monograph	02/23/2015
48	MONGLY00919381	MONGLY00919381	Email from Farmer re: Williams (2012) manuscript	11/18/2010
49	MONGLY03498538	MONGLY03498549	Letter from Australia stating that shipments of Roundup contain excessive levels of NNG	05/06/2010
50	MONGLY01202786	MONGLY01202788	Email re: 1, 4-dioxane	12/10/2009
51	MONGLY01199776	MONGLY01199777	Email re: Donna Farmer	01/16/2009
52	MONGLY01182769	MONGLY01182770	One Last Thing...PK PPT	07/15/2008
53	MONGLY00925905	MONGLY00925912	Email re: NNG	09/23/2004
54	MONGLY00922461	MONGLY00922562	Email re: NNG	09/13/2004
55	MONGLY00891769	MONGLY00891770	Email re: Dr. Parry	09/01/2001
56	MONGLY00889988	MONGLY00889991	Email re: 1, 4-dioxane	01/29/2001
57	MONGLY00921330	MONGLY00921345	Monsanto's strategic public relationship plan	10/30/2000
58	MONGLY00878876	MONGLY00878882	Email re: Samples for Parry	04/27/2000
59	MONGLY01598004	MONGLY01598006	Memo re: Sending samples to Parry	12/10/1999
60	MONGLY00877683	MONGLY00877685	Roundup Mutagenicity	08/03/1999

61	MONGLY01825671	MONGLY01825672	Farmer Email re: Germany, mutagenicity of Roundup	06/03/1999
62	MONGLY01825649	MONGLY01825649	Email re: Jim Parry	05/19/1999
63	MONGLY02719740	MONGLY02719742	RE: New Scientist: Pressure mounts for retraction of GM crop-cancer study	12/03/2012
64	MONGLY07027353	MONGLY07027358	FYI - The Goodman affair: Monsanto targets the heart of science	05/20/2013
65	MONGLY02379308	MONGLY02379311	Email Re: Help Take Action Against Seralini Study -- Write to Journal Editor Today	09/27/2012
66	MONGLY07013734	MONGLY07013735	RE: Letters to the Editor?	09/26/2012
67	MONGLY02259080	MONGLY02259084	RE: Research publication from Argentina and letters to the Editor	09/07/2012
68	MONGLY04278162	MONGLY04278165	Monsanto Memo: Glyphosate Reregistration Standard - Monsanto's position regarding mouse study	08/28/1986
69	MONGLY04268980	MONGLY04268981	Letter to Tim Long from Frank Serdy - Monsanto Memo: Glyphosate mouse study - Additional steps - Monsanto's strategy to hire experts	08/28/1985
70	MONGLY04268982	MONGLY04268983	Letter to T.F. Armstrong, E.E. Debus, and F.S. Serdy from Lyle L. Gingerich - Monsanto Memo re. Adverse Ruling - Roundup S.A.P. Meeting	08/20/1985
71	MONGLY04269049	MONGLY04269050	Letter to Dr. Marvin Kushner from Aleksandar L. Knezevich - Marvin Kushner invoice	04/03/1985
72	MONGLY04277789	MONGLY04277789	Letter to T.F. Evans from George J. Levinskas - Monsanto memo: EPA proposal to classify glyphosate as class C "possible human carcinogen"	04/03/1985
73	MONGLY04269072	MONGLY04269075	Re: Meeting February 21, 1985 - Monsanto meeting minutes - EPA Toxicology Branch/Roundup	02/22/1985

74	MONGLY01023968	MONGLY01023969	RE: Post-IARC Activities to Support Glyphosate	05/11/2015
75	MONGLY06253165	MONGLY06253182	SURFACTANT TOXICOLOGY	00/00/0000
76	MONGLY02063095	MONGLY02063098	RE: Letters to the Editor?	09/26/2012
77	MONGLY00878115	MONGLY00878116	E-mail chain re Comments on Parry Write-up	09/06/1999
78	MONGLY01312109	MONGLY01312108	DRAFT of Minutes - 1/15 Meeting	01/28/1999
79	MONGLY06486896	MONGLY06486898	Re[2]: Actions from12/17 Meeting on Mutagenicity	12/29/1998
80	MONGLY12199705	MONGLY12199706	RE: EOD Media quote check (Chris Bennett/Farm Journal	09/20/2018
81	MONGLY07575511	MONGLY07575517	Sam Murphey sending Kate Kelland Blair materials	04/27/2017
82	MONGLY08162384	MONGLY08162388	Monsanto IARC Budget	10/28/2016
83	MONGLY03550810	MONGLY03550815	RE: Urgent need of details on glyphosate	08/10/2016
84	MONGLY03460238	MONGLY03460280	Action Required - 2016 End of Year Results due July 18	06/15/2016
85	MONGLY02378127	MONGLY02378129	Email Re: Update on project	02/21/2013
86	MONGLY03491019	MONGLY03491026	Sharing FH proposal in Europe	05/25/2016
87	MONGLY08174136	MONGLY08174137	RE: Draft talking points on SAP	02/08/2016
88	MONGLY03343529	MONGLY03343531	EPA talking points	11/18/2015
89	MONGLY03057089 -R	MONGLY03057094-R	RE: Glyphosate and Prop 65- SAM COHEN- DRAFT LETTER	10/05/2015
90	MONGLY00866643	MONGLY00866652	ISSUES PLAN - Farm Aid/ Neil Young - DRAFT - updated 9/16/15	09/16/2015
91	MONGLY12235354	MONGLY12235399	Sam Murphey text messages	09/10/2015
92	MONGLY03500585	MONGLY03500591	RE: GA Update on US Government Outreach - WHO IARC Clarification on Glyphosate	06/22/2015
93	MONGLY00948216	MONGLY00948217	Draft OP Ed material	03/23/2015
94	MONGLY04773726	MONGLY04773727	IARC materials	02/27/2015
95	MONGLY06721006	MONGLY06721023	Minute L & G Outreach workshop	02/24/2014
96	MONGLY03425856	MONGLY03425857	E-mail re Tallowamine in France	04/07/2016
97	MONGLY03390375	MONGLY03390375	E-mail re Glyphosate steering team follow-up	08/07/2015

98	MONGLY03501643	MONGLY03501668	E-mail chain re Intertek Contract A-15-00706	07/31/2015
99			Trial Demonstrative	
100			Trial Demonstrative	
101			Trial Demonstrative	
102			Trial Demonstrative	
103			Trial Demonstrative	
104			Trial Demonstrative	
105			Trial Demonstrative	
106			Trial Demonstrative	
107			Trial Demonstrative	
108			Trial Demonstrative	
109			Trial Demonstrative	
110			Trial Demonstrative	
111			Trial Demonstrative	
112			Trial Demonstrative	
113			Trial Demonstrative	
114			Trial Demonstrative	
115			Trial Demonstrative	
116			Trial Demonstrative	
117			Trial Demonstrative	
118			Trial Demonstrative	
119			Trial Demonstrative	
120			Trial Demonstrative	
121			Trial Demonstrative	
122			Trial Demonstrative	
123			Trial Demonstrative	
124			Trial Demonstrative	
125			Trial Demonstrative	
126			Trial Demonstrative	
127			Trial Demonstrative	
128			Trial Demonstrative	
129			Trial Demonstrative	
130			Trial Demonstrative	
131			Trial Demonstrative	
132			Trial Demonstrative	
133			Trial Demonstrative	
134			Trial Demonstrative	
135			Trial Demonstrative	

136			Trial Demonstrative	
137			Trial Demonstrative	
138			Trial Demonstrative	
139			Trial Demonstrative	
140			Trial Demonstrative	
141			Trial Demonstrative	
142			Trial Demonstrative	
143			Trial Demonstrative	
144			Trial Demonstrative	
145			Trial Demonstrative	
146			Trial Demonstrative	
147			Trial Demonstrative	
148			Trial Demonstrative	
149			Trial Demonstrative	
150			Trial Demonstrative	
151			Trial Demonstrative	
152			Trial Demonstrative	
153			Trial Demonstrative	
154			Trial Demonstrative	
155			Trial Demonstrative	
156			Trial Demonstrative	
157			Trial Demonstrative	
158			Trial Demonstrative	
159			Trial Demonstrative	
160			Trial Demonstrative	
161			Trial Demonstrative	
162			Trial Demonstrative	
163			Trial Demonstrative	
164			Trial Demonstrative	
165			Trial Demonstrative	
166			Trial Demonstrative	
167			Trial Demonstrative	
168			Trial Demonstrative	
169			Trial Demonstrative	
170			Trial Demonstrative	
171			Trial Demonstrative	
172			Trial Demonstrative	
173			Trial Demonstrative	
174			Trial Demonstrative	

175			Trial Demonstrative	
176			Trial Demonstrative	
177			Trial Demonstrative	
178			Trial Demonstrative	
179			Trial Demonstrative	
180			Trial Demonstrative	
181			Trial Demonstrative	
182			Trial Demonstrative	
183			Trial Demonstrative	
184			Trial Demonstrative	
185			Trial Demonstrative	
186			Trial Demonstrative	
187			Trial Demonstrative	
188			Trial Demonstrative	
189			Trial Demonstrative	
190			Trial Demonstrative	
191			Trial Demonstrative	
192			Trial Demonstrative	
193			Trial Demonstrative	
194			Trial Demonstrative	
195			Trial Demonstrative	
196			Trial Demonstrative	
197			Trial Demonstrative	
198			Trial Demonstrative	
199			Trial Demonstrative	
200			Trial Demonstrative	
201			Trial Demonstrative	
202			Trial Demonstrative	
203			Trial Demonstrative	
204			Trial Demonstrative	
205			Trial Demonstrative	
206			Trial Demonstrative	
207			Trial Demonstrative	
208			Trial Demonstrative	
209			Trial Demonstrative	
210			Trial Demonstrative	
211			Trial Demonstrative	
212			Trial Demonstrative	
213			Trial Demonstrative	

214			Trial Demonstrative	
215			Trial Demonstrative	
216			Trial Demonstrative	
217			Trial Demonstrative	
218			Trial Demonstrative	
219			Trial Demonstrative	
220			Trial Demonstrative	
221			Trial Demonstrative	
222			Trial Demonstrative	
223			Trial Demonstrative	
224			Trial Demonstrative	
225			Trial Demonstrative	
226			Trial Demonstrative	
227			Trial Demonstrative	
228			Trial Demonstrative	
229			Trial Demonstrative	
230			Trial Demonstrative	
231			Trial Demonstrative	
232			Trial Demonstrative	
233			Trial Demonstrative	
234			Trial Demonstrative	
235			Trial Demonstrative	
236			Trial Demonstrative	
237			Trial Demonstrative	
238			Trial Demonstrative	
239			Trial Demonstrative	
240			Trial Demonstrative	
241			Trial Demonstrative	
242			Trial Demonstrative	
243			Trial Demonstrative	
244			Trial Demonstrative	
245			Trial Demonstrative	
246			Trial Demonstrative	
247			Trial Demonstrative	
248			Trial Demonstrative	
249			Trial Demonstrative	
250			Trial Demonstrative	
251			Trial Demonstrative	
252			Trial Demonstrative	

253			Trial Demonstrative	
254			Trial Demonstrative	
255			Trial Demonstrative	
256			Trial Demonstrative	
257			Trial Demonstrative	
258			Trial Demonstrative	
259			Trial Demonstrative	
260			Trial Demonstrative	
261			Trial Demonstrative	
262			Trial Demonstrative	
263			Trial Demonstrative	
264			Trial Demonstrative	
265			Trial Demonstrative	
266			Trial Demonstrative	
267			Trial Demonstrative	
268			Trial Demonstrative	
269			Trial Demonstrative	
270			Trial Demonstrative	
271			Trial Demonstrative	
272			Trial Demonstrative	
273			Trial Demonstrative	
274			Trial Demonstrative	
275			Trial Demonstrative	
276			Trial Demonstrative	
277			Trial Demonstrative	
278			Trial Demonstrative	
279			Trial Demonstrative	
280			Trial Demonstrative	
281			Trial Demonstrative	
282			Trial Demonstrative	
283			Trial Demonstrative	
284			Trial Demonstrative	
285			Trial Demonstrative	
286			Trial Demonstrative	
287			Trial Demonstrative	
288			Trial Demonstrative	
289			Trial Demonstrative	
290			Trial Demonstrative	
291			Trial Demonstrative	

292			Trial Demonstrative	
293			Trial Demonstrative	
294			Trial Demonstrative	
295			Trial Demonstrative	
296			Trial Demonstrative	
297			Trial Demonstrative	
298			Trial Demonstrative	
299			Trial Demonstrative	
300			Farmer Road	
301	MONGLY03286032	MONGLY03286033	One pager on Social media	03/11/2016
302			OEHHA announces intention to list glyphosate on PROP 65 list.	09/24/2015
303	MONGLY01031800	MONGLY01031805	Over the past year	05/07/2015
304	MONGLY03929290	MONGLY03929291	Over the past year.	05/07/2015
305	MONGLY06410434	MONGLY06410435	TNO dermal penetration studies	04/05/2002
306	MONGLY01312109	MONGL Y01312108	DRAFT of Minutes - 1/15 Meeting	01/28/1999
307	MONGLY01030799	MONGLY01030803	John,Glyphosate Expert Panel Poster at 2015 SRA Annual Meeting	11/04/2015
308			Roundup FTO Rational, strategic and tactical proposals	N/A
309			Monsanto Company: A Clear Focus Annual 2003 Report	0/0/2003
310			Monsanto Glyphosate Formulations	02/16/2009
311			Label Review Manual	11/01/2013
312			EPA Label Review Manual	08/01/2003
313	MONGLY07742278	MONGLY07742303	Assurance of Discontinuance	05/05/2017
314	MONGLY01922198	MONGLY01922238	Advertisements	07/25/2006
315	MONGLY07705580	MONGLY07705581	Scotts/Monsanto IARC, Social Pressures and FTO	09/14/2015
316	MONGLY07221986	MONGLY07221987	Glyphosate Content Overview Grid	06/15/2015
317	MONGLY05522761		Cancer warning on Gly labels in Andean Region	
318	MONGLY03098330	MONGLY03098335	Glyphosate Subject: Statements 3-26-02	07/13/2015
319	MONGLY07886580	MONGLY07886583	Lawn and Garden Follow Up	05/14/2015

320	MONGLY07192225	MONGLY07192227	Agriculutral benefits	
321	MONGLY01251600	MONGLY01251601	Glyphosate Spokesperson First-person Interview Conversation Central Talking Points	03/01/2015
322	MONGLY02065525	MONGLY02065527	Seralini and de Vendomois on You Tube	09/27/2012
323			Article withdrawal	
324			FCT Webpage	0/0/2019
325	MONGLY11706579	MONGLY11706583	Seralini- Key points from Americas/Europe and Asia Teleconfereces yesterday	10/11/2012
326	MONGLY02546318	MONGLY02546320	please review!	09/20/2013
327			Letter to FCT editor	0/0/2014
328			Food and Chemical Toxicology Journal Statement	
329	MONGLY05254084	MONGLY05254085	Glyphosate	09/24/2016
330	HAYES 00517	HAYES 00519	Seralini paper:FCT-12-D-00608 COMMENTS FOR ORIGINAL SUBMISSION	
331			Letter to the editor	0/0/2013
332	HAYES 00223	HAYES 00225	Letter from Wally, Sue, Jose L., Miroslav, Sigi, and Bryan	
333	MONGLY02288197	MONGLY02288198	FCT Editor and Publisher defense of peer review	
334	MONGLY01093036	MONGLY01093047	Email re Long term toxicity of a Roundup herbicide	09/20/2012
335	MONGLY04437587	MONGLY04437587	Goals	N/A
336	MONGLY00923065	MONGLY00923066	Position on Parry's recommendations	02/13/2001
337	MONGLY00932998	MONGLY00933003	More NK603 studies underway?	02/19/2014
338	MONGLY00932969	MONGLY00932974	More NK603 studies underway?	02/19/2014
339	MONGLY00989918	MONGLY00989918	IARC Evaluation of Glyphosate	10/15/2014
340	MONGLY04920222	MONGLY04920227	Amendment to Acquavella consulting	11/01/2014
341	MONGLY09572248	MONGLY09572253	Murphey promotion	06/16/2017
342	MONGLY01021378	MONGLY01021378	Experts to reach out to defend gly in the media	03/04/2015
343	MONGLY03398169	MONGLY03398171	Glyphosate regional issues support	08/28/2015

344	MONGLY03487960	MONGLY03487967	Germany outreach	05/25/2016
345	MONGLY05600811	MONGLY05600814	Political Outreach - Phase II	07/06/2016
346	MONGLY03343539	MONGLY03343541	EPA talking points	11/19/2015
347	MONGLY07673376	MONGLY07673377	Benbrook NEJM Article discussino	08/19/2015
348	MONGLY12167637	MONGLY12167640	2015-08-18 NEJM Blog Post-version	08/19/2015
349	MONGLY03402231	MONGLY03402234	Confering with EPA on Statement	04/21/2016
350	MONGLY03550799	MONGLY03550801	Talking points for Gina McCarthy meeting	08/09/2016
351	MONGLY07574531	MONGLY0757 4532	Urgent/Reuters request for comment on a story regarding IARC/glyphosate	10/25/2016
352	MONGLY11789921	MONGLY11789922	Draft strategies	04/22/2015
353	MONGLY03342289	MONGLY03342305	FW: Draft letter, one-pager	10/19/2015
354	MONGLY06365745	MONGLY06365755	Glyphosate DRAFT campaign outline	07/19/2016
355	MONGLY00989762	MONGLY00989764	IARC Glyphosate Monograph Publication	06/22/2015
356			Rule 30(b)(6) Depo Notice	11/09/2018
357			Causation studies diagram	N/A
358			Exposure Study	N/A
359			Farmer testimony	09/26/2018
360	MONGLY00889984	MONGLY00889987	Email re: Roundup disparagement on organic listservs	05/26/2000
361			Regulatory actions on glyphosate	N/A
362	MONGLY05530894	MONGLY05530917	Gray et al. (2000)	0/0/2000
363			gly mouse oncogenicity study	04/03/1985
364	MONGLY01616600	MONGLY01616603	Food & Chem Tox webpage	N/A
365	MONGLY06777917	MONGLY06777927	Boycott of Elsevier	12/11/2013
366	MONGLY02286842	MONGLY02286843	Manuscript CBT0548 for review	08/19/2008
367	MONGLY01238649	MONGLY01238676	CBT0548.rtf	09/05/2008
368	MONGLY01189468	MONGLY01189468	CBT0548	09/09/2008
369	MONGLY01238767	MONGLY01238772	Peer Review of Glyphosate Cytotoxicity submission to Cell Biology & Toxicology	09/12/2008
370	MONGLY03102142	MONGLY03102190	Sustainalytics	11/10/2015

371			Is Roundup a cancer causer diagram	N/A
372	MONGLY06403282	MONGLY06403322	OPEX MON 78273 UK.doc	06/19/2003
373	MONGLY02350956	MONGLY02350957	Monsanto OEHHA Presentation	11/23/2015
374	MONGL Y03286032	MONGL Y03286033	One pager on Social media	03/11/2016
375	MONGLY02060344	MONGLY02060345	Email re ATSDR	06/24/2015
376	JGTF000284	JGTF000291	JGTF Treasurer Proposal, Overview of Estimated Expenditures and Cash Flow Analysis	07/06/1905
377	KIERPROD0002387 2	KIERPROD00023877	RE: Draft Glyphosate Manuscript, Tables and Figures.	08/30/2012
378	HAYES_00226	HAYES_00239	"A manuscript 'Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize' from Gilles-Eric Seralini and collegues was submitted to Food and Chemical Toxicology"	09/12/2012
379	JGTF000264	JGTF000275	PowerPoint Printout, "Opening Comments Strategy Plan," JGTF Admin Committee Meeting, September 24, 2013	09/24/2013
380	JGTF000374	JGTF000379	"Guidelines for Member Representatives Who Also Advise Non-Members That Are Adverse to the JGTF," Peter L. Gray, Esq., Counsel for JGTF, September 23, 2014,	09/23/2014
381	MONGLY01224009	MONGLY01224014	Aquavella Consultant Agreement Letter	11/10/2014
382	KIERPROD0002709 3	KIERPROD00027094	RE: Critical Reviews in Toxicology - Decision on Manuscript ID BTXC-2015-0001.Rl	01/18/2015
383	KIERPROD0002699 2	KIERPROD00026997	Re: Greim et al. (2015) & Kier (2015) summaries, abstracts and sound bytes	02/20/2015
384			EPA Folks going to IARC	2/20/2015

385			March 13, 2015 Email Exchanges (Ross Exh. 23)	3/13/2015
386	ACQUAVELLAPROD 00010215	ACQUAVELLAPROD 00010221	WHO Report and Cancer - ICABR Session in June	04/09/2015
387	CROPLIFE00002982	CROPLIFE00002983	[CLA-HARC] HARC conference call - IARC agenda item [5 Attachments]	04/22/2015
388	EPAHQ_005644	EPAHQ_005645	Email to Jess Rowland from Jack Housenger, EPAHQ_005644	05/22/2015
389	CROPLIFE00009624	CROPLIFE00009625	Follow up to IARC call	05/26/2015
390	ACQUAVELLAPROD 00010118	ACQUAVELLAPROD 00010120	E-mail re IARC updates	06/02/2015
391	KIERPROD0001526 5	KIERPROD00015271	Comments on Bolognesi et al 2009 Human Genotoxicity Blomonitoring Studies	06/17/2015
392	KIERPROD0001839 6	KIERPROD00018396	Top Two IARC Delay Reasons	07/14/2015
393	ACQUAVELLAPROD 00017681	ACQUAVELLAPROD 00017683	Email re: Intertek Code of Ethics	07/30/2015
394	ACQUAVELLAPROD 02463444	ACQUAVELLAPROD 02463446	E-mail chain re revised manuscript and signed contract	08/25/2015
395	KIERPROD0001526 4	KIERPROD00015264	RE: Comments on Human Genotoxicity Biomonitoring	09/02/2015
396	ACQUAVELLAPROD 00009991	ACQUAVELLAPROD 00009991	Epidemiology.docx	09/25/2015
397	ACQUAVELLAPROD 00022326	ACQUAVELLAPROD 00022334	E-mail chain re manuscript decision	10/26/2015
398	EPA_HQ0000204	EPA_HQ0000210	12/8/2015 Email chain email from Lynn Flowers to Vince Cogliano re ORD assessments	12/08/2015
399	EPA-HQ-2016-010431_00000037	EPA-HQ-2016-010431_00000039	Summary of ORD comments on OPP's glyphosate cancer assessment	12/14/2015
400	ACQUAVELLAPROD 00014559	ACQUAVELLAPROD 00014560	RE:re invoicing	01/07/2016
401			April 1, 2016 Email from Kathryn Guyton (Ross Exh. 24)	4/1/2016
402	ACQUAVELLAPROD 00012359	ACQUAVELLAPROD 00012363	Reviewers	04/06/2016

403			April 7, 2016 Letter from Angkana Santhiprechachit (Ross Exh. 25)	4/7/2016
404	EELI_000003	EELI_0000038	Email from Jim Jones to EPA Administrator McCarthy, EELI_000003	05/03/2016
405	ACQUAVELLAPROD 00012030	ACQUAVELLAPROD 00012035	Critical Reviews in Toxicology - Decision on Manuscript	05/14/2016
406	WEEDPROD000001 29	WEEDPROD000001 36	Reviewer comments for the Intertek epidemiology manuscript	05/14/2016
407	RM000322	RM000322	Titles for Constellation of Glyphosate papers	5/14/2016
408	Collins00000076	Collins00000077	Questions Concerning Section 7 of Issue Paper 09 20 16	09/20/2016
409	ACQUAVELLAPROD 00020178	ACQUAVELLAPROD 00020188	Acquavella C.V.	10/01/2016
410	CROPLIFE00021321	CROPLIFE00021323	RE: RSC pre-reads	10/06/2016
411	CROPLIFE00002475	CROPLIFE00002476	My voicemail just left for you.	10/13/2016
412	CROPLIFE00000004	CROPLIFE00000005	[CLA-FoodBev] SOC Preread-glyphosate 12 13 16 jec [1 Attachment]	12/13/2016
413			Aaron Blair C.V.	02/06/2017
414			Aaron Blair Curriculum Vitae	2/6/2017
415	RM000457	RM001192	Production File from Roger McClellan	03/16/2017
416			Plaintiffs' Cross Notice to take oral and video taped deposition of Dr. Matthew Ross (Ross Exhibit 2)	05/02/2017
417	RM000480	RM000481	Glyphosate papers published in CRT	9/18/2017
418	RM000482	RM000493	Glyphosate Special Issue	9/20/2017
419	RM000508	RM000512	RE: Fw: GLYPHOSATE SPECIAL ISSUE	9/22/2017
420			This 8-page letter was sent to Roger McClellan, Charles Whalley, and the Committee on Publication Ethics	10/12/2017
421	RM000672	RM000677	Glyphosate Review Retraction Request	7/6/2018
422			[Website screencaps]	00/00/0000

423			Curriculum Vitae - Larry D. Kier, Ph.D.	00/00/0000
424	RM000001	RM000455	Production File from Roger McClellan	N/A
425	RM000001	RM001196	Production File from Roger McClellan	N/A
426	MONGLY04253439	MONGLY04253439	Letter from L.H. Hannah to Dr. Paul Wright	08/31/1971
427	MONGLY04256438	MONGLY04256439	Letter from Irene Dressler to Dr. Paul Wright	10/04/1973
428	MONGLY01420869	MONGLY01420870	Adams Annual Review	06/21/1995
429	MONGLY00885870	MONGLY00885874	DRAFT Background Thoughts for the Communications Subcommittee Farmers' health profile	07/22/1997
430	MONGLY06218548	MONGLY06218550	Meeting Minutes	09/24/1998
431	MONGLY00555372	MONGLY00555379	Review of Hardell "A Case-control of NHL and Exposure to Pesticides" by Acquavella	04/14/1999
432	MONGLY06486905	MONGLY06486908	Re: Meeting Minutes 2/25	04/19/1999
433	MONGLY00904009	MONGLY00904011	RE: FW· SCIENTIFIC OUTREACH COUNCIL MEETING	05/26/1999
434	MONGLY00904772	MONGLY00904789	PLEASE READ Info Needed by 6/17 Re: SO Goals SciOutPlan.doc	06/16/1999
435	MONGLY03751016	MONGLY03751016	Roundup Documents	06/21/1999
436	MONGLY00236478	MONGLY00236481	Comments: Draft Guidance on Mandatory/Advisory Labeling	07/06/1999
437	MONGLY01869261	MONGLY01869370	Glyphosate Mammalian Manuscript	07/30/1999
438	MONGLY00877697	MONGLY00877699	RE: Roundup mutagenicity	08/05/1999
439	MONGLY00878075	MONGLY00878076	Evaluation of the Parry report	09/06/1999
440	MONGLY01596286	MONGLY01596286 _0010	Update on Glyphosate Epidemiology Activities GGTP Meeting PowerPoint	09/07/1999
441	MONGLY00905085	MONGLY00905194	Draft Safety Evaluation and Risk Assessment of the Herbicide Roundup and Its Active Ingredient, Glyphosate, for Humans	09/15/1999
442	MONGLY00894003	MONGLY00894008	Very Rough Draft of Adami Proposal for ECPA	11/03/1999
443	MONGLY07868844	MONGLY07868884	Roundup Product Line Review	02/15/2000

444	MONGLY02932440	MONGLY02932441	NHL abstract	05/12/2000
445	MONGLY02624347	MONGLY02624349	Kudos on Publication of Roundup Tox Paper - now posted on the internet	05/12/2000
446	MONGLY07080361	MONGLY07080369	Site Visit to Minnesota Field Site	07/05/2000
447	MONGLY02932442	MONGLY02932443	NHL and the Pesticide Hypothesis: Dose Response	08/21/2000
448	MONGLY02628625	MONGLY02628628	ISEE Meeting - Epidemiology Studies re Glyphosate	08/24/2000
449	MONGLY00923065	MONGLY00923066	RE: Position on Parry's recommendations	02/13/2001
450	MONGLY01853191	MONGLY01853191	Slides: AHS Update MTG	07/25/2001
451	MONGLY00948218	MONGLY00948223	Glyphosate and Cancer-Idiosyncrasies at	03/23/2003
452	MONGLY02031949	MONGLY02031952	Round-Up Information for Posting on the Net	06/15/2004
453	MONGLY00922560	MONGLY00922561	Email re: AHS	11/18/2004
454			Scientific Review and Evaluation	1/23/2006
455	MONGLY02052867	MONGLY02052867	E-mail re 2007 Chemistry Goals from the Regulatory Leadership Team Document titled "Glyphosate"	09/11/2006
456	MONGLY03101108	MONGLY03101109	FYI - Aerial Spraying of Herbicide 'damages DNA'	05/18/2007
457	MONGLY02053978	MONGLY02053979	E-mail chain re Glyphosate re-registration in the US	04/21/2008
458	MONGLY01185784	MONGLY01185822	Re: Mandel Draft	05/22/2008
459	MONGLY01185825	MONGLY01185864	Mandel Draft	05/22/2008
460	MONGLY01992784	MONGLY01992785	Agenda/Awareness File August 4th @ 11:30	08/04/2008
461	MONGLY02286842	MONGLY02286843	FW· Manuscript CBT0548 for review	08/19/2008
462	MONGLY01238768	MONGLY01238772	Healy Peer Review Comments	09/01/2008
463	MONGLY01189468	MONGLY01189468	Email re: peer review	09/09/2008
464	MONGLY03400272	MONGLY03400273	Roundup FTO Growth initiative	02/12/2009
465	MONGLY02343101	MONGLY02343105	RE: Dermal penetration protocols	02/23/2009
466	MONGLY03021301	MONGLY03021307	RE: history of AHS FOIA for your consideration	03/05/2009
467	MONGLY01013201	MONGLY01013204	Email re: Peer Review	09/16/2009

468	MONGLY02221147	MONGLY02221148	Re: EUROTOX 2010 in Barcelona 19-23 July	09/23/2009
469	MONGLY00947796	MONGLY00947798	"General suggestions on approach:"	11/15/2009
470	MONGLY02303997	MONGLY02303998	Email from Saltmiras attaching peer review comments he wrote for Chuck Healy	11/19/2009
471	MONGLY02062439	MONGLY02062440	RE: KP conversation on POEA	02/01/2010
472	MONGLY02350912	MONGLY02350918	E-mail re JGTF 4 Feb 2010 Meeting Minutes	02/16/2010
473	MONGLY02061150	MONGLY02061153	Email re: Seralini Manuscript	04/12/2010
474	MONGLY01204075	MONGLY01204075	Letter to Grant from Gladyshev re Elevated levels of Toxicity in Roundup	06/08/2010
475	MONGLY03106284	MONGLY03106322	Joint Glyphosate Task Force, LLC, Joint Data Development and Limited Liability Company Agreement	06/25/2010
476	MONGLY02013059	MONGLY02013063	Email re: POEA	09/21/2010
477	MONGLY00919381	MONGLY00919445	First Half	11/18/2010
478	MONGLY02406325	MONGLY02406427	Second Half and Additional Articles	12/01/2010
479	MONGLY02067858	MONGLY02067859	FW: Updated glyphosate activities presentation for Friday's CPTLT meeting	12/08/2010
480	MONGLY00983996	MONGLY00983999	E-mail chain re TWG-RWG updates	05/12/2011
481	MONGLY03779061	MONGLY03779063	Re: Susan Keigley	08/19/2011
482	MONGLY01093149	MONGLY01093153	FW: Larry Kier Confidentiality Agreement for GTF member companies holding proprietary Genotoxicity Study Reports	01/03/2012
483	MONGLY02117800	MONGLY02117804	Monsanto Manuscript Clearance Form Global Regulatory - Review of Genotoxicity of Glyphosate and Glyphosate Based Formulations	02/29/2012
484	MONGLY02681107	MONGLY02681108	E-mail re potential experts	03/29/2012
485	MONGLY02681109	MONGLY02681115	"Potential Monsanto Experts,"	03/29/2012
486	MONGLY02276120	MONGLY02276122	RE: Manuscript Guidance	05/31/2012
487	MONGLY02880211	MONGLY02880213	"Monsanto Adverse Effects Committee Meeting Agenda"	07/12/2012

488	MONGLY02145917	MONGLY02145930	AW· Genotox Review: your approval requested!	07/19/2012
489	MONGLY02259060	MONGLY02259064	Email Re: Research Publication from Argentina and letters to the Editor	09/07/2012
490	MONGLY02185741	MONGLY02185742	Authorization Letter.doc	09/07/2012
491	MONGLY02259111	MONGLY02259115	Email Re: Research Publication from Argentina and letters to the Editor (2nd)	09/08/2012
492	MONGLY02788071	MONGLY02788076	RE: Manuscript Moving Onward	09/18/2012
493	MONGLY07013734	MONGLY07013735	Email Re: Letters to the Editor	09/26/2012
494	MONGLY00900629	MONGLY00900633	Chassy / Hayes	09/26/2012
495	MONGLY02379308	MONGLY02379311	Email Re: Help Take Action Against Seralini Study -- Write to Journal Editor Today	09/27/2012
496	MONGLY01123608	MONGLY01123660	Manuscript - Kier & Kirkland+ Environ Conc.docx	12/06/2012
497	MONGLY01174848	MONGLY01174849	Reviewer Invitation for FCT-D-13-00129	01/22/2013
498	MONGLY01129165	MONGLY01129166	RE: Co-Author	01/25/2013
499	MONGLY04086537	MONGLY04086541	RE: Adding Author	01/28/2013
500	MONGLY03293245	MONGLY03293254	Various dates of text messages showing collusion with EPA on glyphosate. They plan on calling key Democrats to pressure the EPA on glyphosate	02/11/2013
501	MONGLY00980158	MONGLY00980161	RE: Publication list	06/27/2013
502	MONGLY03305734	MONGLY03305739	"Thoughts for Global Summit Intro Talk, Susan Martino-Catt,"	07/01/2013
503	MONGLY00940540	MONGLY00940546	FYI - Open Letter to Monsanto from Mom - Moms Across America	07/06/2013
504	MONGLY01995675	MONGLY01995675	E-mail re animal performance trends	09/11/2013
505	MONGLY00981878	MONGLY00981881	Email re: surfactant manuscripts	02/19/2014
506	MONGLY03560399	MONGLY03560402	E-mail chain re potential lawsuit	04/03/2014

507	MONGLY03549275	MONGLY03549280	E-mail: Sodium sulfite/what is the resolution of this? - NNH issue	05/09/2014
508	MONGLY00964333	MONGLY00964334	Email re: Meta-analysis	06/16/2014
509	MONGLY01147225	MONGLY01147227	Email re: Kumar Study	10/03/2014
510	MONGLY00989918	MONGLY00989918	Email re: IARC review - Evaluation of Glyphosate	10/15/2014
511	MONGLY00989923	MONGLY00989925	IARC Evaluation of Glyphosate	10/20/2014
512	MONGLY00977040	MONGLY00977043	E-mail chain re PPCR: US, 10_29_2014, Glyphosate, IARC Review	11/05/2014
513	MONGLY07459156	MONGLY07459156	Ranger Pro Exposure	11/11/2014
514	MONGLY03340964	MONGLY03340965	Email attaching form letters	12/01/2014
515	MONGLY03340967	MONGLY03340967	Copy of Form Letter in support of glyphosate re-registration	12/01/2014
516	MONGLY11696235	MONGLY11696235	RE: EPA Glyphosate	01/15/2015
517	MONGLY02682357	MONGLY02682371	2014 Annual Adverse Effects Reporting Notification	01/22/2015
518	MONGLY01087311	MONGLY01087317	FW· Greim et al. (2015) & Kier (2015) summaries, abstracts and sound bytes	02/20/2015
519	MONGLY04022335	MONGLY04022336	Fwd: Liability Concerns	02/22/2015
520	MONGLY01666042	MONGLY01666047	IARC Glyphosate Draft	02/23/2015
521	MONGLY02447265	MONGLY02447298	"Glyphosate Epidemiology Review, Final Report," Exponent,	02/23/2015
522	MONGLY02063852	MONGLY02063859	IARC Outreach	02/24/2015
523	MONGLY00946857	MONGLY00946858	E-mail re technical review for IARC meeting	02/24/2015
524	MONGLY02649473	MONGLY02649484	ACSH	02/26/2015
525	MONGLY009401670	MONGLY009401671	E-mail re general suggestions on approach	02/26/2015
526	MONGLY00947787	MONGLY00947795	E-mail re biblio and approach	02/26/2015
527	MONGLY02740203	MONGLY02740205	E-mail re IARC project plan	02/26/2015
528	MONGLY02740206	MONGLY02740208	General suggestions on approach	02/26/2015
529	MONGLY01322037	MONGLY01322064	Donna Farmer's media training packet - Redirect questions to the answers you want to give	03/02/2015
530	MONGLY02698209	MONGLY02698216	E-mail chain re Glyphosate IARC assessment	03/09/2015

531	MONGLY00977253	MONGLY00977255	EPA openly discussed IARC findings at a CLA meeting on Thursday	03/14/2015
532	MONGLY01981660	MONGLY01981665	E-mail chain re request for support for ACSH, 2015, with "impacts"	03/16/2015
533	MONGLY01926876	MONGLY01926880	[CLA-HARC) IARC Monographs (1 Attachment]	03/17/2015
534	MONGLY00990361	MONGLY00990361	RE: CE Collaboration Project	03/17/2015
535	MONGLY03827415	MONGLY03827416	IARC Review - Pearce, Blair	03/17/2015
536	MONGLY01971054	MONGLY01971058	E-mail chain re additional experts	03/18/2015
537	MONGLY03343371	MONGLY03343396	[Email w/ attachments - EPA Glyphosate Review -- NO SUBJECT LINE]	03/23/2015
538	MONGLY00948216	MONGLY00948217	E-mail re OP Ed material	03/23/2015
539	MONGLY01991403	MONGLY01991405	Medical &c UPDATE	03/25/2015
540	MONGLY02733179	MONGLY02733183	E-mail chain re glyphosate expert list	03/25/2015
541	MONGLY02520833	MONGLY02520838	IARC Talking Points for Donna	03/26/2015
542	MONGLY01269816	MONGLY01269817	Junk Science Quote	04/02/2015
543	MONGLY00965390	MONGLY00965390	March 2015 FIFRA 6(a)(2) Reports	04/15/2015
544	MONGLY00937355	MONGLY00937363	E-mail with attachment: Final minutes on March 6th & 20th JGTF Steering Committee calls	04/16/2015
545	MONGLY03210343	MONGLY03210346	Ontario Airport/City of Los Angeles Bid- Carcinogen Disclaimer	04/24/2015
546	MONGLY03929023	MONGLY03929023	Email re: Jess Rowland	04/27/2015
547	MONGLY00987755	MONGLY00987758	RE: Glyphosate IARC Question	04/28/2015
548	MONGLY01994735	MONGLY01994738	Email re: Jess rowland	04/29/2015
549	MONGLY00954300	MONGLY00954301	E-mail with attachment: Post-IARC Meeting Science Proposals	04/29/2015
550	MONGLY03023810	MONGLY03023811	Email from Gould re : Parent from San Mateo Voice Mail	04/30/2015
551	MONGLY01228576	MONGLY01228577	RE: Post-IARC Activities to Support Glyphosate	05/11/2015
552	MONGLY01213912	MONGLY01213914	The Doctors	05/21/2015

553	MONGLY02953363	MONGLY02953366	Fwd: US Government Outreach - WHO IARC Clarification on Glyphosate	06/05/2015
554	MONGLY07121911	MONGLY07121913	Consumer Reports on Health Article	06/16/2015
555	MONGLY03500777	MONGLY03500777	Proposal for Glyphosate expert panel review Powerpoint.	06/18/2015
556	MONGLY03064695	MONGLY03064702	RE: GA Update on US Government Outreach - WHO IARC Clarification on Glyphosate	06/24/2015
557	MONGLY04028722	MONGLY04028722	Email re: ATSDR review	06/24/2015
558	MONGLY00977308	MONGLY00977309	RE: IARC Monograph and Expert Panel	06/25/2015
559	MONGLY00943389	MONGLY00943390	E-mail re expert panelists	06/29/2015
560	MONGLY00992949	MONGLY00992952	RE: Expert Panel	07/01/2015
561	MONGLY02082826	MONGLY02082827	E-mail chain re expert panelists	07/01/2015
562	MONGLY03853393	MONGLY03853402	Email re: ATSDR meeting	07/21/2015
563	MONGLY00940255	MONGLY00940257	E-mail re DPR goals and highlights	07/31/2015
564	MONGLY02685329	MONGLY02685330	E-mail re Glyphosate session for Med/ESH	08/05/2015
565	MONGLY01183933	MONGLY01183936	RE: Keith	08/07/2015
566	MONGLY01680756	MONGLY01680757	PROJECT AMENDMENT LETTER - to Consulting Agreement dated August 17 2015, between Larry D. Kier and Monsanto Company	08/20/2015
567	MONGLY00994301	MONGLY00994304	Email re: animal bioassay	08/28/2015
568	MONGLY02844211	MONGLY02844228	Email and attachment from Heydens attaching draft Intertek manuscript.	08/28/2015
569	MONGLY01749367	MONGLY01749368	"To the Editor: GMOs, Herbicides, and Public Health,"	09/01/2015
570	MONGLY07087986	MONGLY07087989	ISSUE Alert: State of California intends to add glyphosate to Prop 65 list	09/04/2015
571	MONGLY07107482	MONGLY07107483	CA and Glyphosate	09/09/2015
572	MONGLY07120036	MONGLY07120038	Fwd: California EPA Moves to Label Monsanto's Roundup	09/10/2015

			'Carcinogenic' I East Bay Express	
573	MONGLY01031800	MONGLY01031805	Email re: Prop 65 stakeholds and Attachments of Draft letters	09/24/2015
574	MONGLY02133785	MONGLY02133785	Email from Acquavella sending Intertek epidemiology manuscript for Monsanto's reviews and edits	09/30/2015
575	MONGLY00945807	MONGLY00945807	E-mail re glyphosate IARC decision	09/30/2015
576	MONGLY03315608	MONGLY03315609	FW: Glyphosate litigation messaging	10/05/2015
577	MONGLY00904722	MONGLY00904731	E-mail chain re Glyphosate and Prop 65 – Sam Cohen	10/12/2015
578	MONGLY00965421	MONGLY00965423	"Comments on Plant Biotechnology," Ronald Kleinman, MD,	10/15/2015
579	MONGLY02133654	MONGLY02133744	Exposures to Glyphosate, Draft Report Attached	10/23/2015
580	MONGLY02133654	MONGLY02133744	Exposures to Glyphosate, Draft Report Attached	10/23/2015
581	MONGLY07101772	MONGLY07101773	Tools to help you address local concerns about IARC and litigation claims with glyphosate	10/30/2015
582	MONGLY00970639	MONGLY00970641	E-mail chain re background and recommendations on The Atlantic	11/02/2015
583	MONGLY00970641	MONGLY00970661	"The Hypothesis in Generation: Confronting Epidemiolgoy, Fear, Public Policy, and the limits of Knowledge, "Danial A. Goldstein, MD	11/02/2015
584	MONGLY01030799	MONGLY01030803	Email from Acquavella re: Ghostwriting	11/04/2015
585	MONGLY01030787	MONGLY01030793	Email from Acquavella, Ghostwriting is unethical	11/06/2015
586	MONGLY02736383	MONGLY02736389	Email from the Epidemiology panel	11/17/2015
587	MONGLY01665907	MONGLY01665909	Monsanto memo - re meeting with Gina McCarthy	01/01/2016

588	MONGLY00999487	MONGLY00999490	RE: Glyphosate Expert Panel Manuscripts	01/06/2016
589	MONGLY01003669	MONGLY01003731	Email attaching Epidemiology manuscript with Heyden's edits incorporated - IARC Epidemeology Edits	01/07/2016
590	MONGLY00998682	MONGLY00998685	Email from Bill Heyden to Intertek attaching manuscript with his edits	01/13/2016
591	MONGLY01041641	MONGLY01041642	FW· Genotoxicity Panel Final Manuscript	01/21/2016
592	MONGLY07089419	MONGLY07089423	Day 1 Update: Prop 65 Legal Action	01/25/2016
593	MONGLY03379079	MONGLY03379084	Email re: Housenger	02/02/2016
594	MONGLY00952715	MONGLY00952717	E-mail chain re AAPCC symposium	02/03/2016
595	MONGLY02085862	MONGLY02085863	Email re: Intertek manuscript	02/04/2016
596	MONGLY01000676	MONGLY01000729	RE: summary article	02/09/2016
597	MONGLY03381565	MONGLY03381570	RE: Reuters Special Report: The World Health Organisation's critical challenge - healing itself	02/09/2016
598	MONGLY01000676	MONGLY01000679	Email from Heydens to Intertek re: editing manuscript	02/09/2016
599	MONGLY02970344	MONGLY02970348	Hugh EPA Brief	02/25/2016
600	MONGLY02054088	MONGLY02054091	RE: Congratulations -- Product Stewardship Spotlight - Saltmiras wins Stewardship award	04/19/2016
601	MONGLY02793243	MONGLY02793244	Reference for Carcinogens	04/25/2016
602	MONGLY03391458	MONGLY03391460	Email re: October CARC report	05/02/2016
603	MONGLY02359008	MONGLY02359014	RE: Delaration of interest	05/09/2016
604	MONGLY02365099	MONGLY02365101	E-mail chain re IARC – NAPP Epidemiology Study Abstract re: Glyphosate and NHL, Bates	06/01/2016
605	MONGLY02360732	MONGLY02360734	Re: Need for telephone conversation/ Followup	07/05/2016
606	MONGLY03555680	MONGLY03555685	RE: A Review of the Carcinogenic Potential of Glyphosate by Four Independent Expert Panels and Comparison to the IARC Assessment	07/25/2016

607	MONGLY03550799	MONGLY03550801	Talking points for conversation with Gina.docx	08/09/2016
608	MONGLY08076980	MONGLY08076982	Summary of Yesterday's Meeting Between Hugh and EPA Administrator McCarthy	09/01/2016
609	MONGLY04962809	MONGLY04962813	Extension of Consultant Agreement	09/15/2016
610	MONGLY07063555	MONGLY07063576	Croplife America's This Week & Next: November 10, 2016	11/17/2016
611	MONGLY12090419	MONGLY120904120	Email Re: Sentinel Notice - Upcoming Expiration - Consulting agreemnt with A. Wallace Hayes expires 8/9/2017 (A-16-03494)	06/12/2017
612	MONGLY07099001	MONGLY07099001	Prop 65 cost on CA Municipalities Markets	01/18/2018
613	MONGLY01594842	MONGLY01594848	Memo re: Product Safety Team goals - 2004 draft Tox goals	0/0/2004
614	MONGLY00340901	MONGLY00340902	NAPP Poster Presentation	0/0/2014
615	MONGLY00965391	MONGLY00965397	Adverse event Repots of Monsanto products	0/0/2015
616	MONGLY00940256	MONGLY00940257	Business Goals - DPR 2015 Highlights	0/0/2015
617	MONGLY00940258	MONGLY00940261	Business Goals - DPR 2015 Highlights	0/0/2015
618	MONGLY00947788	MONGLY00947795	Monsanto IARC Literature/Document List 2015	0/0/2015
619	MONGLY01123609	MONGLY01123660	Review of Genotoxicity Studies of Glyphosate and Glyphosate-Based Formulations	00/00/0000
620	MONGLY01522812	MONGLY01522895	Review of Genotoxicity of Glyphosate and Glyphosate Based Formulations	00/00/0000
621	MONGLY03316369	MONGLY03316371	IARC FOLLOW UP Demonstrate Safety of Glyphosate	00/00/0000
622			Roundup FTO Task Force slides	00/00/0000
623	MONGLY04770656	MONGLY04770685	Monsanto Code of Business Conduct	00/00/0000
624	MONGLY02613913	MONGLY02613918	Business Goals	00/00/0000
625	MONGLY01090874	MONGLY01090874	David Saltmiras Highlights	00/00/0000

626			David Saltmiras, Ph.D., D.A.B.T. - Curriculum Vitae	00/00/0000
627	MONGLY05632420	MONGLY05632420	How to Secure our FTO	03/00/2014
628				
629	MONGLY06990942	MONGLY06990950	RE: Seralini Paper - Letter to the Editor of JFCT from 25 Scientists in 14 Countries	10/01/2012
630	MONGLY02185742	MONGLY02185742	Authorization Letter to Consulting Agreement dated August 21, 2012, between Prof. A. Wallace Hayes and Monsanto Company	09/07/2012
631	MONGLY01838136	MONGLY01838151	Minutes from NA SO meeting: 1-9-01 [w/ attachments]	01/09/2001
632	MONGLY01179974	MONGLY01179978	E-mail chain re SOT meeting	07/01/2015
633	MONGLY03337576	MONGLY03337577	E-mail re EPA IARC	03/15/2015
634	MONGLY03416904	MONGLY03416910	CLA REGISTRATION COMMITTEE MEETING AGENDA	12/10/2015
635	MONGLY00947973	MONGLY00947977	Talking Points on the IARC Assessment of Glyphosate Published Online in Lancet Oncology	03/20/2015
636	MONGLY02350923	MONGLY02350925	The Joint Glyphosate Task Force - Meeting Minutes	02/04/2010
637	MONGLY02590292	MONGLY02590299	REVIEW: Micronuclei and pesticide exposure	00/00/0000
638	MONGLY03316921	MONGLY03316921	Global Glyphosate FTO Strategy	00/00/0000
639	MONGLY03390089	MONGLY03390099	[Presentation - title redacted]	00/00/0000
640	MONGLY03460255	MONGLY03460280	Regulatory and Government Affairs FY16 Results Summary	00/00/0000
641			List of names, organizations, and email addresses	00/00/0000
642	MONGLY03558820	MONGLY03558823	Update on proposed meeting to discuss alignment on collaborations to pursue action on IARC	yy
643	MONGLY03557240	MONGLY03557241	CLI IARC Strategy	06/23/2016
644	MONGLY03487960	MONGLY03487961	Fwd: Germany outreach	05/25/2016
645	MONGLY02056568	MONGLY02056576	FW: Glyphosate and Medical Toxicologists in Europe	04/22/2016
646	MONGLY03402231	MONGLY03402234	RE: EPA statement?	04/21/2016

647	MONGLY03401522	MONGLY03401526	Email re: French Embassy	04/06/2016
648	MONGLY03324620	MONGLY03324624	RE: Hugh EPA Brlef.docx	02/25/2016
649	MONGLY03859549	MONGLY03859551	RE: Summary of this afternoon's meeting with EPA	02/12/2016
650	MONGLY03379121	MONGLY03379123	FW: Jack Housenger at ARA	02/02/2016
651	MONGLY03878138	MONGLY03878139	RE: atsdr	10/26/2015
652	MONGLY03396443	MONGLY03396444	High Level Goals.docx	10/05/2015
653	MONGLY03402751	MONGLY03402753	JMPR Action Plan	09/22/2015
654	MONGLY03398169	MONGLY03398171	RE: Glyphosate regional issues support - 2016	08/28/2015
655	MONGLY03315544	MONGLY03315545	RE: Lego & Shell end 64-Year Branding & Retail Partnership	08/24/2015
656	MONGLY03334607	MONGLY03334611	RE: NEJM article	08/19/2015
657	MONGLY03389601	MONGLY03389602	RE: Scotts Glyphosate Visit	08/10/2015
658	MONGLY03500775	MONGLY03500776	Proposal for Glyphosate Expert Panel Review Glyphosate Strategy Team Meeting	06/18/2015
659	MONGLY03550020	MONGLY03550024	Support of Glyphosate Re-registration Campaign UPDATED	05/27/2015
660			[Website screencaps]	00/00/0000
661	MONGLY14441101	MONGLY14441108	Notes [regarding Hakluyt proposal]	07/05/2018
662	MONGLY07587243	MONGLY07587248	Hakluyt Monsanto Prop 65 Proposal	09/29/2017
663	MONGLY00893439	MONGLY00893443	Report by Stout and Ruecker	0/0/1990
664	MONGLY00893433	MONGLY00893436	Report by Knezivich and Hogan	0/0/1983
665	MONGLY00893430	MONGLY00893432	Report by Hogan and Lankas	0/0/1981
666	MONGLY02413658	MONGLY02413664	Genotoxic Potential of Glyphosate Formulations: Mode-of-Action Investigations	01/16/2008
667	MONGLY00893429	MONGLY00893429	E-mail re JMPR Summaries	04/29/2003
668	MONGLY00905604	MONGLY00905606	REVISED MARK MARTENS FELLOW NOMINATION LETTER	11/13/2001
669	MONGLY00223570	MONGLY00223581	Correspondence between Monsanto and EPA re: Roundup advertising.	07/26/1988
670	MONGLY04287322	MONGLY04287360	handwritten notes and EPA ltr regarding Enlist Duo and Reporting	10/01/2015

671	MONGLY04287361-R	MONGLY04287397-R	handwritten notes re EPA	05/00/2015
672	MONGLY04287398	MONGLY04287412	Daniel Jenkins handwritten notes	05/00/2013
673	MONGLY00500665	MONGLY00500667	March 2015 incident from Missouri Region Poison Control	03/00/2015
674	MONGLY01320475	MONGLY01320478	Occupational Exposure of Forest Workers to Glyphosate During Brush Saw Spraying Work, Jauhianien, et al, Am. Ind. Hyg. Assoc. J., February 1991	02/00/1991
675	MONGLY02314040	MONGLY02314079	Exponent "Design of Epidemiologic Studies for Human Health Risk Assessment of Pesticide Exposures" Prepared for CropLifeAmerica	01/242016
676	MONGLY02314040		Exponent "Design of Epidemiologic Studies for Human Health Risk Assessment of Pesticide Exposures" Prepared for CropLifeAmerica	01/24/2016
677	MONGLY01526082	MONGLY01526119	January 2009 ROUNDUP MON2139 Tier 3 assessment	01/00/2009
678	MONGLY00430366	MONGLY00430374	Defense Against Dermal Exposures in only skin deep: Significantly increased penetration through slightly damaged skin, Nielsen, Arch Dermatol Res (2007)	00/00/2007
679	MONGLY02908721	MONGLY02909258	MON 78294 :An Applicator Exposure Study Conducted in Spain (Autumn 2005) Using Biomonitoring	00/00/2007
680	MONGLY01204377	MONGLY01204378	E-mail chain re reviewers of Eriksson (2008) and Hardell & Eriksson (1999) (MONGLY01204377 - MONGLY01204378)	00/00/1999
681	MONGLY01320467	MONGLY01320474	Confier Seedling Nursey Worker Exposure to	00/00/1992

			Glyphosate; Lavy, et al, Arch. Environ. Contam. Toxcol 22, 6-13 (1992)	
682	MONGLY02142251	MONGLY02142265	1983 Maibach study	00/00/1983
683	MONGLY01307724	MONGLY01307768	WHY THE GLYPHOSATE MOUSE ONCOGENICITY STUDY IS NOT REQUIRED - Monsanto refuses to do study (MONGLY01307724)	00/00/0000
684	MONGLY01742771	MONGLY01742775	Mon 03050 Safety Data Sheet	09/30/1998
685	MONGLY01075506	MONGLY01075544	MON 76473 Summary and hazard assessment	09/05/2017
686	MONGLY07480802	MONGLY07480804	Email attachment, Monsanto Request for Recusal	06/20/2017
687	MONGLY07930351	MONGLY07930353	Email, Re: regarding the unsealed email about ghostwriting	04/04/2017
688	MONGLY07497757	MONGLY07497763	Email, Literature review - negative articles	02/21/2017
689	MONGLY07582173	MONGLY07582173	Email attachment, budget resolution	01/11/2017
690	MONGLY04350032	MONGLY04350037	email re: malignant lymphoma	10/07/2016
691	MONGLY08076980	MONGLY08076981	Email: Sumary of yesterdays meeting between Hugh and EPA administrator McCarthy	09/01/2016
692	MONGLY07579479	MONGLY07579480	Email, interior approps	07/08/2016
693	MONGLY02356274	MONGLY02356278	Email re: Declaration of Interest	07/05/2016
694	MONGLY02356878	MONGLY02356884	5/16/2016 email re Intertek reviewer comments	05/16/2016
695	MONGLY03043005	MONGLY03043007	Email, Glyphosate monsanto meeting notes after team comments	04/06/2016
696	MONGLY01000680	MONGLY01000729	Draft Intertek Manuscript with Heyden edits	02/09/2016
697	MONGLY01251889	MONGLY01251899	Email re: EPA congressional hearing	01/22/2016
698	MONGLY01685794	MONGLY01685806	Internal Memo re Government affairs update	01/01/2016
699	MONGLY05795088	MONGLY05795124	Exposure Estimate refinements	11/11/2015

700	MONGLY01097734	MONGLY01097739	meeting minutes HHRC October 21 2015	10/26/2015
701	MONGLY00901021	MONGLY00901023	Memo listing predicted furture issues including Dioxane and NNG. Also glyphosate in Children's urine	10/23/2015
702	MONGLY00084638	MONGLY00084644	MONSANTO Roundup Lawn & Garden Material Safety Data Sheet	10/15/2015
703	MONGLY02995570	MONGLY02995571	10/13/2015 email re consumer NHL complaint	10/13/2015
704	MONGLY01700591	MONGLY01700592	Surfactant Issue Analysis	10/11/2015
705	MONGLY03316125	MONGLY03316211	EPA, Glyphosate reprt of the Cancer Assessment Review Committee	10/01/2015
706	MONGLY01097607	MONGLY01097608	Email, glyphosate toxicology, David Saltmiras	09/15/2015
707	MONGLY00982099	MONGLY00982107	9/2/2015 email re GLT-specifications/impurities/test items.msg - NNG levels	09/02/2015
708	MONGLY07486006	MONGLY07486009	Email, LTE-NEJM Submitted	09/02/2015
709	MONGLY03934897	MONGLY03934898	Invoice from John Acquavella to Monsanto for his work on the Intertek expert panel	08/31/2015
710	MONGLY01617138	MONGLY01617252	Donna Farmer editing the Chang Meta-analysis	08/25/2015
711	MONGLY05508247	MONGLY05508254	8/20/2015 email re PPE	08/20/2015
712	MONGLY02816607	MONGLY02816609	Email confirming that both Larry Kier and Acquavella are under direct contract with Monsanto	08/13/2015
713	MONGLY01723742	MONGLY01723742	Saltmiras accomplishments	08/04/2015
714	MONGLY03342947	MONGLY03342949	Email from Dan Jenkins re: EPA CARC	07/07/2015
715	MONGLY02060344	MONGLY02060345	Email re ATSDR	06/24/2015
716	MONGLY07084565	MONGLY07084567	Email, Consumer Reports on Health Article	06/16/2015
717	MONGLY01228577	MONGLY01228577 _0010	Powerpoint on IARC	05/11/2015
718	MONGLY00903930	MONGLY00903930 _0013	Powerpoint re: History of glyphosate	05/07/2015
719	MONGLY01979408	MONGLY01979411	Email, IARC Revised	04/09/2015
720	MONGLY01179968	MONGLY01179971	Email re: Mary Manibusan	03/30/2015

721	MONGLY03544701	MONGLY03544706	Email, RE IARC 2A rating with updated supporting materials	03/13/2015
722	MONGLY02063611	MONGLY02063618	Email between Eric Sachs and Henry Miller	03/12/2015
723	MONGLY02015108	MONGLY02015109	Email, FW Business related QA	03/11/2015
724	MONGLY01131945	MONGLY01132028	2/20/2015 CST 2 EPA-HQ-OPP-2009-0131-0004.pdf	02/20/2015
725	MONGLY03046445	MONGLY03046448	11/20/2014 Email re IARC	11/20/2014
726	MONGLY01275627	MONGLY01275649	Spanish Operator Exposure	10/23/2014
727	MONGLY01207339	MONGLY01207342	Email re: IARC	09/18/2014
728	MONGLY02817577	MONGLY02817584	Monsanto response to the concern of the Slovenian authorities on the composition of the Plant Protection Product MON 79376 (360 g/l glyphosate) and the surfactant MON 59117 (CAS n6847896-6)	05/13/2014
729	MONGLY00556464	MONGLY00556465	Letter to Seralini from Wally Hayes	11/19/2013
730	MONGLY01526625	MONGLY01526647	Absorption, Distribution and Excretion Study Summaries	11/08/2013
731	MONGLY01051709	MONGLY01051714	Email re: Indonesia formaldehyde	10/22/2013
732	MONGLY00980032	MONGLY00980035	Email re: TAC consortium	09/27/2013
733	MONGLY04234807	MONGLY04234808	June 5, 2013 emails between Joy Honegger, Erin Ahlers, and others MONGLY04234807 - 808	06/05/2013
734	MONGLY01947702	MONGLY01947704	Email attachment, Phase 1 high level summary`	04/18/2013
735	MONGLY03829270	MONGLY03829272	Email re: Prop 65	04/09/2013
736	MONGLY01554012	MONGLY01554014	Mahyco BGII RRF Cotton Dissier	03/24/2013
737	MONGLY01159775	MONGLY01159778	Monsanto Email re: Formulation testing	03/06/2013
738	MONGLY01037818	MONGLY01037854	Transcript re: Tac Studies	12/20/2012
739	MONGLY00978886	MONGLY00978891	Email re: Seralini	10/10/2012
740	MONGLY04287547	MONGLY04287574	Dan Jenkins handwritten notes June 2012-10/1/2012	10/01/2012
741	MONGLY00936725	MONGLY00936728	Monsanto email re: Seralini letter	09/28/2012
742	MONGLY01096619	MONGLY01096622	Email, re: Seralini Manuscript	09/20/2012

743	MONGLY00971543	MONGLY00971543	Email re: Wallace Hayes Consulting	08/13/2012
744	MONGLY02246760	MONGLY02246766	11/8/2011 MON 2139 MSDS	11/08/2011
745	MONGLY00963541	MONGLY00963546	Email Exchanges re Glyphosate Publications in support of A1R	09/16/2011
746	MONGLY04107778	MONGLY04107779	8/23/2011 email from Christophe Gustin regarding Dermal penetration study argumentation for applicability to MON79991 - Dermal Penetration value of 3% does not pass UKPOEM risk assessment	08/23/2011
747	MONGLY04116974	MONGLY04116976	Email, RE: EPA Meeting logistics	06/13/2011
748	MONGLY03133015	MONGLY03133019	4/15/2011 MON 59112 MSDS	04/15/2011
749	MONGLY00407266	MONGLY00407272	Baseline determination in social, health and genetic areas in communities affected by glyphosate aerial spraying on the northeastern Ecuadorian border	03/08/2011
750	MONGLY01160109	MONGLY01160115	1/31/2011 email from Kevan Richardson regarding Glyphosate EU Re-Reg	01/31/2011
751	MONGLY06731019	MONGLY06731022	1/16/2011 Email from Richard Garnet regarding Glyphosate Repeat Dose ADME	01/16/2011
752	MONGLY01155974	MONGLY01155979	Email re: Tseting on Formulations	12/14/2010
753	MONGLY02721133	MONGLY02721133 _0018	Powerpoint on POEA	11/01/2010
754	MONGLY00906974	MONGLY00906984	Davids Comments SERA Glyphosate Review	08/26/2010
755	MONGLY02802215	MONGLY02802220	Absorption levels and 6/29/2010 Meeting Minutes with Spanish regulators	06/29/2010
756	MONGLY01041300	MONGLY01041301	Email re: 1, 4-dioxane	06/11/2010
757	MONGLY03909609	MONGLY03909611	Email re: NNG	05/04/2010
758	MONGLY02159396	MONGLY02159399	10/19/2009 email from David Saltmiras re: Manuscript: Toxicokinetics of Glyphosate & AMPA in rats	10/19/2009

759	MONGLY00909017	MONGLY00909018	Email re :AHS section for glyphosate registration comments	09/15/2009
760	MONGLY02804480	MONGLY02804482	9/15/2009 email from Christophe Gustin regarding nude mouse model	09/15/2009
761	MONGLY02804480	MONGLY02804482	9/15/2009 email re DTL summaries	09/15/2009
762	MONGLY00984228	MONGLY00984230	Email re: glyphosate use survey	08/21/2009
763	MONGLY00302620	MONGLY00302631	Biomonitoring of Genotoxic Risk in Agricultural Workers from Five Columbian Regions: Association to Occupational Exposure to Glyphosate, Bolognesi, Journal of Toxicology and Envoron mental Health	08/13/2009
764	MONGLY00874417	MONGLY00874424	Email re:RE: Draft Glyphosate paper	06/08/2009
765	MONGLY01275932	MONGLY01276025	POEA - Germany	04/03/2009
766	MONGLY06454419	MONGLY06454421	UK requirement for respirator in windy conditions	02/23/2009
767	MONGLY00302676	MONGLY00302685	The Usual Suspects – Influence of Physicochemical Properties on Lag Time, Skin Deposition, and Percutaneous Penetration of Nine Model Compounds	02/20/2009
768	MONGLY01061857	MONGLY01061859	Email RE: Glyphosate Expert Panel follow up meeting	02/19/2009
769	MONGLY00582206	MONGLY00582232	2/2/2009 Glyphosate overview	02/02/2009
770	MONGLY00987424	MONGLY00987425	Email re seralini	01/07/2009
771	MONGLY01012203	MONGLY01012206	Email re: RE: tallow amine situation in Germany - tox issues	11/12/2008
772	MONGLY07070096	MONGLY07070099	Summary Histopathology Data for 18 Month Control Study Safepharrn Laboratories Internal Project	07/24/2008
773	MONGLY01182770	MONGLY01182770	PowerPoint regarding EU Advisory Committee	07/15/2008

774	MONGLY02285700	MONGLY02285704	7/4/2008 email from William Graham regarding Modeling of Plasma levels	07/04/2008
775	MONGLY01185826	MONGLY01185827	Donna Farmer editing the Mink, et al epidemiology review and attached draft manuscript	05/14/2008
776	MONGLY02530945	MONGLY02530946	Email re: NNG	04/19/2008
777	MONGLY06878230	MONGLY06878238	11/23/2007 MON 0818 sds	11/23/2007
778	MONGLY00813893	MONGLY00813943	8/6/2007 Correspondence with EPA	08/06/2007
779	MONGLY07617889	MONGLY07617891	7/16/2007 email re gloves	07/16/2007
780	MONGLY08857831	MONGLY08857831	7/16/2007 email re gloves	07/16/2007
781	MONGLY07617896	MONGLY07617897	7/13/2007 Email re gloves	07/13/2007
782	MONGLY01187777	MONGLY01187782	Glyphosate Toxicology Peer Review Meeting Minutes	06/22/2007
783	MONGLY00407261	MONGLY00407265	Evaluation of DNA Damage in an Ecuadorian population exposed to glyphosate	05/01/2007
784	MONGLY01616857	MONGLY01616874	Draft IARC section animals.	03/13/2005
785	MONGLY00324238	MONGLY00324245	Operator Exposure When Applying Amenity Herbicides by All-Terrain Vehicles and Controlled Droplet Applicators; Johnson, et al, Ann Occup. Hyg, pp1-8	12/10/2004
786	MONGLY00666980	MONGLY00666983	Reports on NNG levels	10/05/2004
787	MONGLY00903275	MONGLY00903276	Email re: exposure assessment in AHS	07/26/2004
788	MONGLY06424476	MONGLY06424478	Email from Richard Garnett re: MON 59117 GI tract study - re: absorption of surfactant	07/09/2004
789	MONGLY00896655	MONGLY00896655	Email re: De Roos study	09/02/2003
790	MONGLY06722565	MONGLY06722566	8/14/2003 email from Fabrice Broeckaert regarding K salt of glyphosate by inhalation	08/14/2003
791	MONGLY06722561	MONGLY06722564	8/11/2003 email from Mark Martens regarding K-salt of Glyphosate	08/11/2003
792	MONGLY06403283	MONGLY06403322	Email attachment, Operator expsoure risk assesment	06/19/2003
793	MONGLY06653096	MONGLY06653100	Email re Humectants	05/22/2003

794	MONGLY00360482	MONGLY00360486	In Vitro Perutaneous Absorption of Model Compounds Glyphosate and Malathion from Cotton Fabric into and through Human Skin	05/17/2003
795	MONGLY01851796	MONGLY01851797	Email attaching revised TNO study	04/30/2003
796	MONGLY01851797	MONGLY01851837	Revised TNO study	04/30/2003
797	MONGLY06401072	MONGLY06401075	4/10/2003 email from Richard Garnett regarding Glyphosate penetration through gloves	04/10/2003
798	MONGLY06414231	MONGLY06414232	Email RE: Issues handling for glyphosate	09/23/2002
799	MONGLY00888421	MONGLY00888422	8/21/2002 email from Fabrice Broeckaert re: TNO Draft report - TNO Study	08/21/2002
800	MONGLY00888353	MONGLY00888388	6/14/2002 fax from Johan Van Burgsteden re: Study 4478, Unaudited draft report - TNO Study Report	06/14/2002
801	MONGLY01284534	MONGLY01284570	Glyphosate acid – In Vitro Absorption through Abraded Rabbit Sin using C-glyphosate	04/18/2002
802	MONGLY03737014	MONGLY03737016	4/5/2002 email from Stephen Wratten regarding TNO dermal penetration studies	04/05/2002
803	MONGLY03737014	MONGLY03737016	Apr. 5, 2002 email from Richard Garnett re TNO Dermal Penetration Studies at *1-3	04/05/2002
804	MONGLY03737014	MONGLY03737016	4/5/2002 email from Stephen Wratten regarding TNO dermal penetration studies	04/05/2002
805	MONGLY03738295	MONGLY03738296	4/2/2002 email from William Heydens re: TNO dermal penetration studies: new issues and topics for the conf. call of Tuesday 2, April	04/02/2002
806	MONGLY03738295	MONGLY03738296	4/2/2002 email from William Heydens re: TNO dermal penetration studies: new issues and topics for the conf. call of Tuesday 2, April	04/02/2002

807	MONGLY06513290	MONGLY06513319	4/1/2002 Email re FFES	04/01/2002
808	MONGLY06409924	MONGLY06409927	3/8/2002 Email regarding in Vitro dermal study	03/08/2002
809	MONGLY00905589	MONGLY00905589	Mark Martens achievements	01/03/2002
810	MONGLY06509236	MONGLY06509258	Operator Exposure Assessment	01/01/2002
811	MONGLY06390127	MONGLY06390129	Email re: RE: MON 2139 operator exposure	10/10/2001
812	MONGLY06388557	MONGLY06388558	6/17/2001 email from Richard Garnett regarding droplet sizes for Rup formulations	06/17/2001
813	MONGLY02628575	MONGLY02628576	Email, Question/Info	04/02/2001
814	MONGLY00888235	MONGLY00888235	Email re: San Fransisco Retraction	01/04/2001
815	MONGLY00882353	MONGLY00882355	9/26/2000 email re California DPR website	09/26/2000
816	MONGLY00889984	MONGLY00889987	Monsanto emailre:FYI, Roundup disparagement on organic listservs...	05/26/2000
817	MONGLY03735338	MONGLY03735339	4/25/2000 email from Stephen Wratten re; Glyphosate dermal penetration	04/25/2000
818	MONGLY01745304	MONGLY01745307	Memo re: Ethylene Glycol	01/01/2000
819	MONGLY01832749	MONGLY01832753	email, US Products Database	10/21/1999
820	MONGLY01593792	MONGLY01593792 _0003	08/31/1999 Donna Farmer PowerPoint Presentation	08/31/1999
821	MONGLY02598951	MONGLY02598958	Monsanto internal memo re: Williams Manuscript	10/21/1998
822	MONGLY00052410	MONGLY00052413	12/19/1997 Glyphosate msdr	12/19/1997
823	MONGLY02719133	MONGLY02719135	Email regarding Glyphosate Chemotherapy Patent	03/05/1997
824	MONGLY00158466	MONGLY00158508	MONGLY00158466 - MONGLY00158508	07/22/1996
825	MONGLY00788970	MONGLY00788975	5/26/1994 Correspondence with EPA	05/26/1994
826	MONGLY01664620	MONGLY01664637	Mary O'Brien, Roundup, Vision, POEA and 1, 4 Dioxane: Why Full Formlations are the Problem , Journal of Pesticide Reform	02/02/1992
827	MONGLY01287148	MONGLY01287192	Monsanto meeting with EPA again requesting that the Mouse Study not be repeated.	11/10/1988

828	MONGLY00241308	MONGLY00241333	File entitled Gly: Roundup Worker Safety,	05/13/1988
829	MONGLY01297434	MONGLY01297435	Monsanto correspondence to EPA re: Waiver of protective gear requirement	11/02/1987
830	MONGLY01297180	MONGLY01297358	EPA "Guidance for the Reregistration of Pesticide Products Containing Glyphosate as the Active Ingredient."	06/01/1986
831	MONGLY04268857	MONGLY04268859	Invoice from Marvin Kushner	02/15/1986
832	MONGLY04268860	MONGLY04268862	Invoices from Monsanto experts at SAP meeting	02/14/1986
833	MONGLY00233235	MONGLY00233391	Monsanto's SAP Submission	02/11/1986
834	MONGLY04269047	MONGLY04269048	Monsanto Memo re: glyphosate and DEA	04/10/1985
835	MONGLY04269117	MONGLY04269120	Memo re: EPA assessment of Oncogenicity	03/04/1985
836	MONGLY04272196	MONGLY04272232	2-year carcinogenicity study in mice fed NNG.	12/26/1984
837	MONGLY00223061	MONGLY00223061	Acknowledgement of receipt - mouse oncogenicity study on glyphosate	12/07/1983
838	MONGLY04268319	MONGLY04269324	11/1/1983 report re: Glyphosate Plasma and Bone Marrow Levels Following Intraperitoneal Injection	11/01/1983
839	MONGLY04271635	MONGLY04271639	Internal Monsanto Memo re: NNG	08/24/1983
840	MONGLY01330781	MONGLY01330783	4/11/1983 report re: Elimination and Dermal Penetration in Monkey's, MA-081-349	04/11/1983
841	MONGLY04275275	MONGLY04275302	4/11/1983 Maibach report	04/11/1983
842	MONGLY00223094	MONGLY00223097	Correspondence between Monsanto and EPA re Hamster Oncogenicity study (within MONGLY00223052-MONGLY00223262)	08/11/1982
843	MONGLY04269195	MONGLY04269196	Memo re: Rodent studies compliance with GLP	03/25/1981
844	MONGLY06293737	MONGLY06293737	The UK Predictive Operator Expsoure Model (POEM)	01/01/1980

845	MONGLY04272266	MONGLY04272308	Two-year mouse study on NNG terminated	07/16/1979
846	MONGLY00223244	MONGLY00223244	Memo re IBT (within MONGLY00223052-MONGLY00223262)	10/01/1977
847	MONGLY00223252	MONGLY00223255	EPA Memo Re; Nitrosamine Generators (within MONGLY00223052-MONGLY00223262)	07/01/1977
848	MONGLY06253165	MONGLY06253182	CATALOG OF PRODUCED METADATA DETAIL [for above]	00/00/0000
849			Environmental Protection Agency, Glyphosate First Toxicity Report. 1973.	1/1/1973
850		`	Environmental Protection Agency, Glyphosate in or on corn, cotton, soybeans and what. Evaluation of analytical methods and residue data., 1974.	1/1/1974
851			Roundup Post emergence Herbicide Label	3/13/1974
852			Street, Robert W. and Monsanto, Roundup Herbicide EPA Reg. No. 524-308,	9/1/1974
853			Environmental Protection Agency, Glyphosate TOX data on which tolerances are based. 1977.	1/1/1977
854			Roundup Herbicide Label	2/21/1978
855	MONGLY00223224	MONGLY00223224	EPA memo re protective gear (within MONGLY00223052-MONGLY00223262)	06/28/1978
856	MONGLY00223177	MONGLY00223177	EPA memo re: Hamster Oncogenicity Study (within MONGLY00223052-MONGLY00223262)	08/30/1978
857			Environmental Protection Agency, Glyphosate; petition proposing the establishment of a tolerance for residues of glyphosate and its metabolite in the crop grouping stone fruit at 0.2 ppm. 1979.	1/1/1979

858			EPA. (1980). Memo Re: EPA Reg. #524-308, Glyphosate; Submission of rat teratology, rabbit teratology, dominant lethal mutagenicity assay in mice. Office of Toxic Substances(Agency).	1/1/1980
859	MONGLY01309977	MONGLY01309979	EPA memo re: NNG	06/26/1980
860	MONGLY00223146	MONGLY00223146	EPA memo re: 1, 4 dioxane. (within MONGLY00223052-MONGLY00223262)	12/04/1980
861	MONGLY00223143	MONGLY00223144	EPA mem re: 1, 4 dioxane	03/18/1981
862			Environmental Protection Agency, Memo: Lifetime Feeding Study of Rats with Glyphosate. 1982.	1/1/1982
863	MONGLY00223108	MONGLY00223109	EPA Memo re: 2-year oncogenicity study of glyphosate in dogs	07/27/1982
864			Environmental Protection Agency, Letter from William L. Burnam to Ed Johnson re: glyphosate oncogenecity. 1983.	1/1/1983
865			Environmental Protection Agency, Memo: Letter from Louis Kasza to William Brunam, Subject: Evaluation of the Presence of Neoplasms in the Thyroid Gland of Rats Treated with Glyphosate. 1983.	1/1/1983
866			Environmental Protection Agency, Memo: Glyphosate (Roundup) on Wheat. 1983.	1/1/1983
867			Environmental Protection Agency, Memo: Glyphosae; oncogenicity study in the mouse. 1984.	1/1/1984
868			EPA (1985a). Glyphosate; EPA Reg.#: 524–308; Mouse oncogenicity study. Document No. 004370. Washington (DC): Office of Pesticides and Toxic	1/1/1985

			Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/clearedreviews/reviews/103601/103601-183.pdf, accessed 10 March 2015.	
869			EPA (1985b). EPA Reg.#: 524–308; Roundup; glyphosate; pathology report on additional kidney sections. Document No. 004855. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/clearedreviews/reviews/103601/103601- 206.pdf.	1/1/1985
870			EPA (1985b). EPA Reg.#: 524–308; Roundup; glyphosate; pathology report on additional kidney sections. Document No. 004855. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. At: http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/clearedreviews/reviews/103601/103601- 206.pdf	1/1/1985
871			Sauer, Robert M., Pathology Working Group Report on Glyphosate in CD-1 Mice, PATHCO, Inc., 10 Oct. 1985.	1/1/1985
872			Environmental Protection Agency, Memo: Glyphosate in	1/1/1985

			or on Wheat Grain and Wheat Straw. Proposed Tolerance Increases. 1985.	
873			Environmental Protection Agency, Memo: Glyphosate -- Evalutaion of Kidney Tumors in Male Mice. Chronic Feeding Study., 1985.	1/1/1985
874	MONGLY00235393	MONGLY00235397	EPA Memo: Rejecting Monsanto's statistical approach - Use of historical data in determining the weight of evidence from kidney tumor incidence in Glyphosate two year feeding study	02/26/1985
875	MONGLY04269067	MONGLY04269070	Consensus Review of Glyphosate by EPA classifying it as a Class C oncogen	03/04/1985
876	MONGLY01616599	MONGLY01616603	EPA Memo: Glyphosate Oncogenicity Mouse Study	04/03/1985
877	MONGLY01616599	MONGLY01616603	EPA Glyphosate oncogenic in male mice	04/03/1985
878	MONGLY00235412	MONGLY00235412	EPA Memo: New tumor finding - Analysis of Glyphosate	06/14/1985
879	MONGLY00235488	MONGLY00235497	EPA Memo: Glyphosphate - Evaluation of Kidney Tumors in Male Mice - Chronic Feeding Study- EPA's View of Resectioning Tumor	12/04/1985
880			EPA (1986). Glyphosate; EPA Registration No. 524–308; Roundup; additional histopathological evaluations of kidneys in the chronic feeding study of glyphosate in mice. Document No. 005590. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticide	1/1/1986

			s/ chemical search/chemical/foia/cleared-reviews/	
881			EPA Memo, Glyphosate; EPA Registration No. 524-308; Roundup; Additional Histopathological Evaluations of Kidneys in the Chronic Feeding Study of Glyphosate in Mice, Toxicology Branch/HED. 11 Mar. 1986.	1/1/1986
882			EPA Memo, Glyphosate EPA Reg. 524-308, 2 year chronic feeding/oncogenicity study in rats with technical glyphosate. 1986.	1/1/1986
883			EPA's Guidance for the Reregistration of Pesticide Products Containing Glyphosate (1986)	1/1/1986
884			Proposition 65: Restrictions on Toxic Discharges into Drinking Water; Requirement of Notice of Persons' Exposure to Toxics. Initiative Statute. https://oehha.ca.gov/media/downloads/proposition-65/general-info/prop65ballot1986.pdf	1/1/1986
885			Environmental Protection Agency, Glyphosate Reference Doses (RFDs) for Oral Exposure. 1986.	1/1/1986
886			Environmental Protection Agency, Memo: Glyphosate; EPA Registration No. 524-308; Roundup; Additional Histopathological Evaluations of Kidneys in the Chronic Feeding study of Glyphosate in Mice. 1986.	1/1/1986
887	MONGLY00233243	MONGLY00233391	SAP Announcement	01/17/1986
888	MONGLY01299319	MONGLY01299414	EPA SAP hearing transcript-414	02/11/1986

889			Roundup L&G Label	10/8/1986
890	MONGLY08345345	MONGLY08345355	12/2/1986 California EPA assessment	12/02/1986
891			Roundup L&G RTU Label	9/11/1987
892			Environmental Protection Agency, Memo: Glyphosate in/on Corn- Tolerance Request and "Free Standing Summary". 1988.	1/1/1988
893	MONGLY00223053	MONGLY00223058	EPA Memo: Glyphosate - Monsanto Comments to Glyphosate Guidance Document - re. doing new mouse study	01/05/1988
894	MONGLY00223052	MONGLY00223058	EPA memo re: Monsanto's request to waive Mouse testing requirements	01/15/1988
895	MONGLY00223577	MONGLY00223581	10/29/1988 letter from EPA to Monsanto regarding Glyphosate products request for postponement of additional requirements for protective clothing	10/29/1988
896	MONGLY01307724	MONGLY01307768	EPA memo by Dykstra re: Historical Control Data submitted by Monsanto.	06/09/1989
897	MONGLY01307726	MONGLY01307768	EPA Memo: Glyphosate - Historical Control Data for Mouse Kidney Tumors - Memo re. redoing mouse study	06/19/1989
898	MONGLY00158518	MONGLY00158551	Chronic Study of Glyphosate Adminstered in Feed in Albino Rats	09/26/1990
899			EPA(1991a). Second peer review of glyphosate. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/clearedreviews/	1/1/1991

			reviews/103601/103601-265.pdf	
900			EPA (1991b). Glyphosate; 2-year combined chronic toxicity/carcinogenicity study in Sprague-Dawley rats - List A pesticide for reregistration. Document No. 008390. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/clearedreviews/reviews/103601/103601-263.pdf, see also http://www.epa.gov/pesticides/chemicalsearch/chemical/foia/cleared-reviews/reviews/103601/103601-268.pdf	1/1/1991
901			EPA (1991c). Peer review on glyphosate. Document No. 008527. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency.	1/1/1991
902			EPA (1991d). Glyphosate – EPA registration No. 524–308 – 2-year chronic feeding/oncogenicity study in rats with technical glyphosate. Document No. 008897. Washington (DC): Office of Pesticides and Toxic Substances, United States Environmental Protection Agency. Available from: http://www.epa.gov/pesticide	1/1/1991

			s/chemicalsearch/chemical/foia/clearedreviews/reviews/103601/103601-268.pdf	
903			Preamble to the IARC Monographs, 1991	1/1/1991
904	MONGLY01287106	MONGLY01287147	EPA memo re: review of repeat Rat study	05/14/1991
905			Roundup Super Concentrate Grass & Weed Killer Label	5/16/1991
906	MONGLY01286850	MONGLY01286870	Untitled - EPA Review of Rat Chronic	06/08/1991
907	MONGLY03204444	MONGLY03204463	EPA peer-review of glyphosate	10/30/1991
908			RT Herbicide (Shuttle 100) Label	6/24/1992
909			U.S. EPA, "Registration eligibility decision-facts: Glyphosate," 1993 United States Environmental Protection Agency, Prevention, Pesticides and Toxic Substances (7508W), EPA-738-F-93-011.	1/1/1993
910			Environmental Protection Agency, Glyphosate R.E.D., 1993.	1/1/1993
911			Environmental Protection Agency, Memo: The Metabolism Committee Meetings for Glyphosate Held on March 17, 1994. 1994.	1/1/1994
912	MONGLY00233965	MONGLY00234220	Reregistration Eligibility Decision (RED) Glyphosate	02/16/1994
913			Roundup L&G RTU Grass & Weed Killer Label	10/10/1994
914			Environmental Protection Agency, Memo: Glyphosate in/on Genetically-engineered Soybeans. Evaluation of Residue Data and Analytical Methodology. 1995.	1/1/1995
915	MONGLY00235097	MONGLY00235537	Glyphosate Import Tolerance 1984-1995	07/20/1995

916	MONGLY01030362	MONGLY01030367	MONSANTO MATERIAL SAFETY DATA	10/01/1995
917			Oregon OSHA Technical Manual (circa 1996) unless otherwise stated within the "Chapter Revision Information ", located at the beginning of each chapter.	1/1/1996
918			Agricultural Health Study Enrollment Commercial Applicator Questionnaire	8/31/1996
919			Agricultural Health Study Enrollment Private Applicator Questionnaire	8/31/1996
920			Agricultural Health Study Enrollment Questionnaire-Private and Commercial Applicators	8/31/1996
921			Agricultural Health Study Take Home Applicator Questionnaire	8/31/1996
922			Environmental Protection Agency, Glyphosate ; Pesticide Tolerances. 1997.	1/1/1997
923			Roundup Export Herbicide Label	7/9/1997
924			Environmental Protection Agency, Memo: Glyphosate-Report of the FQPA Safety Factor Committee. 1998.	1/1/1998
925			Roundup UltraDry Label	5/21/1999
926			Lymphoma incidence patterns by WHO SUbtype in the United States, 1992-2001 Lindsay. M. Morton. From the Division of Cancer Epidemiology and Genetics, National Cancer Institute, National Institutes of Health (NIH), Department of Health and Human Services (DHHS), Rockville, MD; and Department of Pathology and Microbiology, University of	1/1/2001

			Nebraska Medical Center, Omaha.	
927			Monsanto, Monsanto Edits to Gustin et al, 2001 Glyphosate Toxicology Paper, Editor^Editors. 2001.	1/1/2001
928			Roundup Concetrate Labels	8/2/2001
929			Roundup SuperConcentrate Labels	8/2/2001
930			Roundup Ready-to-use labels	8/2/2001
931			DEFRA UK Amateur use study 2002 available at http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=9499#Description	1/1/2002
932			Trainor, Risk assessment for acute toxicity from sheep ectoparasite treatments, including organophosphates (OPs) used in plunge dipping, 2002 available at http://www.hse.gov.uk/research/hsl_pdf/2002/hsl02-26.pdf	1/1/2002
933			Roundup QuikPro Label	2/26/2002
934			Roundup Ready-To-Use Poison Ivy & Tough Brush Killer Label	9/13/2002
935			OECD, "Guidance document for the conduct of skin absorption studies," 2004a, Paris. 28, pg.1-31.	1/1/2004
936			Hartzler, B. Preserving the value of glyphosate. 2004; Available from: http://extension.agron.iastate.edu/weeds/mgmt/2004/preserving.shtml.	1/1/2004
937			Hartzler, B., et al. Preserving the Value of Glyphosate. 2004.	1/1/2004
938			Roundup RTU Poison IVy & Tough Brush Killer Plus Label	9/10/2004

939			Roundup Concentrate Poison Ivy & Tough Brush Killer Plus Label	9/21/2004
940			EPA's Guidelines for Carcinogen Risk Assessment	3/1/2005
941			EPA, Memo, Application of New Cancer Guidelines, available at https://www.epa.gov/sites/production/files/2018-03/documents/osa_cancer_guidelines_applic_memo-mar2005.pdf	3/29/2005
942			Ghost Writing Intiated by Commercial Companies: The World Association of Medical Editors	4/13/2005
943			EPA's Memorandum About Implementation of the Cancer Guidelines and Accompanying Supplemental Guidance - Science Policy Council Cancer Guidelines Implementation Workgroup Communication I: Application of the Mode of Action Framework in Mutagenicity Determinations, available at https://www.epa.gov/sites/production/files/2015-01/documents/cgiwgcommunication_i.pdf	10/4/2005
944			JMPR (2006). Glyphosate. In: Joint FAO/WHO Meeting on Pesticide Residues. Pesticide residues in food – 2004: toxicological evaluations. Report No. WHO/PCS/06.1. Geneva: World Health Organization; pp. 95–169. Available from: http://whqlibdoc.who.int/publications/2006/9241665203_eng.pdf?ua=1	1/1/2006

945			Hartzler, B., et al., Understanding Glyphosate To Increase Performance, Editor^Editors. 2006, Purdue Extension. p. 12.	1/1/2006
946			Preamble to the IARC Monographs, amended January 2006	1/1/2006
947			Complaint in Bowman v. Monsanto	1/1/2006
948			Memorandum: Science Policy Council Cancer Guidelines Implementation Workgroup Communication II: Performing Risk Assessments that include Carcinogens Described in the Supplemental Guidance as having a Mutagenic Mode of Action, available at https://www.epa.gov/sites/production/files/2015-01/documents/cgiwg-communication_ii.pdf	6/14/2006
949			Centers for Disease Control and Prevention. Principles of Epidemiology in Public Health Practice, Third Edition. An Introduction to Applied Epidemiology and Biostatistics. Available from: https://www.cdc.gov/ophss/csels/dsepd/ss1978/lesson1/section7.html	10/1/2006
950			Monsanto, Roundup Ultimate Label - UK, Editor^Editors. 2007: United Kingdom.	1/1/2007
951			Boerboom, C. and M.O. (eds). National Glyphosate Stewardship Forum II: A Call to Action. 2007.	1/1/2007
952			OEHHA. Mechanisms for Listing and Delisting Chemicals Under Proposition 65. June 2008.	1/1/2008

			https://oehha.ca.gov/media/downloads/crnr/flowspack051007.pdf; https://oehha.ca.gov/proposition-65/how-chemicals-are-added-proposition-65-list.	
953			Environmental Protection Agency, Letter to Monsanto Re: Label Approval for Roundup Weed & Grass Killer Super Concentrate 2008.	1/1/2008
954			Federal Register, Glyphosate, Tolerance for residue., 40 CFR Part 180 § 180.364 Editor^Editors. 2008. p. 73592.	1/1/2008
955			Goldman Sachs, Company Update: Monsanto Co. (MON), Editor^Editors. 2008.	1/1/2008
956			Monsanto, Monsanto Biotechnology Trait Acreage: Fiscal Years 1996-2008, Editor^Editors. 2008.	1/1/2008
957			Center for Food Safety, Genetically Modified (GM) Crops and Pesticide Use Editor^Editors. 2009.	1/1/2009
958			Environmental Protection Agency, Glyphosate Summary Document Registration Review: Initial Docket. 2009.	1/1/2009
959			Iowa State University, Glyphosate Stewardship, Editor^Editors. 2009.	1/1/2009
960			Monsanto, Monsanto Biotechnology Trait Acreage: Fiscal Years 1996-2009F, Editor^Editors.	1/1/2009
961			Monsanto, Roundup Harvest Management Guide, Editor^Editors. 2009: US.	1/1/2009
962			OECD, Combined Chronic Toxicity\Carcinogenicity Studies, OECD Guidelines for	1/1/2009

			Testing of Chemicals, No. 453, OECD, Editor. 2009: Paris.	
963			OECD, Carcinogenicity Studies, OECD Guideline for the Testing of Chemicals, No. 451, OECD, Editor. 2009: Paris.	1/1/2009
964			Roundup Weed & Grass Killer Concentrate Plus Label	1/1/2009
965			Roundup RTU Ext Control Weed & Grass Killer Plus Weed Preventer II Label	3/26/2009
966			Huber, D.M., Ag Chemical and Crop Nutrient Interactions – Current Update, Editor^Editors. 2010, Fluid Fertilizer Foundation: Scottsdale, AZ.	1/1/2010
967			Monsanto, Roundup ProMax Editor^Editors. 2010: US.	1/1/2010
968			Monsanto, Ranger Pro Label, Editor^Editors. 2010: US.	1/1/2010
969			Monsanto, Roundup Pro Concentrate Label, Editor^Editors. 2010: USA.	1/1/2010
970			Monsanto, Roundup Ultra Label, Editor^Editors. 2010: US.	1/1/2010
971			Monsanto, RT3 Label, Editor^Editors. 2010: US.	1/1/2010
972			Monsanto International, The agronomic benefits of glyphosate in Europe, Editor^Editors. 2010, Monsanto International	1/1/2010
973			Complaint in Walsch v. BASF, et al.	1/1/2010
974			Cheminova, Glyfos® Classic 450 Label, Editor^Editors.: Australia.	1/27/2010
975			Monsanto Europe. p. 1-82.	2/1/2010
976			Roundup Weed & Grass Killer Sure Shot Foam Label	3/26/2010

977			Roundup Weed & Grass Killer Super Concentrate Label	9/20/2010
978	MONGLY00029013	MONLGY00029021	Monsanto Company, Lawn & Garden Products Safety Data Sheet Commercial Product V. 1.0	12/15/2010
979			U.S. EPA, Exposures Factors Handbook: Chapter 8 - Body Weight Studies," 2011, U.S. Environmental Protection Agency.	1/1/2011
980			U.S. EPA, "Recommended use of body weight 3/4 as the default method in derivation of the oral reference dose," 2011, (EPA/100/RII/0001), Office of the Science Advisor, Risk Assessment Forum, US Environmental Protection Agency, Washington, DC.	1/1/2011
981			Huber, D.M., Soil Life and Glyphosate Editor^Editors. 2011, Wisconsin Dells, WI: Grassworks Conference.	1/1/2011
982			Huber, D.M., Letter to USDA Secretary re: Plant Pathogen in Roundup Ready Soybean and Corn, Editor^Editors. 2011. p. 39-40.	1/1/2011
983			Reference Manual on Scientific Evidence, Third Edition, Committee on Science, Technology, and Law Policy and Global Affairs, FEDERAL JUDICIAL CENTER The National Academies Press.	1/11/2011
984			Center for Food Safety, Exposure to Herbicide Residues and Herbicide---Resistant Crops, Editor^Editors. 2012.	1/1/2012
985			Charles, D. Why Monsanto Thought Weeds Would Never	1/1/2012

			Defeat Roundup. 2012; Available from: https://www.npr.org/sections/thesalt/2012/03/11/148290731/why-monsanto-thought-weeds-would-never-defeat-roundup.	
986			Food and Drug Administration, Pesticide Monitoring Program Fiscal Year 2012 Pesticide Report. 2012.	1/1/2012
987			Food Safety Commission of Japan, Minutes of the 23rd Meeting, Assessment Subcommittee IV, Pesticides Expert Committe. 2012.	1/1/2012
988			Harvest Public Media Roundup resistance leading to more chemicals , study finds. Harvest Public Media, 2012; Available from: https://info.umkc.edu/harvestpublicmediaarchive/2012/10/11/roundup-resistance-leading-to-more-chemicals-study-finds/.	1/1/2012
989			Monsanto, Farmers Continue To Take Proactive Approach for Controlling Tough Weeds With Roundup Ready Plus Weed Management Solutions, Editor^Editors. 2012.	1/1/2012
990			Monsanto, Roundup Preharvest Staging Guide, Editor^Editors. 2012: US.	1/1/2012
991			Roundup Weed & Grass Super Concentrate Label	1/1/2012
992			Roundup Weed & Grass Killer Super Concentrate Label	1/1/2012
993			Roundup Weed & Grass Super Concentrate Label	1/1/2012
994			CCM, Glyphosate China Monthly Report, Editor^Editors. 2013.	1/1/2013

995			European Food Safety Authority, Glyphosate: Evaluation of peer-reviewed literature regarding ecotoxicity. 2013.	1/1/2013
996			European Food Safety Authority, Renewal Assessment Report: Glyphosate Toxicology and Metabolism. 2013.	1/1/2013
997			European Food Safety Authority, Renewal Assessment Report: Glyphosate Residue Data. 2013.	1/1/2013
998			European Food Safety Authority, Renewal Assessment Report: Glyphosate Ecotoxicology. 2013.	1/1/2013
999			Friends of the Earth Europe, Human contamination by glyphosate, Editor^Editors. 2013: Brussels, Belgium.	1/1/2013
1000			Glyphosate Task Force, Clarification of Pre-harvest uses of glyphosate The advantages, best practices and residue monitoring, Editor^Editors. 2013, Industry Task Force. p. 1-12.	1/1/2013
1001			Legleiter, T.R. and B. Johnson, Corn and Soybean Herbicide Chart, Editor^Editors. 2013, Purdue University Extension.	1/1/2013
1002			United States Department of Agriculture, Questions and Answers: USDA Investigating Detection of Positive Genetically Engineered (GE) Glyphosate - Resistant Wheat in Oregon. 2013.	1/1/2013
1003			COPE Ethical Guidelines for Peer Reviewers	3/1/2013

1004			[Letter from Marion Copley to Jess Rowland]	3/4/2013
1005			Roundup Concentrate Weed & Grass Killer Plus FastAct Select Label	3/4/2013
1006			WHO International Classification of Disease, Version 9.	6/18/2013
1007			Acquavella - ISPE Statement on American Society of Clinical Oncology's new policy for relationships with companies	11/21/2013
1008			OPERATOR EXPOSURE GUIDANCE FOR AMATEUR (HOME GARDEN) PESTICIDES, available at http://www.hse.gov.uk/pesticides/topics/pesticide-approvals/pesticides-registration/data-requirements-handbook/operator-exposure.htm	1/1/2014
1009			Guidance on the assessment of exposure of operators, workers, residents and bystanders in risk assessment for plant protection products2014	1/1/2014
1010			Environmental Protection Agency, Technical Factsheet on: Glyphosate. 2014.	1/1/2014
1011			Honeycutt, Z. and H. Rowlands, Glyphosate Testing Report : Findings in American Mothers' Breast Milk , Urine and Water Editor^Editors. 2014, Moms Across America	1/1/2014
1012			Monsanto, Roundup Provantage Label - UK, Editor^Editors. 2014: United Kingdom.	1/1/2014
1013			Monsanto, Roundup Ready Flex Cotton Weed	1/1/2014

			Management Guide (Australia), Editor^Editors. 2014: Australia.	
1014			Monsanto, Roundup Ready Plus: 2015 Weed Management Recommendations and Incentives Midsouth and Southeast, Editor^Editors. 2014: US.	1/1/2014
1015			Monsanto, Roundup Ready Plus 2015 Soybean and Corn Weed Management Recommendations and Incentives: Plains, Midwest, Northeast, Editor^Editors. 2014: US.	1/1/2014
1016			Monsanto, Roundup Ready Plus 2015 Weed Management Recommendations and Incentives: Southwest, Editor^Editors. 2014: US.	1/1/2014
1017			United States Department of Agriculture, Agricultural Resource Management Survey: U.S. Soybean Industry. 2014.	1/1/2014
1018			[Washington Post website screencap about Marion Pamely Copley]	1/21/2014
1019			IARC (2015). International Agency for Research on Cancer. Monograph on Glyphosate. Volume 112	1/1/2015
1020			Open letter from Portier: Review of Gyphosate by EFSA and BfR (2015)	1/1/2015
1021			Cal EPA, Office of Environmental Health Hazard Assessment. Notice of Intent to List Chemicals by the Labor Code Mechanism: Tetrachlorvinphos, Parathion, Malathion, and Glyphosate. California Regulatory Notice	1/1/2015

			Register (Register 2015, No. 36-Z September 4, 2015. https://oehha.ca.gov/proposition-65/crnr/notice-intent-list tetrachlorvinphos-parathion-malathionglyphosate	
1022			NPIC General Fact Sheet on Glyphosate http://npic.orst.edu/factsheets/archive/glyphotech.html http://psep.cce.comelLedu/facts-slides-self/facts/gen-peapp-adjuvants.aspx https://ntp.niehs.nih.gov /pubhealth/roc/criteria/index.htm I	1/1/2015
1023			European Food Safety Authority, Statement of the EFSA on the Request for the evaluation of the toxicological assessment of the co-formulant POE-tallowamine. EFSA Journal, 2015. 13(11).	1/1/2015
1024			Christopher Portier et al., Open letter to Commissioner Health & Food Safety, European Commision Re: Review of the Carcinogenicity of Glyphosate by EFSA and BfR. 2015.	1/1/2015
1025			Environmental Protection Agency, Email Chain With EPA and Monsanto Staff Discussing IARC Cancer Determination for Glyphosate. 2015.	1/1/2015
1026			Environmental Protection Agency, Memo: Review of the Office of Pesticide Programs (OPP) draft glyphosate risk assessment and the Cancer Assessment Review Committee (CARe) final report on the carcinogenic potential of glyphosate. 2015.	1/1/2015

1027			Environmental Protection Agency, Memo: Updated Screening Level Usage Analysis (SLUA) Report for Glyphosate Case PC #s(103601, 103604, 103607, 103608, 103613, and 417300). 2015.	1/1/2015
1028			Environmental Protection Agency, Glyphosate: Comparison Of Conclusions By IARC, EFSA, And EPA/OPP. 2015.	1/1/2015
1029			International Agency for Research on Cancer, Press Release IARC Meeting Summary Re: IARC Monographs Volume 112. 2015.	1/1/2015
1030			Kremer, B., Glyphosate and Environmental Biology, Editor^Editors. 2015.	1/1/2015
1031			Monsanto, Roundup Harvest Management Timing Guide - UK, Editor^Editors. 2015: United Kingdom.	1/1/2015
1032			Monsanto, Roundup Proactive Label - UK, Editor^Editors. 2015: United Kingdom.	1/1/2015
1033			United States Department of Agriculture, Monsanto Company Petition (13-290-01p) for Determination of Nonregulated Status of Corn Rootworm-Protected and Glyphosate-Tolerant MON 87411 Maize: Draft Environmental Assessment. 2015.	1/1/2015
1034			van Zwanenberg, P. Chemical reactions : glyphosate and the politics of chemical safety. The Guardian, 2015	1/1/2015
1035			EFSA. (2015). Conclusion on the peer review of the	1/1/2015

			pesticide risk assessment of the active substance glyphosate. EFSA Journal, 13(11). doi:10.2903/j.efsa.2015.4302.	
1036			Monograph 112 LIST OF PARTICIPANTS, available at https://monographs.iarc.fr/wp-content/uploads/2018/06/mono112-F03.pdf	1/1/2015
1037			Roundup Weed & Grass Killer Concentrate Plus	1/1/2015
1038			Roundup® Safety Data Sheet	2/9/2015
1039			[Photo of IARC]	3/3/2015
1040			Roundup Concentrate Ext Control Weed & Grass Killer Plus Weed Preventer	3/13/2015
1041			Cleveland Clinic, Adult Non-Hodgkin's Lymphoma, available at: https://my.clevelandclinic.org/health/diseases/15662-adult-non-hodgkins-lymphoma	7/14/2015
1042			Roundup Max Control 365 Concentrate Label	8/4/2015
1043			Prop. 65 Notice of Intent to List: Tetrachlorvinphos, Parathion, Malathion, Glyphosate	9/4/2015
1044			GLYPHOSATE: Report of the Cancer Assessment Review Committee	10/1/2015
1045			Comments of Samual Cohen re. OEHHA glyphosate Notice of Intent to List https://oehha.ca.gov/media/downloads/proposition-65/crnr/comments/samualcohenglyphosate021616.pdf	10/9/2015
1046	MONGLY00056617	MONGLY00056626	Monsanto Company, Lawn & Garden Products Safety Data Sheet Commercial Product	10/15/2015

1047			Monsanto Company Safety Data Sheet Commercial Product	10/19/2015
1048			Comments of Monsanto re. OEHHA glyphosate Notice of Intent to List available at https://oehha.ca.gov/media/downloads/crnr/comments/monsantoglyphosate.pdf	10/20/2015
1049			Summary of ORD's Comments on OPP glyphosate issue paper (EPA-HQ-20 16-01 0431_00000039)	12/14/2015
1050			Summary of ORD comments on OPP's glyphosate cancer assessment	12/14/2015
1051			NZ Parliament. 2016. Written questions 10151, 10153, 10154. Steffan Browning to the Minister for the Environment. New Zealand Parliament Paremata Aotearoa, Wellington.	1/1/2016
1052			Agri-Pulse, Oh, brother: CropLife questions makeup of glyphosate panel. Agri-Pulse Newsletter, 2016. 12(39): p. 8-10.	1/1/2016
1053			Environmental Protection Agency, Letter to the Miller Firm in Reponse to Touhy Request for the Voluntary Testimony of Jess Rowland 2016.	1/1/2016
1054			European Food Safety Authority, Open letter to Environmental Defense Fund: Review of the Carcinogenicity of Glyphosate by EFSA and BfR. 2016.	1/1/2016
1055			European Parliament, Glyphosate – YES or NO? Re--- Approval of the World's Most	1/1/2016

			Popular Chemical: Draft Meeting Agenda. 2016.	
1056			International Agency for Research on Cancer, Letter from IARC to European Food Safety Authority Re: IARC Monographs on the Evaluation of Carcinogenic Risks to Humans. 2016.	1/1/2016
1057			Main, D. Glyphosate is the most-used agricultural chemical ever. Newsweek, 2016.	1/1/2016
1058			Monsanto, Letter from Monsanto to EPA re: 7/26/16 FIFRA Scientific Advisory Panel Meeting on carcinogenic potential of glyphosate, Editor^Editors. 2016.	1/1/2016
1059			Weisenburger, D., Letter to EPA Re: Comments to the EPA Issue Paper on Glyphosate Dated September 12, 2016, Editor^Editors. 2016.	1/1/2016
1060			Roundup RTU Weed & Grass Killer III label	1/1/2016
1061			Monsanto CEO 'Roundup is Not a Carcinogen' - Here & Now	3/1/2016
1062			IARC's Malathion monograph	4/5/2016
1063			WHO International Classification of Disease, Version 10.	4/15/2016
1064			Memorandum of Points and Authorities in Support of OEHHA and Dr, Zeise's Motion for judgment on the Pleadings on Monsanto's First Amended Petition and Complaint and California Citrus Mutual et al.'s Complaint in Intervention	9/30/2016
1065			Dermal Absorption : position papers from the North American Free Trade	10/24/2016

			Agreement (NAFTA) Technical Working Group (TWG)	
1066			WHO: Originally Prepared as a Confidential Briefing for Governing Council Members on IARC Evaluation of Glyphosate and Requests for Meetings from Croplife	11/25/2016
1067			Report from Harvard School of Public Health website, Report links welding fumes with risk of cancer. https://www.hsph.harvard.edu/news/hsph-inthe-news/welding-fumes-cancer-risk/	1/1/2017
1068			Cal EPA, Office of Environmental Health Hazard Assessment. Safe Drinking Water and Toxic Enforcement Act of 1986 – Notice to Interested Parties April 7, 2017 – Chemical to be Listed as Known to the State of California to Cause Cancer: Glyphosate. https://oehha.ca.gov/media/downloads/crnr/032817tobelistedglyphosate.pdf	1/1/2017
1069			Cal EPA, Office of Environmental Health Hazard Assessment. Response to Comments Concerning the Notice of Intent to List Glyphosate as Causing Cancer under Proposition 65. March 2017. https://oehha.ca.gov/media/downloads/crnr/0317responsetocomments.pdf	1/1/2017
1070			Cal EPA, Office of Environmental Health Hazard Assessment. Initial Statement of Reasons – Title 27,	1/1/2017

			California Code of Regulations – Proposed Amendment to Section 25705(b) Specific Regulatory Levels Posing No Significant Risk – Glyphosate. March 28, 2017. https://oehha.ca.gov/media/downloads/proposition-65/chemicals/glyphosate032917isor.pdf.	
1071			California Office of Environmental Health Hazard Assessment, Letter from Consumer Law Firm to State of California OEHHA Re: Declassified Documents Relating to Monsanto and Roundup. 2017.	1/1/2017
1072			Department of Health and Human Services, DHHS Letter in Reponse to Phil Landrigan Comments on Glyphosate Biomonitoring. 2017.	1/1/2017
1073			International Agency for Research on Cancer, IARC Monographs on the evaluation of carcinogenic risks to humans - volume 112: Some organophosphate insecticides and herbicides. 2017.	1/1/2017
1074			International Agency for Research on Cancer, Letter from IARC in Response to U.S. Congressmen on IARC Monographs on Glyphosate. 2017.	1/1/2017
1075			Monsanto, Roundup Powermax II Label, Editor^Editors. 2017: US.	1/1/2017
1076			Monsanto, Roundup Powermax Label - UK, Editor^Editors. 2017: United Kingdom.	1/1/2017

1077			Monsanto, Roundup Weathermax Label, Editor^Editors. 2017: US.	1/1/2017
1078			Vandelac, L. and M.-H. Bacon, Notice of Objection to Re-assessment Decision RDV2017-01 on Glyphosate. 2017.	1/1/2017
1079			Monograph 112 Cover, available at https://monographs.iarc.fr/wp-content/uploads/2018/06/mono112-F01.pdf	1/1/2017
1080			Roundup Ready-To-Use Max Control 365	1/1/2017
1081			Impact Factor analysis	1/12/2017
1082			IARC Monographs on the Evaluation of Carcinogenic Risks to Humans, Volume 112	1/26/2017
1083			EPA, Transmission of Meeting Minutes and Final Report of the Decemeber 13-16, 2016 FIFRA SAP Meeting Held to Consider and Review Scientific Issues Associated with EPA's Evaluation of the Carcinogenic Potential of Glyphosate	3/16/2017
1084			Notice of Proposed Rulemaking: Amendment to Section 25705, Specific Regulatory Levels Posing No Significant Risk: Glyphosate	3/28/2017
1085			Tarazona et. aL, "Glyphosate toxicity and carcinogenicity: a review of the scientific basis of the European Union assessment and its differences with IARC," National Institutes of Health, https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5515989/	4/3/2017
1086			Comments of Monsanto re. OEHHA glyphosate NSRL	5/5/2017

			available at file:///C:/Users/rbwisner/Desktop/philip_w._miller_1.pdf	
1087			Letter from the EPA's Office of Inspector General to Congressman Ted Lieu re: investigation into EPA collusion with Monsanto	6/7/2017
1088			[Reuters website screencaps]	6/14/2017
1089			Comments of Christopher re OEHHA Glyphosate NSRL	6/16/2017
1090			Comments of Christopher re OEHHA Glyphosate NSRL	6/16/2017
1091			Baum Hedlund Comment Re OEHHA Glyphosate NSRL	6/21/2017
1092			Baum Hedlund Comment Re OEHHA Glyphosate NSRL	6/21/2017
1093			CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 (Proposition 65) NOTICE TO INTERESTED PARTIES	7/7/2017
1094			Corrigenda to the IARC Monographs – Volume 112: Some Organophosphate Insecticides and Herbicides available at https://monographs.iarc.fr/wp-content/uploads/2018/07/Corrigenda-Vol112.pdf	7/30/2017
1095			[Letter to Roger McClellan, Charles Whalley, and the Committee on Publication Ethics]	10/12/2017
1096			Response from Dr Wild to the Committee on Science, Space and Technology	11/20/2017
1097			Letter from the Committee on Science, Space and Technology to Dr Wild	12/8/2017

1098			Harvard School of Public Health website page of Richard Clapp, D.Sc, MPH	1/1/2018
1099			Cal EPA, Office of Environmental Health Hazard Assessment. Final Statement of Reasons – Title 27, California Code of Regulations – Section 25705(b) Specific Regulatory Levels Posing No Significant Risk – Glyphosate. April 10, 2018. https://oehha.ca.gov/media/downloads/crnr/glyphosatensrlfsor041018.pdf.	1/1/2018
1100			Risk Assessment Methodology for Hazardous Substances, New Zealand UK POEM Model 2018-Draft for consultation	1/1/2018
1101			Environmental Protection Agency, Testimony of Anna B. Lowit: Science Advisor, Office of Pesticide Programs U.S. Environmental Protection Agency Before House Committee on Science, Space, and Technology. 2018.	1/1/2018
1102			Wild, IARC response to criticisms of the Monographs and the glyphosate evaluation	1/1/2018
1103			IARC Response from Dr Wild to the Committee on Science, Space and Technology	1/11/2018
1104			Daniel Goldstein LinkedIn	2/22/2018
1105			Monsanto's Safety and Health	2/22/2018
1106			IARC's comment on the outcome of the Committee on Science, Space, and Technology Hearing	3/1/2018
1107			Mayo Clinic, Non-Hodgkin's Lymphoma, available at: https://www.mayoclinic.org/diseases-conditions/non-hodgkins-	4/10/2018

			lymphoma/symptoms-causes/syc-20375680	
1108			Risk Assessment Methodology for Hazardous Substances, New Zealand UK POEM Model 2018-Draft for consultation	5/15/2018
1109			American Cancer Society, Non-Hodgkin Lymphoma Risk Factors, available at: https://www.cancer.org/cancer/non-hodgkin-lymphoma/causes-risks-prevention/risk-factors.html	8/1/2018
1110			Dose-Response Assessment," n.d,, Tox Tutor, U.S, National Library of Medicine, National Institute of Health	8/1/2018
1111			IARC's comment on the outcome of the Committee on Science, Space, and Technology Hearing	8/2/2018
1112			NTP, RoC Process and Listing Criteria https://ntp.niehs.nih.gov/pubhealth/roc/process/index.html	8/8/2018
1113			Bayer AG - Investor Relations Conference Call: Discussion on Glyphosate Litigation	8/23/2018
1114			Flash Drive containing video of Donna Farmer used during her deposition	9/26/2018
1115			Cal EPA, Office of Environmental Health Hazard Assessment. Proposition 65 Safe Harbor Levels. https://oehha.ca.gov/proposition-65/general-info/current-proposition-65-no-significant-risklevels-nsrls-maximum.	10/4/2018
1116			List of Classifications by cancer sites with sufficient or limited evidence in humans, Volumes 1 to 123 available at	11/2/2018

			https://monographs.iarc.fr/wp-content/uploads/2018/07/Table4.pdf	
1117			OEHHA Glyphosate Fact Sheet	1/1/2019
1118			Elsevier: Undisclosed Conflicts of Interest	1/1/2019
1119			City of Hope, Lymphoma Treatments, Diagnosis, Symptoms, Research, available at: https://cityofhope.org/clinical-program/lymphoma	1/15/2019
1120			Preamble to the IARC Monographs, amended January 2019	1/17/2019
1121			IARC's AGENTS CLASSIFIED BY THE IARC MONOGRAPHS, VOLUMES 1–123, available at https://monographs.iarc.fr/agents-classified-by-the-iarc/	3/1/2019
1122			The International Code of Conduct on Pesticide Management	00/00/0000
1123			Corrigendum	00/00/0000
1124			The Risk Assessment Guidelines of 1986	00/00/0000
1125			Guidelines for Carcinogen Risk Assessment	00/00/0000
1126			[AGPRO Website Screencaps]	00/00/0000
1127			INITIAL STATEMENT OF REASONS TITLE 27, CALIFORNIA CODE OF REGULATIONS PROPOSED AMENDMENT TO: SECTION 25705(b) SPECIFIC REGULATORY LEVELS POSING NO SIGNIFICANT RISK GLYPHOSATE SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT OF 1986 PROPOSITION 65	00/00/0000
1128			Roundup Label	00/00/0000

1129			Roundup PRO Concentrate - Complete Directions for Use	00/00/0000
1130			Monsanto website screencaps - Eric Sachs, Ph.D. Q&A	00/00/0000
1131	MONGLY07306821	MONGLY07306826	Roundup Label	00/00/0000
1132	MONGLY08633551	MONGLY08633555	1 Gallon Label	00/00/0000
1133			Committee on Publication Ethics (COPE) "Ethical Guidelines for Peer Reviewers (Irene Hames on behalf of COPE Council, March 2013, v.1, www.publicationethics.org)	03/00/2013
1134			March 28, 1985 EPA memo re: EPA Reg. #524-308; Glyphosate, Miscellaneous Data; Dermal-Susitization and Dermal Absorption Caswell #: 661A	03/28/1985
1135			March 28, 1985 EPA memo re: EPA Reg. #524-308; Glyphosate, Miscellaneous Data; Dermal-Susitization and Dermal Absorption Caswell #: 661A	03/29/1985
1136			OECD/OCDE 427, "Guidelines for the testing of chemicals. Skin absorption in vivo Method," Adopted: 13 April 2004.	04/13/2004
1137			Guidance document on work-sharing in the northern zone in the authorisation of plant protection products, May 2017	05/00/2017
1138			Letter from Granjean, et al. to Dr. Schuchat, June 1, 2017 posted by Stephan Neidenbach https://www.documentcloud.org/documents/4 364139-Professor-Richard-Jackson-Emails- 17-	06/01/2017

			4988.html#document/p8 Page 100.	
1139			U.S. EPA OPP Memorandum June 2, 2010. IIReview of Triple Pack dermal absorption studies for Maxim Quattro."	06/02/2010
1140			U.S. EPA OPPTS 870.7600, "Health effects test guidelines dermal penetration," August 1998, pg. 4.	08/00/1998
1141			U.S. EPA, "Dermal exposure assessment: A summary of EPA approaches," September 2007. United States Environmental Protection Agency, National Center for Environmental Assessment Office of Research and Development, EPA/600/R-07/040F	09/00/2007
1142			Pesticide Action Network (PAN). http://pan-internationaLorg/wp-content/uploads/Glyphosatemonograph. Pdf	10/00/2016
1143			EPA (2015) Glyphosate: Report of the Cancer Assessment Review Committee. EPA's Office of Pesticide Programs, Health Effects Division. October 1, 2015.	10/01/2015
1144			OECD Guidance notes on dermal absorption, Draft, October 22, 2010.	10/22/2010
1145			International Committee of Medical Journal Editors, Uniform requirements for manuscripts submitted to biomedical journals.	12/00/2018
1146			Carolyn Crist, "Heavily used herbicide tied to shorter pregnancies", Reuters	12/18/2017
1147			Nurses' Health Study. http://www.nurseshealthstud	12/18/2017

			y.org/. Accessed 18 December 2017.	
1148			Hardeman v. Monsanto company complaint, et al. 3:16-cv-00525-VC	
1149			Stevick et al v. Monsanto company complaint 3:16-cv-02341-VC	
1150			Sheppard et al v. Monsanto company complaint 3:16-cv-05650-VC	
1151			Giglio v. Monsanto company complaint 3:16-cv-05658-VC	
1152			Gibbs v. Monsanto company complaint 3:16-cv-05652-VC	
1153			Couey v. Monsanto company complaint 3:16-cv-05653-VC	
1154			Ruiz et al v. Monsanto company complaint 3:16-cv-05659-VC	
1155			Scheffer v. Monsanto company complaint 3:16-cv-05660-VC	
1156			Teri Michelle McCall vs Monsanto company complaint 3:16-cv-05749-VC	
1157			Ines Hernandez et al v. Monsanto company complaint 3:16-cv-05750-VC	
1158			Peter Johansing v. Monsanto company complaint 3:16-cv-05751-VC	
1159			John D. Sanders et al v. Monsanto company complaint 3:16-cv-05752-VC	
1160			Means v. Monsanto company complaint 3:16-cv-05753-VC	
1161			Bridgeman v. Monsanto Complaint 3:16-cv-05785-VC	
1162			Harris v. Monsanto company complaint 3:16-cv-05786-VC	

1163			Patterson v. Monsanto company complaint 3:16-cv-05787-VC	
1164			Porath v. Monsanto company complaint 3:16-cv-05858-VC	
1165			Domina et al v. Monsanto company complaint 3:16-cv-05887-VC	
1166			Janise v. Monsanto Co complaint 3:16-cv-06004-VC	
1167			Work v. Ragan and Massey, Inc. et al complaint 3:16-cv-06005-VC	
1168			Tamburello v. Monsanto company complaint 3:16-cv-06007-VC	
1169			Abila v. Monsanto company complaint 3:16-cv-06008-VC	
1170			Carlock v. Monsanto company complaint 3:16-cv-06009-VC	
1171			Goodbred v. Monsanto company complaint 3:16-cv-06010-VC	
1172			Cushman v. Monsanto company complaint 3:16-cv-06018-VC	
1173			Ricci v. Monsanto company complaint 3:16-cv-06019-VC	
1174			Tonia Turner v. Monsanto company complaint 3:16-cv-06020-VC	
1175			Russo v. Monsanto company complaint 3:16-cv-06024-VC	
1176			Perkins v. Monsanto company complaint 3:16-cv-06025-VC	
1177			White v. Monsanto company complaint 3:16-cv-06026-VC	
1178			Burdett v. Monsanto company complaint 3:16-cv-06027-VC	
1179			Walker v. Monsanto company complaint 3:16-cv-06028-VC	
1180			Morris v. Monsanto company complaint 3:16-cv-06029-VC	

1181			Ford v. Monsanto company complaint 3:16-cv-06030-VC	
1182			Trimpe v. Monsanto company complaint 3:16-cv-06032-VC	
1183			Johnson v. Monsanto company complaint 3:16-cv-06043-VC	
1184			Mendoza v. Monsanto company complaint 3:16-cv-06046-VC	
1185			Mancuso v. Monsanto company complaint 3:16-cv-06047-VC	
1186			Pindell v. Monsanto company complaint 3:16-cv-06649-VC	
1187			Pecorelli v. Monsanto company complaint 3:16-cv-06936-VC	
1188			Penrod v. Monsanto company complaint 3:16-cv-05901-VC	
1189			Gebeyehou v. Monsanto company complaint 3:16-cv-05813-VC	
1190			Wilson v. Monsanto company complaint 3:16-cv-07369-VC	
1191			Barrera, et al., v. Monsanto Co. Complaint N15C-10-118	
1192			Ashworth v. Monsanto Co. Complaint N16C-02-242	
1193			Panthen v. Monsanto Co. Complaint N16C-04-037	
1194			Carr, et al., v. Monsanto Co. Complaint N16C-03-159	
1195			Matt, et al v. Monsanto Complaint N16C-11-276	
1196			Davis, et al., v. Monsanto Complaint N16C-11-164	
1197			Daniel K. Kowal v. Monsanto company complaint N16C-11-222	
1198			Johnson (Dewayne) v. Monsanto Co., et al. Complaint CGC-16-550128	

1199			Peterson, et al., v. Monsanto Co., et al. Complaint 1622-CC01071	
1200			Kane, et al., v. Monsanto Co. complaint 1622-CC10172	
1201			Kennedy v. Monsanto company complaint 16CM-CC00001	
1202			Billings v. Monsanto company complaint RG17852375	
1203			Roth v. Monsanto company complaint complaint RG17854000	
1204			Dr. A. Neugut 05/01/2017 Expert Report	05/01/2017
1205			Dr. A. Neugut 12/18/2017 Supplemental Expert Report	12/18/2017
1206			Dr. B. Ritz 05/01/2017 Report	05/01/2017
1207			Dr. B. Ritz 08/18/2017 Rebuttal Expert Report	08/18/2017
1208			Dr. B. Ritz 12/18/2017 2Supplemental Expert Report	12/18/2017
1209			Dr. B. Ritz, Introduction to Cohort Studies (2012) Lecture Slides	00/00/2012
1210			Dr. B. Ritz, Review: Causal Inference in Epidemiology Confounding (2010)	00/00/2010
1211			Dr. B. Ritz, Screening / Misclassification of Disease or Exposure Information Bias (2017)	00/00/2017
1212			Dr. C. Benbrook 12/22/2017 report in Johnson v. Takeda	12/22/2017
1213			Dr. C. Benbrook 12/22/2017 report in B725 Johnson v. Takeda	12/22/2017
1214			Dr. C. Corcoran Expert Report	07/31/2017
1215			Dr. C. Nabhan 05/01/2017 Expert Report	05/01/2017
1216			Dr. C. Nabhan 12/18/2017 Supplemental Expert Report	12/18/2017

1217			Dr. C. Nabhan 12/22/2017 report in Johnson v. Takeda	12/22/2017
1218			Dr. D. Weisenburger 05/01/2017 Expert Report	05/01/2017
1219			Dr. D. Weisenburger 12/18/2017 Supplemental Report	12/18/2017
1220			Dr. Fowle 1/27/2018 Expert Report	01/27/2018
1221			Dr. J. Rider 07/31/2017 Expert Report	07/31/2017
1222			Dr. J. Rider 12/21/2017 Supplemental Expert Report	12/21/2017
1223			Dr. Khatib 1/22/2018 Expert Report.	1/22/2018
1224			Dr. L Mucci 12/21/2017 Supplemental Expert Report	12/21/2017
1225			Dr. L. Mucci 07/31/2017 Expert Report	07/31/2017
1226			Dr. Portier Rebuttal Report	08/18/2017
1227			Dr. Portier Supplemental Report	12/21/2017
1228			Dr. Portier, Original Expert Report with Appendices	04/21/2017
1229			Dr. Portier, Revised Expert Report	N/A
1230			Dr. Sullivan 1/22/2018 Expert Report	01/22/2018
1231			Dr. T. Kuzel 1/22/2018 Expert Report	01/22/2018
1232			Dr. T. Rosol 07/31/2017 Expert Report	07/31/2017
1233			Dr. W. Fleming 07/31/2017 Expert Report	07/31/2017
1234			Dr. W. Foster 07/31/2017 Expert Report	07/31/2017
1235			Dr. W. Jameson 05/01/2017 Expert Report	05/01/2017
1236			Dr. W. Jameson 12/18/2017 Supplemental Expert Report	12/18/2017
1237			Dr. W. Sawyer 12/22/2017 report in Johnson v. Takeda	12/22/2017

1238			Expert Report of Dr. Beate Ritz (5/1/2017)	05/01/2017
1239			Expert Report of Dr. Dennis Weisenburger (4/21/2017)	04/21/2017
1240			Supplemental Expert Report of Dennis Weisenburger	12/18/2017
1241			Supplemental Expert Report of Dr. Chadi Nabhan (12/21/2017).	12/21/2017
1242			Expert Report of Dr. Chadi Nabhan in Pilliod et al. v. Monsanto	04/28/2017
1243			Expert Report of Dr. William Sawyer in Pilliod et al v. Monsanto	01/14/2019
1244			Expert Report of Dr. William Sawyer in Johnson v. Monsanto	12/22/2017
1245			Expert Report of Dr. Charles Benbrook in Johnson v. Monsanto	07/31/2018
1246			Expert Report of Dr. Charles Benbrook in In Re Roundup Products Liability Litigation (MDL 2741).	01/30/2019
1247			Expert Report of Dr. William Pease in Pilliod et al. v. Monsanto	01/11/2019
1248			Expert Report of Dr. Charles Jameson in In Re Roundup Products Liability Litigation (MDL 2741).	03/20/2017
1249			Dr. B. Ritz, Review: Causal Inference in Epidemiology Confounding (2010)	00/00/2010
1250			Dr. B. Ritz, Introduction to Cohort Studies (2012) Lecture Slides	00/00/2012
1251			Dr. B. Ritz, Screening / Misclassification of Disease or Exposure Information Bias (2017)	00/00/2017
1252			Mucci retention letter	1/28/2016

1253			Revised Expert Report of Dr. Christopher Portier	8/16/2017
1254			Supplemental Expert Report of Dr. Beate Ritz (12/18/2017)	12/18/2017
1255			Dewayne Johnson vs Monsanto Company, Confidential Videotaped Deposition Of Dr. Charles M. Benbrook: February 8, 2018, Editor^Editors. 2018, San Francisco: Superior Court of the State of California, County of San Francisco.	00/00/2018
1256			Dewayne Johnson vs Monsanto Company, Confidential Videotaped Deposition Of Dr. Charles M. Benbrook: February 9, 2018, Editor^Editors. 2018, Orange, VA: SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN FRANCISCO.	00/00/2018
1257			Dewayne Johnson vs Monsanto Company, Defendant Monsanto Company's Notice Of Videotaped Deposition Of Charles M. Benbrook Via Deposition Subpoena, Editor^Editors. 2018: SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN FRANCISCO.	00/00/2018
1258			Aaron Blair 03/20/2017 Deposition Transcript	3/20/2017
1259			Matthew Ross 05/13/2017 Deposition Transcript	5/13/2017
1260			Acquavella, John deposition transcript	4/7/2017
1261			Acquavella, John deposition transcript	4/8/2017

1262			Adams, Stephen deposition transcript	1/26/2017
1263			Azevedo, Kirk depo deposition transcript	6/8/2016
1264			Blair, Aaron depo deposition transcript	3/20/2017
1265			Borne, Donald deposition transcript	1/29/2017
1266			Corcoran, Christopher deposition transcript	9/20/2017
1267			Farmer, Donna deposition transcript	1/11/2017
1268			Farmer, Donna deposition transcript	1/12/2017
1269			Farmer, Donna deposition transcript	9/26/2018
1270			Farmer, Donna deposition transcript	9/27/2018
1271			Farmer, Donna deposition transcript	1/24/2019
1272			Fleming, William deposition transcript	9/19/2017
1273			Foster, Warren deposition transcript	9/15/2017
1274			Garcia, Paul deposition transcript	1/28/2019
1275			Goldstein, Daniel deposition transcript	1/18/2017
1276			Goldstein, Daniel deposition transcript	11/16/2017
1277			Goldstein, Daniel deposition transcript	11/17/2017
1278			Goldstein, Daniel deposition transcript	2/27/2018
1279			Goodman, Jay deposition transcript	9/22/2017
1280			Grant, Hugh deposition transcript	2/4/2019
1281			Guard, Jim deposition transcript	1/27/2017
1282			Hayes, Wallace deposition transcript	2/7/2019

1283			Heering, David deposition transcript	2/22/2017
1284			Heydens, William deposition transcript	1/23/2017
1285			Heydens, William deposition transcript	1/24/2017
1286			Jameson, Charles deposition transcript	5/3/2017
1287			Jameson, Charles deposition transcript	9/21/2017
1288			Jameson, Charles deposition transcript	1/10/2018
1289			Jenkins, Dan deposition transcript	3/21/2017
1290			Kier, Larry deposition transcript	2/5/2019
1291			Kier, Larry deposition transcript	2/5/2019
1292			Koch, Michael deposition transcript	1/11/2019
1293			Manchester, Doreen (CropLife America) deposition transcript	1/8/2019
1294			Martens, Mark deposition transcript	4/7/2017
1295			Martino-Catt, Susan deposition transcript	3/30/2017
1296			McClellan, Roger deposition transcript	2/6/2019
1297			Mucci, Lorelei deposition transcript	9/22/2017
1298			Mucci, Lorelei deposition transcript	1/23/2018
1299			Murphy, Samuel deposition transcript	1/22/2019
1300			Nabhan, Chadi deposition transcript	8/23/2017
1301			Nabhan, Chadi deposition transcript	1/15/2018
1302			Neugut, Alfred deposition transcript	8/7/2017
1303			Neugut, Alfred deposition transcript	1/3/2018

1304			O'Shanick, Gregory deposition transcript	TBD
1305			Pease, William deposition transcript	2/11/2019
1306			Portier, Christopher deposition transcript	9/5/2017
1307			Portier, Christopher deposition transcript	1/12/2018
1308			Portier, Christopher deposition transcript	2/21/2019
1309			Portier, Christopher deposition transcript	2/22/2019
1310			Portier, Christopher deposition transcript	2/23/2019
1311			Raj, Kavitha P. deposition transcript	1/8/2019
1312			Rands, Todd deposition transcript	2/12/2019
1313			Reeves, William deposition transcript	1/23/2019
1314			Reeves, William deposition transcript	1/24/2019
1315			Reiss, Rick deposition transcript	2/18/2019
1316			Rider, Jennifer deposition transcript	9/21/2017
1317			Rider, Jennifer deposition transcript	1/23/2018
1318			Ritz, Beate deposition transcript	9/18/2017
1319			Ritz, Beate deposition transcript	1/19/2018
1320			Rosol, Thomas deposition transcript	9/15/2017
1321			Ross, Matthew deposition transcript	5/3/2017
1322			Rowland, Jesudoss deposition transcript	4/24/2017
1323			Sachs, Eric deposition transcript	9/18/2018
1324			Sachs, Eric deposition transcript	1/22/2019

1325			Saltmiras, David deposition transcript	1/31/2017
1326			Saltmiras, David deposition transcript	2/1/2017
1327			Turk, C. Roger deposition transcript	10/31/2018
1328			Weisenburger, Dennis deposition transcript	9/11/2017
1329			Weisenburger, Dennis deposition transcript	1/22/2018
1330			Rozeboom WW. The fallacy of the null-hypothesis significance test. Psychol Bull. 1960;57(5):416.	1/1/1960
1331			Hill, A.B., The Environment and Disease: Association or Causation? Proc R Soc Med, 1965. 58: p. 295-31.	1/1/1965
1332			Jaworski, E. G., "Mode of action of N-phosphonomethylglycine. Inhibition of aromatic amino acidbiosynthesis," 1972, J. Agric. Food Chem. 20 (6), pg. 1195-1198.	1/1/1972
1333			Reyna, M.S. and D.E. Gordon, 18-Month Carcinogenicity Study with CP67573 in Swiss White Mice: Monsanto. 1973: Industrial Bio-Test Laboratories, Inc.	1/1/1973
1334			Colvin, L. B., et al., Final Report on CP 67573 Residue and Metabolism. Aug. 1973. Monsanto.	8/1/1973
1335			Reyna, M.S., Gordon, D.E. , Two- Year Chronic Oral Toxicity Study with CP67573 in Albino Rats: Monsanto. 1974.	1/1/1974
1336			Franz TJ., "Percutaneous absorption. On the relevance of in vitro data," 1975, J Invest DermatoL 64, pg. 190-5.	1/1/1975

1337			Shirasu, Y., et al. The report of mutagenic study with bacteria for CP67573. Institute of Environmental Toxicology. 20 Jul. 1978.	1/1/1978
1338			Yates W, Akesson N, Bayer D. Drift of glyphosate sprays applied with aerial and ground equipment. Weed Science. 1978:597-604.	1/1/1978
1339			Kier, L., Final Report on Salmonella Mutagenicity Assay of Glyphosate. 16 June 1978. Monsanto Company Environmental Health Laboratory. van de Waart, E. J., Report: Evaluation of the Ability of Glyfosaat to Induce Chromosome Aberrations in Cultured Peripheral Human Lymphocytes (with Independent Repeat). 1995 June 30. Notox.	6/16/1978
1340			Burnett, P., Borders, J.;,Kush, J. , Report to Monsanto Company: Two Year Chronic Oral Toxicity Study with CP- 7611 in Albino Rats. 1979, Industrial Bio-Test Laboratories, Inc.: on behalf of Monsanto Co.	1/1/1979
1341			Olorunsogo, O.O., E.A. Bababunmi, and O. Bassir, Effect of glyphosate on rat liver mitochondria in vivo. Bull Environ Contam Toxicol, 1979. 22(3): p. 357-64.	1/1/1979
1342			Hannah, L. H., Two-year Oral Toxicity Study with CP 67573 in albino rats, BTL-71-32; IBT No. B564, 1974. International Research and Development Corporation,	1/1/1980

			Teratology Study in Rabbits, 1980.	
1343			Hollander, H., & Amrhein, N., "The site of the inhibition of the shikimate pathway by glyphosate," 1980, Plant Physiol 66(5), pg. 823-829.	1/1/1980
1344			Maeda K, Okazaki F, Suenaga T, Sakurai T, Takamatsu M. Low back pain related to bowing posture of greenhouse farmers. J Hum Ergol (Tokyo). 9(2):117-123.	1/1/1980
1345			Oleson, R. Dominant lethal mutagenicity assay with technical glyphosate in mice. Memorandum to W. D. Carpenter. 24 Apr. 1980, Monsanto.	1/1/1980
1346			Vigfusson, N.V. and E.R. Vyse, The effect of the pesticides, Dexon, Captan and Roundup, on sister-chromatid exchanges in human lymphocytes in vitro. Mutat Res, 1980. 79(1): p. 53-57.	1/1/1980
1347			Hogan, g.k., A chronic Feeding Study of Glyphosate (Roundup Technical) in Rats. 1981, Monsanto: Bio/dynamics Inc., E. Millstone, NJ.	1/1/1981
1348			Lankas, G., P., A Lifetime Study of Glyphosate in Rats. 1981, Monsanto: Report No. 77-2062 prepared by Bio Dynamics, Inc.	1/1/1981
1349			Wildeman, A. G., & Nazar, R. N. (1982). Significance of plant metabolism in the mutagenicity and toxicity of pesticides. Canadian Journal of Genetics and Cytology, 24(4), 437-449.	1/1/1982

1350			Boocock, M. R., "Kinetics of 5-enolpyruvylshikimate-3-phosphate synthase inhibition by glyphosate," 1983, FEBS Letters L54, Pg, L27-L33'	1/1/1983
1351			Dirks R. C., Study Summary: The Hepatocyte Primary Culture/DNA Repair Assay on Compound JJN-1020 (Glyphosate) Using Rat Hepatocytes in Culture. 21 Oct 1983. Monsanto.	1/1/1983
1352			Knezevich, A.L. and G.K. Hogan, A chronic feeding study of glyphosate in mice: Monsanto. 1983: Bio/Dynamic Inc., dated July 21, 1983. Report No. 77-2011.	1/1/1983
1353			Li, A. P., CHO/HGPRT Gene Mutation Assay with Glyphosate, Monsanto Company Environmental Health Laboratory, 20 Oct. 1983.	1/1/1983
1354			Li, A. P., Effects of Glyphosate on Rat Bone Marrow Cells, Monsanto Company Environmental Health Laboratory, 21 Oct. 1983.	1/1/1983
1355			Li, A. P., In Vivo Bone Marrow Cytogenetics Study of Glyphosate in Sprague-Dawley Rats, Monsanto Company Environmental Health Laboratory, 20 Oct. 1983.	1/1/1983
1356			Maibach, H.I., "(a) Elimination of 14C-glyphosate in Rhesus monkeys following a single parenteral dose, (b) Percutaneous absorption of 14C-glyphosate in Roundup formulation in Rhesus monkeys following a single	1/1/1983

			topical dose," 1983, Unpublished report No. MA-81-349, from University of California, School of Medicine, San Francisco, California, USA. Submitted to WHO by Monsanto Int. Services SA, Brussels, Belgium.	
1357			Moriya, M., et al., Further mutagenicity studies on pesticides in bacterial reversion assay systems. Mutat Res, 1983. 116(3-4): p. 185-2006.	1/1/1983
1358			National Research Council. 1983. Risk assessment in the federal government. Managing the process. National Academy Press, Washington, DC. https://www.nap.edu/catalog/366/risk-assessment-in-the-federal-government-managing-theprocess	1/1/1983
1359			Pattengale, P.K. and C.R. Taylor, Experimental models of lymphoproliferative disease. The mouse as a model for human non-Hodgkin's lymphomas and related leukemias. Am J Pathol, 1983. 113(2): p. 237-65.	1/1/1983
1360			Portier, C. and D. Hoel, Optimal design of the chronic animal bioassay. J Toxicol Environ Health, 1983. 12(1): p. 1-19.	1/1/1983
1361			Portier, C.J. and D.G. Hoel, Design of the Chronic Animal Bioassay for Goodness of Fit to Multistage Models. Biometrics, 1983. 39(3): p. 809-809.	1/1/1983

1362			Long, T. Memorandum: Aminomethyl Phosphonic Acid (CP 50435): Mutagenicity tudies. 3 May 1983. Monsanto.	5/3/1983
1363			The Murky World of Toxicity Testing	6/10/1983
1364			SUMMARY OF THE IBT REVIEW PROGRAM - OFFICE OF PESTICIDE PROGRAMS	7/1/1983
1365			Additional Information Relating to Chronic Mouse Study, BD-77-420. Letter to Director, Office of Pesticide Programs and US EPA. 20 Mar. 1984.	1/1/1984
1366			Hard GC (1984). High frequency, single-dose model of renal adenoma/carcinoma induction using dimethylnitrosamine in Crl:(W) BR rats. Carcinogenesis 5:1047-1050	1/1/1984
1367			Haseman, J.K., J. Huff, and G.A. Boorman, Use of historical control data in carcinogenicity studies in rodents. Toxicol Pathol, 1984. 12(2): p. 126-35.	1/1/1984
1368			Newton M, Howard KM, Kelpsas BR, Danhaus R, Lottman CM, Dubelman S. Fate of glyphosate in an Oregon forest ecosystem. Journal of Agricultural and Food Chemistry. 32(5):1144-1151.	1/1/1984
1369			Baczako, K., et al., Morphogenesis and possible precursor lesions of invasive carcinoma of the papilla of Vater: epithelial dysplasia and adenoma. Hum Pathol, 1985. 16(3): p. 305-10.	1/1/1985

1370			EPA, Memorandum: Consensus Review of Glyphosate Casewell No. 661A, Office of Pesticides and Toxic Substances. 4 Mar. 1985.	1/1/1985
1371			Gingerich, Lyle L. EPA Toxicology Branch/ Roundup, Letter to T. F. Armstrong, et al., 22 Feb. 1985, Monsanto.	1/1/1985
1372			Holden, L. R., Examination of Crump's Multistage Model. Memorandum to E. E. Debus. 24 Jul. 1985, Monsanto.	1/1/1985
1373			Johannsen, F.R. [No Subject]. Memorandum to R. W. Street. 1 Mar. 1985, Monsanto.	1/1/1985
1374			Lacayo, H., Memorandum: Preliminary [sic] Risk Assessment for Glyphosate - Draft, Toxicology Branch/HED. 1985, US EPA.	1/1/1985
1375			Lacayo, H., Memorandum: Use of historical data in determiningthe weight of evidence from kidney tumor incidence in the Glyphosate two-year feeding study and some remarks on false positives, S.M.S. Branch, Editor. 1985, US EPA: Washington, DCC.	1/1/1985
1376			Long, Timothy, J. Memorandum: Addendum to Chronic Feeding Study with Glyphosate in Mice BD-77-420, Dept. of Med. and Env. Health. 1985, Monsanto.	1/1/1985
1377			Long, Timothy, J. Possible Response to Press Release of EPA Internal Document	1/1/1985

			on Glyphosate - Revised Draft. 26 Mar. 1985, Monsanto.	
1378			Pathco Inc. Lifetime Feeding in Mice, 77-420, Report, 10 Oct. 1985.	1/1/1985
1379			Response to EPA Memo, and further Author Unknown (date unknown) Response to EPA memo (Lacayo, Memorandum: Use of historical data in determining the weight of evidence from kidney tumor incidence in the Glyphosate two-year feeding study and some remarks on false positives, S.M.S. Branch, Editor. 1985, US EPA: Washington, DCC), Monsanto.	1/1/1985
1380			Reyna, M and Reucker, F. A. Twelve Month Study of Glyphosate Administered by Gelatin Capsule to Beagle Dogs. Monsanto Environmental Health Laboratory. 22 Aug. 1985.	1/1/1985
1381			Rose G. Sick individuals and sick populations. Int J Epidemiol. 1985; 14(1):32-38.	1/1/1985
1382			Salsburg DS. The religion of statistics as practiced in medical journals. The American Statistician. 1985;39(3):220-223.	1/1/1985
1383			Serdy, Frank S. and Monsanto. Roundup Herbicide EPA Reg. No. 524-308, Chronic Mouse Study with Glyphosate. Letter to Director, Office of Pesticide Progams and US EPA. 26 Mar. 1985.	1/1/1985

1384			Serdy, Frank S. and Monsanto. Roundup Herbicide EPA Reg. Nos. 524-308, 524-330, 524-339, 524-332, 524-343: Chronic Mouse Study with Glyphosate. Letter to Douglas Campt US EPA. 13 Mar. 1985.	1/1/1985
1385			Serdy, Frank S. and Monsanto. Roundup Herbicide EPA Reg. Nos. 524-308, 524-330, 524-339, 524-332, 524-343: Chronic Mouse Study with Glyphosate. Letter to Robert Taylor US EPA. 21 May 1985.	1/1/1985
1386			Serdy, Frank S. Glyphosate mouse study: Additional Steps. Letter to Tim Long. 28 Aug. 1985.	1/1/1985
1387			Sher, S. P. and Merck Institute for Therapeutic Research. Control data on CD-1 mouse: Enclosure, Letter to David McFadden, Monsanto Company. 22 Mar. 1985	1/1/1985
1388			Street, Robert W. and Monsanto, Roundup Herbicide. Letter to Director, Office of Pesticide Programs and US EPA. 21 Aug. 1985.	1/1/1985
1389			Weisenburger, D.D., Lymphoid Malignancies in Nebraska: A Hypothesis. Nebr Med J, 1985.70(8): p. 31-305.	1/1/1985
1390			Consensus Review of Glyphosate Caswell No. 661A	3/4/1985
1391			EPA: Consensus Review of Glyphosate	3/4/1985
1392			EPA Memo: Roundup; Glyphosate; Pathology Report on Additional Kidney Sections -	12/12/1985

			Dykstra Memo re. Re-sectioning	
1393			EPA Reg. t: 524-308; Roundup; Glyphosate; Pathology Report on Additional Kidney Sections Caswell No. 661A Accession No. 259621	12/12/1985
1394			Hoar SK, Blair A, Holmes FF, et al. Agricultural herbicide use and risk of lymphoma and soft-tissue sarcoma. JAMA. 1986;256(9):1141-1147.	1/1/1986
1395			Kaye DH. Is Proof of Statistical Significance Relevant? 1986.	1/1/1986
1396			Portier, C.J., J.C. Hedges, and D.G. Hoel, Age-specific models of mortality and tumor onset for historical control animals in the National Toxicology Program's carcinogenicity experiments. Cancer Res, 1986. 46(9): p. 4372-8.	1/1/1986
1397			Uelner, A. F. IBT B564 - BTL 71-32; Two-Year Chronic Oral Toxicity Study with CP 67573 in Albino Rats, Letter to T. J. Long, 8 Sept. 1986. Monsanto.	1/1/1986
1398			Walker AM. Reporting the results of epidemiologic studies. Am J Public Health. 1986;76(5):556-558.	1/1/1986
1399			EPA Memo: Transmittal of the Final FIFRA Scientific Advisory Panel Reports on the February 11-12, 1986 Meeting - SAP Decision	2/24/1986
1400			Transroittal of the Final FIFRA Scientific Advisory Panel Reports on the February 11-12, 1986 Meeting	2/24/1986
1401			EPA: Guidance for the Reregistration of Pesticide	6/1/1986

			Products Containing Glyphosate as the Active Ingredient	
1402			Guidance for the Reregistration of Pesticide Products Containing Glyphosate as the Active Ingredient	7/1/1986
1403			Pavkov, K.L., Turnier, J.C. , Two-Year Chronic Toxicity and Oncogenecity Dietary Study with SC-0224 in Mice. 1987: Stauffer Chemical Company.	1/1/1987
1404			Poole C. Beyond the confidence interval. Am J Public Health. 1987;77(2):195-199.	1/1/1987
1405			Stout, L..D. and Johnson, C. 90 Day Study of Glyphosate Administered in Feed to Sprague/Dawley Rats. Monsanto Environmental Health Laboratory. 30 Nov. 1987.	1/1/1987
1406			Bailer, A.J. and C.J. Portier, Effects of treatment-induced mortality and tumorinduced mortality on tests for carcinogenicity in small samples. Biometrics, 1988. 44(2): p. 417-31.	1/1/1988
1407			Evans, S. et al., The end of the p value? 60 Brit. Heart J. 177 (1988).	1/1/1988
1408			Li, A.P. and T.J. Long, An evaluation of the genotoxic potential of glyphosate. Fundam.Appl Toxicol, 1988. 10(3): p. 537-546.	1/1/1988
1409			Lipsky ML and Trump BF (1988). Chemically induced renal epithelial neoplasia in	1/1/1988

			experimental animals. Int. Rev. Exp. Pathol. 30:357-383	
1410			Reagan, E. L. and Laveglia, J. Acute Oral Toxicity Study of Glyphosate Batch/Lot/NBR No. XLI-55 in Sprague-Dawley Rats, Food and Drug Research Laboratories. 8 June 1988.	1/1/1988
1411			Reagan, E. L. and Laveglia, J. Volume 3: Primary Irritation Study of Glyphosate, Food and Drug Research Laboratories. 8 June 1988.	1/1/1988
1412			Sawada, Y., Nagai, Y., Ueyama, M., and Yamamoto, I., "Probable toxicity of surface active agent in commercial herbicide containing glyphosate," 1988, Lancet 1 (8580), pg. 29.	1/1/1988
1413			Weber J, Phaneuf D, Samuel O, Guillot J, Manca D. Etude de l'exposition professionnelle des travailleurs forestiers exposés au glyphosate. Centre de toxicologie du Québec, Québec. 1988.	1/1/1988
1414			Huff JE, McConnell EE, Haseman JK, Boorman GA, Eustis SL, Schwetz BA, Rao GN, Jameson CW, Hart LG, Rall DP. Carcinogenesis studies: results of 398 experiments on 104 chemicals from the U.S. National Toxicology Program. Ann N Y Acad Sci.; 534:1-30.	6/1/1988
1415			Complaint in Collins v. Monsanto	1/1/1989
1416			Portier, C.J. and A.J. Bailer, 2-Stage Models of Tumor-Incidence for Historical Control Animals in the National Toxicology Programs	1/1/1989

			Carcinogenicity Experiments. Journal of Toxicology and Environmental Health, 1989. 27(1): p. 21-45.	
1417			Portier, C.J. and A.J. Bailer, Testing for increased carcinogenicity using a survivaladjusted quantal response test. Fundam Appl Toxicol, 1989. 12(4): p. 731-7.	1/1/1989
1418			Roe, D. "Incentive-Conscious Approach to Toxic Chemical Control. Economic Development Quarterly 3: 179-187 (1989).	1/1/1989
1419			Reyna, M. S. and Thake, D. C., Rangefinding Study in Glyphosate Administered in Feed to Sprague-Dawley Rats, Monsanto Company Environmental Health Laboratories. 10 Apr. 1989.	4/10/1989
1420			Anscombe, F., The Summarizing of Clinical Experiments by Significance Levels , 9 Statistics in Medicine 703 (1990).	1/1/1990
1421			Blair Aaron et al., Methodological Issues in Exposure Assessment for Case-Control Studies of Cancer and Herbicides, Am. J. Ind. Med., 1990, 18:285-293.	1/1/1990
1422			Brown LM, Blair A, Gibson R, Everett GD, Cantor KP, Schuman LM et al. (1990). Title missing -- Pesticide Exposures and Other Agricultural Risk Factors for Leukemia among Men in Iowa and Minnesota Cancer Research 50 6585-6591.	1/1/1990

1423			Feng JC, Thompson DG. Fate of glyphosate in a Canadian forest watershed. II: Persistence in foliage and soils. Journal of Agricultural and Food Chemistry. 38(4):1118-1125.	1/1/1990
1424			Mary O'Brien, Roundup, Vision, POEA and 1, 4 Dioxane: Why Full Formlations are the Problem , Journal of Pesticide Reform	1/1/1990
1425			Pease W, L Zeise and A Kelter. "Risk assessment for carcinogens under California's Proposition 65." Risk Analysis 10(2): 255-271 (1990). https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1539-6924.1990.tb01047.x	1/1/1990
1426			Portier, C.J. and L. Edler, Two-stage models of carcinogenesis, classification of agents, and design of experiments. Fundam Appl Toxicol, 1990. 14(3): p. 444-60.	1/1/1990
1427			Portier, C.J., et al., Biologically based models for risk assessment. IARC Sci Publ, 1990(104): p. 20-8.	1/1/1990
1428			Stout, L.D.a.R., P.A., Chronic Study of Glyphosate Administered in Feed to Albino Rats. 1990: Monsanto.	1/1/1990
1429			Tupker, R. et al., "Susceptibility to irritants: role of barrier function, skin dryness and history of atopic dermatitis," 1990, BJD. Volume 123, Issue 2, pg. 199-205.1990	1/1/1990

1430			Weisenburger, D.D., Environmental Epidemiology of Non-Hodgkin's Lymphoma in Eastern Nebraska. Am J Ind Med, 1990. 18(3): p. 303-305.	1/1/1990
1431			Zahm SH, Weisenburger DD, Babbitt PA, et al. A case-control study of non-Hodgkin's lymphoma and the herbicide 2,4-dichlorophenoxyacetic acid (2,4-D) in eastern Nebraska. Epidemiology. 1990;1(5):349-356.	1/1/1990
1432			Pesticide exposures and other agricultural risk factors for leukemia among men in Iowa and Minnesota. Cancer Res, 50(20):6585–91.	10/15/1990
1433			Brewster, D.W., J. Warren, and W.E. Hopkins, Metabolism of glyphosate in Sprague-Dawley rats: tissue distribution, identification, and quantitation of glyphosate-derived materials following a single oral dose. Fundam.Appl Toxicol, 1991. 17(1): p. 43-51.	1/1/1991
1434			Complaint in Courture v. Monsanto	1/1/1991
1435			Dancik BP. Importance of Peer Review. The Serials Librarian. 1991;19(3-4):91-94.	1/1/1991
1436			EPA, EPA Memo Stout and Ruecker, I. William Dykstra.Toxicology Branch, Editor. 1991. V. MRID 416438-01 Tox review 18897. p.	1/1/1991
1437			EPA, Memo on the Second Peer Review of Glyphosate, October 30, 1991, From:	1/1/1991

			William Dykstra and George Ghali, To: Robert Taylor	
1438			EPA, Memo: Peer Review of Glyphosate, June 5, 1991, From: William Dykstra, to: Esther Rind	1/1/1991
1439			Jauhiainen A, Rasanen K, Sarantila R, Nuutinen J, Kangas J. Occupational exposure of forest workers to glyphosate during brush saw spraying work. Am Ind Hyg Assoc J. 1991;52(2):61-64.	1/1/1991
1440			Jauhianien, et al, Occupational Exposure of Forest Workers to Glyphosate During Brush Saw Spraying Work, , Am. Ind. Hyg. Assoc. J., February 1991	1/1/1991
1441			Kopp-Schneider, A. and C.J. Portier, Distinguishing between models of carcinogenesis: the role of clonal expansion. Fundam Appl Toxicol, 1991. 17(3): p. 601-13.	1/1/1991
1442			Kopp-Schneider, A., C.J. Portier, and F. Rippmann, The application of a multistage model that incorporates DNA damage and repair to the analysis of initiation/promotion experiments. Math Biosci, 1991. 105(2): p. 139-66.	1/1/1991
1443			Pease W. "Chemical hazards and the public's right to know: How effective is California's Proposition 65?" Environment 33(10): 12-20 (1991). https://www.tandfonline.com/doi/abs/10.1080/1139157.1991.9932550	1/1/1991
1444			Riihimaki H. Low-back pain, its origin and risk indicators.	1/1/1991

			Scand J Work Environ Health. 17(2):81-90.	
1445			Wester, R.C., et al., Glyphosate skin binding, absorption, residual tissue distribution, and skin decontamination. Fundam.Appl Toxicol, 1991. 16(4): p. 725-732.	1/1/1991
1446			Bommannan D, Potts RO, Guy RH, "Examination of the effect of ethanol on human stratum-corneum in vivo using infrared-spectroscopy," L991, J Control Release, Vol, 16, pg.299-304	8/1/1991
1447			Cantor KP, Blair A, Everett G, et al. Pesticides and other agricultural risk factors for non- Hodgkin's lymphoma among men in Iowa and Minnesota. Cancer Res. 1992, 52(9):2447-2455.	1/1/1992
1448			Chan, P. and J. Mahler, Toxicity Studies of Glyphosate (CAS No. 1071836) Administered in Dosed Feed to F344/N Rats and B6C3F1 Mice, N.T. Program, Editor. 1992: Research Triangle Park, NC.	1/1/1992
1449			Chandra, M. and C.H. Frith, Spontaneous neoplasms in aged CD-1 mice. Toxicol Lett, 1992. 61(1): p. 67-74.	1/1/1992
1450			De Marco, Antonio, De Simone, Claudio, Raglione, Marcello, Testa, Antonella, & Trinca, Stefania. (1992). Importance of the type of soil for the induction of micronuclei and the growth of primary roots of Vicia faba	1/1/1992

			treated with the herbicides atrazine, glyphosate and maleic hydrazide. Mutation Research/Genetic Toxicology, 279(1), 9-13. doi:https://doi.org/10.1016/0165-12008(92)90260-7. http://www.sciencedirect.com/science/article/pii/0165120089290260 7.	
1451			Devesa, S.S. and T. Fears, Non-Hodgkin's lymphoma time trends: United States and international data. Cancer Res, 1992. 52(19 Suppl): p. 5432s-5440s.	1/1/1992
1452			Hartge, P. and S.S. Devesa, Quantification of the impact of known risk factors on time trends in non-Hodgkin's lymphoma incidence. Cancer Res., 1992. 52(19 Suppl): p. 5566s-5569s.	1/1/1992
1453			Kopp-Schneider, A. and C.J. Portier, Birth and Death Differentiation Rates of Papillomas in Mouse Skin. Carcinogenesis, 1992. 13(6): p. 973-978.	1/1/1992
1454			Lavy et al., Confier Seedling Nursey Worker Exposure to Glyphosate; Arch. Environ. Contam. Toxcol 22, 6-13 (1992)	1/1/1992
1455			Pease W. "The role of cancer risk in the regulation of industrial pollution." Risk Analysis 12(2): 253-265 (1992). https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1539-6924.1992.tb1673.x	1/1/1992
1456			Pease, W. "Identifying chemical hazards for regulation: The scientific basis	1/1/1992

			and regulatory scope of the Proposition 65 list of carcinogens and reproductive toxicants." Risk: Issues in Safety and Health 3 (Spring): 127-172 (1992). https://scholars.unh.edu/risk/vol3/iss2/4/	
1457			Pease, W. Strategies for Reforming Toxic Chemical Regulation: An Assessment of California's Proposition 65. Doctoral Dissertation. Graduate Division, University of California at Berkeley. (1992).	1/1/1992
1458			Weisenburger, D.O., Pathological Classification of Non-Hodgkin's Lymphoma for Epidemiological Studies. Cancer Res, 1992.52(19 Suppl): p. 5456s-5462s; discussion 5462s-5464s.	1/1/1992
1459			Atkinson, C., Martin, T., Hudson, P., and Robb, D., Glyphosate: 104 week dietary carcinogenicity study in mice. 1993: Inveresk Research International, Tranent, EH33 2NE, Scotland. IRI Project No. 438618. April 7, 1993.	1/1/1993
1460			Atkinson, C., Strutt, A., Henderson, W., et al. , 104-Week Chronic Feeding/ Oncogenicity study in rats with 52-week interim kill. 1993.	1/1/1993
1461			Bieler, G.S. and R.L. Williams, Ratio estimates, the delta method, and quantal response tests for increased carcinogenicity. Biometrics, 1993. 49(3): p. 793-801.	1/1/1993

1462			Blair A, Zahm SH. Patterns of pesticide use among farmers: implications for epidemiologic research. Epidemiology. 4(1):55-62.	1/1/1993
1463			Friedenreich, C.M., Methods for pooled analyses of epidemiologic studies. Epidemiology, 1993. 4(4): p. 295-302.	1/1/1993
1464			Hotchkiss, SA, et al., "Percutaneous absorption of 4,4'-methylene-bis (2-chloroaniline) and 4,4'methylenedianiline through rate and human skin in vitro," March, 1993, Toxicology In Vitro, Volume 7(2), pg. 141-148.	1/1/1993
1465			Office of Pesticide Programs. Reregistration eligibility decision (RED): Glyphosate US Environmental Protection Agency (EPA);1993.	1/1/1993
1466			Portier, C.J., A. Kopp-Schneider, and C.D. Sherman, Using Cell Replication Data in Mathematical-Modeling in Carcinogenesis. Environmental Health Perspectives, 1993. 101: p. 79-86.	1/1/1993
1467			Rank, J., et al., Genotoxicity testing of the herbicide Roundup and its active ingredient glyphosate isopropylamine using the mouse bone marrow micronucleus test, Salmonella mutagenicity test, and Allium anaphase-telophase test. Mutat Res, 1993. 31(1): p. 29-36.	1/1/1993
1468			Eustis, S.L., et al., The utility of multiple-section sampling in	1/1/1994

			the histopathological evaluation of the kidney for carcinogenicity studies. Toxicol Pathol, 1994. 22(5): p. 457-72.	
1469			Kopp-Schneider, A., C.J. Portier, and C.D. Sherman, The Exact Formula for Tumor-Incidence in the 2-Stage Model. Risk Analysis, 1994. 14(6): p. 1079-1080.	1/1/1994
1470			National Research Council. 1994. Science and Judgment in Risk Assessment. National Academy Press, Washington, DC. https://www.nap.edu/catalog/20025/science-and-judgment-in-risk-assessment	1/1/1994
1471			National Research Council. Science and Judgment in Risk Assessment. 1994, Washington (DC): National Academy of Sciences Press.	1/1/1994
1472			Portier, C., et al., Modeling the number and size of hepatic focal lesions following exposure to 2378-TCDD. Organohalogen Compounds, 1994. 21: p. 393-397.	1/1/1994
1473			Watts MA, liThe poisoning of New Zealand,"1994, AIT Press, Auckland. From Pesticide Action Network (PAN).	1/1/1994
1474			Bakke, J. P., Evaluation of Potential of AMPA to Induce Unscheduled DNA Synthesis in the in vitro Hepatocyte DNA Repair Assay Using the Male F-344 Rat. 5 Aug. 1994.	9/5/1994
1475			Bowman, J. H., Acute Toxicity of AMPA to Rainbow Trout	9/5/1994

			(Oncorhychus mykiss). 5 Aug. 1994.	
1476			Burgess, D. and Hicks, S. L., Acute Toxicity of AMPA to Daphnia magna. 5. Aug. 1994.	9/5/1994
1477			Holland, M. E., Results of the Analyses of AMPA in a 48-Hour Acute Study with Daphnia magna. 5 Aug. 1994.	9/5/1994
1478			Holland, M. E., Results of the Stability Analyses of AMPA (aminomethyl phosphonic acid) Test Material Used in 90-Day Dog Study at WIL Laboratories (WI-90-354). 5 Aug. 1994.	9/5/1994
1479			Holland, M. E., Results of the Stability Analyses of AMPA in a 96-Hour Acute Study with Rainbow Trout. 5 Aug. 1994.	9/5/1994
1480			Holson, J. F., A Developmental Toxicity Study of AMPA in Rats. 5 Aug. 1994. Campbell, S., et al., AMPA: An Acute Oral Toxicity with the Northern Bobwhite. 5 Aug. 1994.	9/5/1994
1481			Holson, J. F., A Dose Range-Finding Developmental Toxicity Study of AMPA in Rats. 5 Aug. 1994.	9/5/1994
1482			Kier, L, et al. Mouse Micronucleus Study of AMPA. 5 Aug. 1994. Monsanto.	9/5/1994
1483			Long, R. D., et al., AMPA: A Dietary LC 50 Study with the Mallard. 5 Aug. 1994.	9/5/1994
1484			Long, R. D., et al., AMPA: A Dietary LC 50 Study with the Northern Bobwhite. 5 Aug. 1994.	9/5/1994

1485			Schermes, S., et al., Results of the Analyses of Avian Diet Samples for AMPA (aminomethyl phosphonic acid). 5 Aug. 1994.	9/5/1994
1486			Stout, L. D., One Month Study of AMPA Administered by Capsule to Beagle Dogs. 5 Aug. 1994.	9/5/1994
1487			Tompkins, E. C., 90-Day Oral (Capsule) Toxicity Study in Dogs with AMPA, 5 Aug. 1994. Monsanto.	9/5/1994
1488			Blair A., et al. Guidelines for application of meta-analysis in environmental epidemiology. ISLI Risk Science Institute. Regul Toxicol Pharmacol. 1995 Oct;22(2): 189-97.	1/1/1995
1489			Complaint filed in DeAngelis v. Monsanto	1/1/1995
1490			Cox, c., Glyphosate Fact Sheets: Part 1, Toxicology; Part 2, Human Exposure and Ecological Effects. J Pesticide Reform, 1995a. 15(3 and 4): p. 1-27.	1/1/1995
1491			Hoover, S, L Zeise, W Pease, L Weiss, M Hennig and C Cranor. "Improving the regulation of carcinogens: A proposal to expedite the estimation of carcinogenic potency." Risk Analysis 15(2):267-280 (1995). https://onlinelibrary.wiley.com/doi/pdf/10.1111/j.1539-6924.1995.tb1320.x	1/1/1995
1492			Kale, P.G., et al., Mutagenicity testing of nine herbicides and pesticides currently used in agriculture. Environ Mol Mutagen, 1995. 25(2): p. 148-153.	1/1/1995

1493			Kopp-Schneider, A. and C.J. Portier, Carcinoma formation in NMRI mouse skin painting studies is a process suggesting greater than two stages. Carcinogenesis, 1995. 16(1): p. 53-9.	1/1/1995
1494			Alavanja MC, Sandler DP, McMaster SB, et al. The Agricultural Health Study. Environ Health Perspect. 1996 104(4):362-369.	1/1/1996
1495			Crump, K., "The linearized multi-stage model and the future of quantitative risk assessment," 1996, Hum Exp. Tox, Vol. L5(10), pg.787 -798'	1/1/1996
1496			Day, D.W., The adenoma-carcinoma sequence in colorectal neoplasia. Surg Oncol Clin N Am, 1996. 5(3): p. 513-30.	1/1/1996
1497			Gaspar, J., et al., Mutagenic activity of glycine upon nitrosation in the presence of chloride and human gastric juice: a possible role in gastric carcinogenesis. Teratog Carcinog Mutagen, 1996. 16(5): p. 275-86.	1/1/1996
1498			Matthews JN, Altman DG. Statistics Notes: Interaction 2: compare effect sizes not P values. BMJ. 1996;313(7060):808.	1/1/1996
1499			Morabia A, Stellman SD, Wynder EL. Smoking prevalence in neighborhood and hospital controls: implications for hospital-based case-control studies. J Clin Epidemiol. 49(8):885-889.	1/1/1996
1500			Portier, C.J., A. Kopp-Schneider, and C.D. Sherman,	1/1/1996

			Calculating tumor incidence rates in stochastic models of carcinogenesis. Mathematical Biosciences, 1996. 135(2): p. 129-146.	
1501			Portier, C.J., et al., Modeling the number and size of hepatic focal lesions following exposure to 2,3,7,8-TCDD. Toxicology and Applied Pharmacology, 1996. 138(1): p. 20-30.	1/1/1996
1502			Rozman, KK and Klaassen CD., "Absorption, distribution and excretion of toxicants," in Cassarett & Doull's Toxicology, The Basic Science of Poisons. 5th edition. 1996. McGraw-Hili.	1/1/1996
1503			Smith, E.A., S.L. Prues, and F.W. Oehme, Environmental degradation of polyacrylamides. 1. Effects of artificial environmental conditions: temperature, light, and pH. Ecotoxicol Environ Saf, 1996. 35(2): p. 121-35.	1/1/1996
1504			Suresh, T.P., Combined Chronic Toxicity and Carcinogenicity Study with Glyphosate Technical in Wistar Rats. 1996, Syngenta: Toxicology Department Rallis Research Centre, Rallis India Limited.	1/1/1996
1505			Treffel, P. & Gabrad, B., "Skin penetration and sun protection factor of ultraviolet filters from two vehicle," 1996, Pharmaceut Res, Vol. 13, pg. 770-774.	1/1/1996
1506			Wester, R.C., D. Quan, and H.I. Maibach, In vitro percutaneous absorption of	1/1/1996

			model compounds glyphosate and malathion from cotton fabric into and through human skin. Food Chem Toxicol, 1996. 34(8): p. 731-735.	
1507			Blakley, B. R. (1997). Effect of roundup and tordon 202C herbicides on antibody production in mice. Vet Hum Toxicol, 39(4), 204-206.	1/1/1997
1508			Bolognesi C, Bonatti S, Degan P, et al. Genotoxic activity of glyphosate and its technical formulation Roundup. Journal of Agricultural and food chemistry. 1997;45(5):1957-1962.	1/1/1997
1509			Clements, C., S. Ralph, and M. Petras, Genotoxicity of select herbicides in Rana catesbeiana tadpoles using the alkaline single-cell gel DNA electrophoresis (comet) assay. Environ Mol Mutagen, 1997. 29(3): p. 277-288.	1/1/1997
1510			Diamond, G., Durkin, P., "Effects of surfactants on the toxicity of glyphosate with specific reference to RODEO," L997, Syracuse Research Corporation	1/1/1997
1511			Enemoto, K., 24-Month Oral Chronic Toxicity and Oncogenicity Study in Rats, Vol. 1. . 1997: The Institute of Environmental Toxicology, Kodaira-shi, Tokyo, Japan.	1/1/1997
1512			Excel, Combined chronic toxicity/carcinogenicity study of glyphosate technical in Sprague Dawley rats. . 1997:	1/1/1997

			Indian Institute of Toxicology, Pune, India.	
1513			Haseman, J.K., G.A. Boorman, and J. Huff, Value of historical control data and other issues related to the evaluation of long-term rodent carcinogenicity studies. Toxicol Pathol, 1997. 25(5): p. 524-7.	1/1/1997
1514			Sartorelli, et al, 1997.	1/1/1997
1515			Smith, E.A., S.L. Prues, and F.W. Oehme, Environmental degradation of polyacrylamides. II. Effects of environmental (outdoor) exposure. Ecotoxicol Environ Saf, 1997. 37(1): p. 76-91.	1/1/1997
1516			Sugimoto, K., 18-Month Oral Oncogenicity Study in Mice, Vol. 1 and 2. . 1997: The Institute of Environmental Toxicology, 2-772, Suzuki-cho, Kodaira-shi, Tokyo, 187, Japan, Study No.:IET 94-0151.	1/1/1997
1517			Acquavella, Cancer among Farmers: A Meta-Analysis, Ann Epidemiol 1998;8:64-74.	1/1/1998
1518			Bridger RS, Sparto P, Marras WS. Spade design, lumbar motions, risk of low-back injury and digging posture. Occupational Ergonomics. 1998 1(3):157-172.	1/1/1998
1519			de Cock, J. et al., "Determinants of exposure to captan in fruit growing," L998, Am Ind Hyg Assoc J 59, 1998a, pp. t66-172 and 1998b, pg. 158-165.	1/1/1998
1520			el-Gendy KS, Aly NM, el-Sebae AH (1998). Effects of edifenphos and glyphosate on	1/1/1998

			the immune response and protein biosynthesis of bolti fish (Tilapia nilotica). J Environ Sci Health B, 33(2):135–49.	
1521			Kopp-Schneider, A., C. Portier, and P. Bannasch, A model for hepatocarcinogenesis treating phenotypical changes in focal hepatocellular lesions as epigenetic events. Math Biosci, 1998. 148(2): p. 181-204.	1/1/1998
1522			Lioi, M. B., Scarfi, M. R., Santoro, A., Barbieri, R., Zeni, O., Salvemini, F., Di Berardino, D., & Ursini, M. V. (1998). Cytogenetic damage and induction of pro-oxidant state in human lymphocytes exposed in vitro to gliphosate, vinclozolin, atrazine, and DPX-E9636. Environmental and Molecular Mutagenesis, 32(1), 39-46.	1/1/1998
1523			Lioi, M.B., et al., Genotoxicity and oxidative stress induced by pesticide exposure in bovine lymphocyte cultures in vitro. Mutat Res, 1998. 403(1-2): p. 13-20.	1/1/1998
1524			Nordstrom M, Hardell L, Magnuson A, Hagberg H, Rask-Andersen A. Occupational exposures, animal exposure and smoking as risk factors for hairy cell leukaemia evaluated in a case-control study. Br J Cancer. 1998;77(11):2048-2052.	1/1/1998
1525			Peluso, M., et al., 32P-postlabeling detection of DNA adducts in mice treated with the herbicide Roundup.	1/1/1998

			Environ Mol Mutagen, 1998. 31(1): p. 55-59.	
1526			Portier, C.J. and M.S. Wolfe, eds. Assessment of Health Effects from Exposure to Power-Line Frequency Electric and Magnetic Fields. NIH Publication Number 98-3981. 1998, National Institute of Environmental Health Sciences: Research Triangle Park, North Carolina. 508.	1/1/1998
1527			Portier, C.J. and M.S. Wolfe, eds. EMF Science Review Symposium Breakout Group Report for Clinical and In Vivo Laboratory Findings. NIH Publication Number 98-441. 1998, National Institute of Environmental Health Sciences: Research Triangle Park, North Carolina.	1/1/1998
1528			Portier, C.J. and M.S. Wolfe, eds. EMF Science Review Symposium Breakout Group Report for Epidemiology Research Findings. 1998, National Institute of Environmental Health Sciences: Research Triangle Park, North Carolina.	1/1/1998
1529			Tiefenbacher JP. Mapping the pesticide driftscape: Theoretical patterns of the drift hazard. Geographical Environment Model. 2(1):83-102.	1/1/1998
1530			Wester, R., et al., Human Cadaver Skin Viability for In	1/1/1998

			Vitro Percutaneous Absorption: Storage and Detrimental Effects of Heat-Separation and Freezing heating loses viability, Pharmaceutical Research, Vol. 15, No. 1, 1998.	
1531			Anderson, D., et al., The effect of potassium diazoacetate on human peripheral lymphocytes, human adenocarcinoma Colon caco-2 cells, and rat primary colon cells in the comet assay. Teratog Carcinog Mutagen, 1999. 19(2): p. 137-46.	1/1/1999
1532			Aspelin A, Grube AH. Pesticide Industry Sales and Usage: 1996 and 1997 Market Estimates, Office of Pesticide Programs, U.S. Environmental Protection Agency, Washington, D.C.; 1999. http://1.usa.gov/20qXcOb. Accessed 03 February 2016.	1/1/1999
1533			Aspelin AL, Grube AH, Torla R. Pesticides industry sales and usage: 1996 and 1997 market estimates. Biological and Economic Analysis Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, US Environmental Protection Agency. SAME AS 1533 ABOVE?	
1534			Benbrook, C. Evidence of the Magnitude and Consequences of the Roundup Ready Soybean Yield Drag from University- Based Varietal Trials in 1998. Ag BioTech InfoNet, 1999.	1/1/1999

1535			Blettner, M., et al., Traditional reviews, meta-analyses and pooled analyses in epidemiology. Int J Epidemiol, 1999. 28(1): p. 1-9.	1/1/1999
1536			Bronaugh, R., H. Hood, M. Kraeling, and J. Yourick, "Determination of percutaneous absorption by In Vitro techniques," 1999, pg.229-233 in Percutaneous Absorption,3rd ed., R'L' Bronaugh and H'l' Maibach, eds. New York: Marcel Dekker, Inc.	1/1/1999
1537			Goodman SN. Toward evidence-based medical statistics. 1: The P value fallacy. Ann Intern Med. 1999;130(12):995-114.	1/1/1999
1538			Hardell L, Eriksson M. A case-control study of non-Hodgkin lymphoma and exposure to pesticides. Cancer. 1999;85(6):1353-1360.	1/1/1999
1539			Simcox, N.J. et aL, "Farmworker exposure to organophosphorus pesticide residues during apple thinning in central Washington State," 1999, Am Ind Hyg Assoc J 60, pg. 752-761.	1/1/1999
1540			Ver Vers, L.M., Determination of acrylamide monomer in polyacrylamide degradation studies by high-performance liquid chromatography. J Chromatogr Sci, 1999. 37(12): p. 486-94.	1/1/1999
1541			A Case-Control Study of Non-Hodgkin Lymphoma and Exposure to Pesticides	8/15/1999
1542			Williams - Safety Evaluation and Risk Assessment of the	12/6/1999

			Herbicide Roudup and Its Active Ingredient, Glyphosate, for Humans	
1543			Buckley, et al, Pesticide Exposures in Children with Non-Hodgkin Lymphoma 89 Cancer 2315-2321 (2000)	1/1/2000
1544			Chruscielska, K.B., J.; Kita, K, et al., Glyphosate: Evaluation of chronic activity and possible far - reaching effects - Part 1. Studies on chronic toxicity. Pestycydy, 2000. 3-4: p. 10.	1/1/2000
1545			Coutinho do Nascimento A and G. C., Comparative analysis between micronuclei tests in mice and in peripheral erythrocytes of Oreochromis niloticus in evaluation of mutagenic potential of the agrotoxins deltamethrin, dicofol, glyphosate, and imazapyr. Pesticides: R Ecotoxicol E Meio Ambiente, Curitiba, 2000. 10: p. 8.	1/1/2000
1546			Giesey, J. P., Dobson, S., & Solomon, K. R., "Ecotoxicological risk assessment for Roundup herbicide,"2000, Rev. Environ. Contam. Toxico!. 167, pg. 35-120.	1/1/2000
1547			Giknis, M. and C. Clifford, Spontaneous Neoplastic Lesions in the Crl:CD-1(ICR)BR Mouse. 2000, Charles River Laboratories.	1/1/2000
1548			Gray, et al. The Federal Government's Agricultural Health Study: A Critical Review with Suggested Improvements. Human and	1/1/2000

			Ecological Risk Assessment: Vol. 6, No. 1, pp. 47-71 (2000).	
1549			Kaya, B., et al., Use of the Drosophila wing spot test in the genotoxicity testing of different herbicides. Environ Mol Mutagen, 2000. 36(1): p. 40-6.	1/1/2000
1550			Kobyłecka, J., B. Ptaszyński, and A. Zwolińska, Synthesis and Properties of Complexes of Lead(II), Cadmium(II), and Zinc(II) with N-Phosphonomethylglycine. Monatshefte für Chemie / Chemical Monthly, 2000. 131(1): p. 1-11.	1/1/2000
1551			Leaper, C. and P.J. Holloway, Adjuvants and glyphosate activity. Pest Manag Sci, 2000. 56: p. 313-319.	1/1/2000
1552			McDuffie, H.H., et al., Non-Hodgkin's Lymphoma And The Pesticide Hypothesis: Dose Response. Epidemiology 2000. 11(4): p. S115.	1/1/2000
1553			Patricia A. Rowley vs. Kmart, A.J., and Monsanto Company,,, Deposition of Dr. Daniel A. Goldstein, Editor^Editors. 2000: STATE OF NEW MEXICO COUNTY OF DONA ANA THIRD JUDICIAL DISTRICT COURT.	1/1/2000
1554			Walsh, L.P., et al., Roundup inhibits steroidogenesis by disrupting steroidogenic acute regulatory (StAR) protein expression. Environ Health Perspect, 2000. 108(8): p. 769-76.	1/1/2000
1555			Williams, G.M., R. Kroes, and I.C. Munro, Safety evaluation and risk assessment	1/1/2000

			of the herbicide Roundup and its active ingredient, glyphosate, for humans. Regul Toxicol Pharmacol, 2000. 31(2 Pt 1): p. 117-65.	
1556			Woodburn AT. Glyphosate: production, pricing and use worldwide. Pest Management Science. 2000 56(4):309-312.	1/1/2000
1557			Zendzian, R.P., "Dermal absorption of pesticides in the rat," 2000, AIHAJ, Vol. 61(4), pg. 473-83.	1/1/2000
1558			Arbuckle, T.E., Z. Lin, and L.S. Mery, An exploratory analysis of the effect of pesticide exposure on the risk of spontaneous abortion in an Ontario farm population. Environmental Health Perspectives, 2001. 109: p. 851-857.	1/1/2001
1559			Benbrook, C., Do GM crops mean less pesticide use? Pesticide Outlook, 2001. 12: p. 204-207.	1/1/2001
1560			Brammer., Glyphosate Acid: Two Year Dietary Toxicity and Oncogenicity Study in Wistar Rats. 2001: Central Toxicology Laboratory, Alderley Park Macclesfield, Cheshire, UK.	1/1/2001
1561			Chen, C.C., et al., Tumor-promoting effect of GGN-MRP extract from the Maillard reaction products of glucose and glycine in the presence of sodium nitrite in C3H10T1/2 cells. J Agric Food Chem, 2001. 49(12): p. 6063-7.	1/1/2001
1562			Hori, M., et al., Non-Hodgkin lymphomas of mice. Blood	1/1/2001

			Cells Mol Dis, 2001. 27(1): p. 2007-22.	
1563			Interactions between glyphosate and calcium salts found in water are the primary reason for adding AMS to the spray tank. (http://www.weeds.iastate.edu/mgmt/2001/glyphosateformulations.htm)	1/1/2001
1564			Kumar, D.P.S., Carcinogenicity Study with Glyphosate Technical in Swiss Albino Mice. 2001: Toxicology Department Rallis Research Centre, Rallis India Limited. Study No. TOXI: 1559.CARCI-M.	1/1/2001
1565			Schonbrunn, E. et aL, "Interaction ofthe herbicide glyphosate with its target enzyme 5-enolpyruvylshikimate 3-phosphate synthase in atomic detail," 2001, Proc Natl Acad Sci USA Feb 13;98(4), pg. 1376-1380.	1/1/2001
1566			Sperber, William H. (2001). "Hazard identification: from a quantitative to a qualitative approach". Food Control. 12: 223–228.	1/1/2001
1567			Sterne JA, Cox D, Smith GD. Sifting the evidence—what's wrong with significance tests? Another comment on the role of statistical methods. BMJ. 2001;322(7280):226-231.	1/1/2001
1568			McDuffie - NHL and Specific Pesticide Exposures in Men	11/1/2001
1569			Blair, A., et al., Reliability of reporting on life-style and agricultural factors by a sample of participants in the	1/1/2002

			Agricultural Health Study from Iowa. Epidemiology, 2002. 13(1): p. 94-9.	
1570			Brand, R.M, & Mueller, C., "Transdermal penetration of atrazine, alachlor, and trifluralin: effect of formulation," 2002, ToxicolSci., Vol' 68(1), pe. t8-23,	1/1/2002
1571			Dosemeci, M., et al., A quantitative approach for estimating exposure to pesticides in the Agricultural Health Study. Ann Occup Hyg, 2002. 46(2): p. 245-60.	1/1/2002
1572			Garry, V.F., et al., Birth defects, season of conception, and sex of children born to pesticide applicators living in the Red River Valley of Minnesota, USA. Environmental Health Perspectives, 2002. 110: p. 441-449.	1/1/2002
1573			Grisolia, C.K., A comparison between mouse and fish micronucleus test using cyclophosphamide, mitomycin C and various pesticides. Mutat Res, 2002. 518(2): p. 145-150.	1/1/2002
1574			Haefs R. et aL, "Studies on a new group of biodegradable surfactants for glyphosate," 2002, Pest Manag. Sci. 58, pg. 825-833.	1/1/2002
1575			Hardell L, Eriksson M, Nordstrom M. Exposure to pesticides as risk factor for non-Hodgkin's lymphoma and hairy cell leukemia: pooled analysis of two Swedish	1/1/2002

			casecontrol studies. Leuk Lymphoma. 2002;43(5):1043-1049.	
1576			Hoppin, J.A., et al., Accuracy of self-reported pesticide use duration information from licensed pesticide applicators in the Agricultural Health Study. J. Expo. Anal. Environ. Epidemiol., 2002. 12(5): p. 313-8.	1/1/2002
1577			Morse, H.C., 3rd, et al., Bethesda proposals for classification of lymphoid neoplasms in mice. Blood, 2002. 11(1): p. 246-58.	1/1/2002
1578			Ropeik, David (2002). Risk. New York, New York, USA: Houghton Mifflin Company.	1/1/2002
1579			Trong, l. and C. Portier. Proceedings of the Viet Nam – United States Scientific Conferences on Human Health and Environmental Effects of Agent Orange/Dioxin, Part 1 and 2. 2002. Ha Noi, Vietnam: US National Institute of Environmental Sciences and the Government of Vietnam.	1/1/2002
1580			Van Burgsteden, J. A., In vitro percutaneous absorption study with [14C]glyphosate using viable rat skin membranes, TNO Nutrition and Food Research, 2002.	1/1/2002
1581			H . Drexler, Skin protection and percutaneous absorption of chemical hazards. Received: 15 January 2002/ Accepted: 21 August 2002/ Published online: 22 May 2003.	1/15/2002

1582			Acquavella, J.F., et al., Glyphosate Biomonitoring for Farmers and Their Families: Results from the Farm Family Exposure Study. Environmental Health Perspectives, 2004. 112(3): p. 321-326.	1/1/2003
1583			Bekelman, J. et al., Scope and Impact of Financial Conflicts of Interest in Biomedical Research, 289 JAMA 454 (2003).	1/1/2003
1584			Berkson, J., Tests of significance considered as evidence , 32 Intl. J. Epidemiology 687 (2003).	1/1/2003
1585			Bolognesi, c., Genotoxicity of Pesticides: A Review of Human Biomonitoring Studies. Mutat Res, 2003. 543(3): p. 251-272.	1/1/2003
1586			Cigarette smoking and risk of non-Hodgkin lymphoma subtypes among women. British Journal of Cancer (2003) 89,2087-2092.	1/1/2003
1587			Dallegra, E., F. Digiorgio, and R. Soares, The teratogenic potential of the herbicide glyphosate- Roundup † in Wistar rats. Toxicol Lett, 2003. 142(1-2): p. 45-52.	1/1/2003
1588			De Roos, et al. Integrative Assessment of Multiple Pesticides as Risk Factors for Non-Hodgkin's Lymphoma Among Men, 60 Occup. Environ Med. 1-9 (2003).	1/1/2003
1589			Duke, S. S., Encyclopedia of Agrochemicals, 2003, John Wiley & Sons'	1/1/2003
1590			Duke, S.O., et al., Isoflavone, glyphosate, and aminomethylphosphonic acid	1/1/2003

			levels in seeds of glyphosate-treated, glyphosate-resistant soybean. Journal of Agricultural and Food Chemistry, 2003. 51: p. 340-344.	
1591			Korinth G, Geh S, Schaller KH, Drexler H., "In vitro evaluation of the efficacy of skin barrier creams and protective gloves on percutaneous absorption of industrial solvents," 2003, Int Arch Occup Environ Health, Vol. 76(5), pg. 382-6.	1/1/2003
1592			Lebailly, P, et al., 2003, Urine mutagenicity and lymphocyte DNA damage in fruit growers occupationally exposed to the fungicide captan, Occup Environ Med 2003;60:910–917.	1/1/2003
1593			Lecoutre M-P, Poitevineau J, Lecoutre B. Even statisticians are not immune to misinterpretations of Null Hypothesis Significance Tests. International Journal of Psychology. 2003;38(1):37-45.	1/1/2003
1594			Morse, H.C., 3rd, et al., B lymphoid neoplasms of mice: characteristics of naturally occurring and engineered diseases and relationships to human disorders. Adv Immunol, 2003. 81: p. 97-121.	1/1/2003
1595			Sadetzki S, Bensal D, Novikov I, Modan B. The limitations of using hospital controls in cancer etiology--one more example for Berkson's bias. Eur J Epidemiol. 18(12):1127-1131.	1/1/2003

1596			Williams, A", "Transdermal and dermal drug delivery: From theory to clinical practice," 2003, London, Pharmaceutical Press.	1/1/2003
1597			De Roos - Integrative assessment of multiple pesticides as risk factors for NHL among Men	3/27/2003
1598			Baucom, R.S. and R. Mauricio, Fitness costs and benefits of novel herbicide tolerance in a noxious weed. Proc Natl Acad Sci U S A, 2004. 101(36): p. 13386-90.	1/1/2004
1599			Benbrook, C. Genetically engineered crops and pesticide use in the United States: the first nine years. BioTech InfoNet, 2004.	1/1/2004
1600			Benbrook, C. Impacts of Genetically Engineered Crops on Pesticide Use in the United States: The First Eight Years. Ag BioTech InfoNet 2004.	1/1/2004
1601			Cogliano, V. et al. "The Science and Practice of Carcinogen Identification and Evaluation." Environmental Health Perspectives. 112(13): 1269–1274 (2004). https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1247515/	1/1/2004
1602			Complaint in Bidegain v. Monsanto	1/1/2004
1603			Conners, D.E. and M.C. Black, Evaluation of Lethality and Genotoxicity in the Freshwater Mussel Utterbackia imbecillis (Bivalvia: Unionidae) Exposed Singly and in Combination to Chemicals Used in Lawn Care.	1/1/2004

			Archives of Environmental Contamination and Toxicology, 2004. 46(3) : p. 362-71.	
1604			Coronado, GD, Thompson, B, Strong, L, Griffith, WC, and Islas, 1,, "Agricultural task and exposure to organophosphate pesticides among farm workers," 2004, Environ Health Perspect	1/1/2004
1605			Flower KB, Hoppin JA, Lynch CF, Blair A, Knott C, Shore DL et al. (2004). Cancer risk and parental pesticide application in children of Agricultural Health Study participants. Environ Health Perspect, 112(5):631–5.	1/1/2004
1606			Gigerenzer G. Mindless statistics. The Journal of Socio-Economics. 2004;33(5):587-606.	1/1/2004
1607			Glosl, S., et al., Genotoxicity and mutagenicity of melanoidins isolated from a roasted glucose-glycine model in human lymphocyte cultures, intestinal Caco-2 cells and in the Salmonella typhimurium strains TA98 and TA102 applying the AMES test. Food Chem Toxicol, 2004. 42(9): p. 1487-95.	1/1/2004
1608			Hammond, B., et al., Results of a 13 week safety assurance study with rats fed grain from glyphosate tolerant corn. Food and Chemical Toxicology, 2004. 42: p. 113-1014.	1/1/2004
1609			Han, et al., Exact Analysis of Dose Response for Multiple Correlated Binary Outcomes 60 Biometrics 2006-224 (2004)	1/1/2004

1610			Hennessy, B.T., E.O. Hanrahan, and P.A. Daly, Non-Hodgkin lymphoma: an update. Lancet Oncol, 2004. 5(6): p. 341-53.	1/1/2004
1611			Johnson, et al Operator Exposure When Applying Amenity Herbicides by All-Terrain Vehicles and Controlled Droplet Applicators;, Ann Occup. Hyg, (2004) pp1-8	1/1/2004
1612			Kato, et al., Pesticide product use and risk of non-Hodgkin lymphoma in women, Environ Health Perspect. 2004 Sep; 112(13):1275-81.	1/1/2004
1613			Kojima, Hiroyuki, Katsura, Eiji, Takeuchi, Shinji, Niiyama, Kazuhito, & Kobayashi, Kunihiko. (2004). Screening for estrogen and androgen receptor activities in 21 pesticides by in vitro reporter gene assays using Chinese hamster ovary cells. Environmental Health Perspectives, 112(5), 524-531. doi:10.1289/ehp.6649. (Mista ke in title? 200 not 21)	1/1/2004
1614			Lee WJ, Cantor KP, Berzofsky JA, Zahm SH, Blair A. Non-Hodgkin's lymphoma among asthmatics exposed to pesticides. Int J Cancer. 111(2):298-302.	1/1/2004
1615			Lueken, A., et al., Synergistic DNA damage by oxidative stress (induced by H2O2) and nongenotoxic environmental chemicals in human fibroblasts. Toxicology Letters, 2004. 147(1): p. 35-43.	1/1/2004

1616			Marc, J., Belle, R., Morales, J., Cormier, P., and Mulner-lorillon, 0., Formulated Glyphosate Activates the DNA-Response Checkpoint of the Cell Cycle Leading to the Prevention of G2/M Transition. Toxieol Sci, 2004. 82(2): p. 436-442.	1/1/2004
1617			Marc, J., Mulner-lorillon, 0., and Belle, R., Glyphosate-Based Pesticides Affect Cell Cycle Regulation. Bioi Cell, 2004. 96(3): p. 245-249.	1/1/2004
1618			Maronpot, et al. Relevance of animal carcinogenesis findings to human cancer predictions and prevention 32 Toxicol Pathol 40-8 at 41-2 (2004)	1/1/2004
1619			Piešová, Elena. (2004). The influence of different treatment length on the induction of micronuclei in bovine lymphocytes after exposure to glyphosate. Folia Veterinaria, 48, 130-134.	1/1/2004
1620			Roberts, MS et al, 2004, Factors affecting the formation of a skin reservoir for topically applied solutes, Skin Pharmacol Physiol 2004;17:3–16.	1/1/2004
1621			Son, W.C. and C. Gopinath, Early occurrence of spontaneous tumors in CD-1 mice and Sprague-Dawley rats. Toxicol Pathol, 2004. 32(4): p. 371-4.	1/1/2004
1622			Tarantino, L.M., Biotechnology Consultation Agency Response Letter BNF No. 1180, Editor^Editors. 2004.	1/1/2004
1623			Taylor, J.L., et al., Genotoxicity of melanoidin fractions	1/1/2004

			derived from a standard glucose/glycine model. J Agric Food Chem, 2004. 52(2): p. 318-23.	
1624			Thompson B. The "significance" crisis in psychology and education. The Journal of Socio-Economics. 2004;33(5):607-613.	1/1/2004
1625			Van Ravenzwaay, B. and Leibold, E., "A comparison between in vitro rat and human and in vivo rat skin absorption studies," 2004, Toxicolln Vitro., Vol. 18(2), pg. 2009-25.	1/1/2004
1626			Giknis, M & C. Clifford, Compilation of Spontaneous Neoplastic Lesions and Survival in Crl:CD® (SD) Rats from Control Groups (Mar. 2004).	3/1/2004
1627			Anderson, J.L., War on Weeds: Iowa Farmers and Growth-Regulator Herbicides. Technology and Culture, 2005. 46: p. 719-744.	1/1/2005
1628			Baldrick, P., Carcinogenicity Evaluation: Comparison of Tumor Data from Dual Control Groups in the Sprague-Dawley Rat 33 Toxicologic Pathol. 283-291. (2005)	1/1/2005
1629			De Roos AJ, Blair A, Rusiecki JA, et al. Cancer incidence among glyphosate-exposed pesticide applicators in the Agricultural Health Study. Environ Health Perspect. 2005;113(1):49-54.	1/1/2005
1630			Dill, G.M., Glyphosate-resistant crops: History, status and future. Pest Management	1/1/2005

			Science, 2005. 61: p. 2009-224.	
1631			Engel LS, Hill DA, Hoppin JA, Lubin JH, Lynch CF, Pierce J et al. (2005). Pesticide use and breast cancer risk among farmers' wives in the Agricultural Health Study. Am J Epidemiol, 161(2): 121 –35.	1/1/2005
1632			Farmer, D.R., T.L. Lash, and J.F. Acquavella, Glyphosate results revisited. Environ. Health Perspect., 2005. 113(6): p. A365-A366. author reply A366-7.	1/1/2005
1633			Fritschi, L. et al., Occupational Exposure to Pesticides and Risk of Non-Hodgkin's Lymphoma, 162 Am. J. Epidem. 849 (2005).	1/1/2005
1634			Gehin, A., et al., Vitamins C and E reverse effect of herbicide-induced toxicity on human epidermal cells HaCaT: a biochemometric approach. Int J Pharm, 2005. 288(2): p. 2009-26.	1/1/2005
1635			Giknis, M. and C. Clifford, Spontaneous Neoplastic Lesions in the Crl:CD-1(ICR)BR Mouse in Control Groups from 18 Month to 2 year Studies. 2005, Charles River Laboratories.	1/1/2005
1636			Helal, A, & Moussa, H (2005). Chromosomal aberrations induced by glyphosate isopropylamine herbicide and trials for diminuting its toxicity using some chemical inactivators and antioxidant. Veterinary Medical Journal-Giza, 53, 169-187.	1/1/2005

1637			Henriksen, B. and O. Elen, Natural Fusarium grain infection level in wheat, barley and oat after early application of fungicides and herbicides. Journal of Phytopathology, 2005. 153: p. 2004-220.	1/1/2005
1638			Jurek, et al., Proper Interpretation of Non-Differential Misclassification Effects: Expectations vs Observations 34 Int. J. Epidemiol 680-7 (2005)	1/1/2005
1639			Low, F.L., I.C. Shaw, and J.a. Gerrard, The effect of Saccharomyces cerevisiae on the stability of the herbicide glyphosate during bread leavening. Letters in Applied Microbiology, 2005. 40: p. 133-137.	1/1/2005
1640			Monroy, C.M., et al., Citotoxicidad y genotoxicidad en células humanas expuestas in vitro a glifosato. Biomédica, 2005. 25: p. 335-45.	1/1/2005
1641			Muller, A.M., et al., Epidemiology of non-Hodgkin's lymphoma (NHL): trends, geographic distribution, and etiology. Ann Hematol, 2005. 84(1): p. 1-12.	1/1/2005
1642			Peixoto, F., Comparative effects of the Roundup and glyphosate on mitochondrial oxidative phosphorylation. Chemosphere, 2005. 61(8): p. 1115-22.	1/1/2005
1643			Piešová, Elena. (2005). The effect of glyphosate on the frequency of micronuclei in bovine lymphocytes in vitro. Acta Veterinaria, 55(2).	1/1/2005

1644			Pline-Srnic, W., Technical performance of some commercial glyphosate-resistant crops. Pest Manag Sci, 2005. 61(3): p. 225-34.	1/1/2005
1645			Qaim, M. and G. Traxler, Roundup Ready soybeans in Argentina: farm level and aggregate welfare effects. Agricultural Economics, 2005. 32: p. 75-86.	1/1/2005
1646			Richard, S. et aL, "Differential effects of glyphosate and Roundup on human placental cells and aromatase," 2005, Environ Health Perspect 113(6), pg. 716-20.	1/1/2005
1647			USEPA, Guidelines for Carcinogen Risk Assessment, U.E.P. Agency, Editor. 2005: Washington DC166.	1/1/2005
1648			Vereecken, H., Mobility and leaching of glyphosate: A review. Pest Management Science, 2005. 61: p. 1139-1151.	1/1/2005
1649			Service. USDoANAS: Agricultural Chemical Usage - Field Crops and Potatoes. https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo. do?documentID=111. Accessed 03 February 2016.(multiple years).	7/1/2005
1650			Acquavella, J.F., et al., Exposure misclassification in studies of agricultural pesticides: insights from biomonitoring. Epidemiology, 2006. 17(1): p. 69-74.	1/1/2006
1651			Amer, S.M., Aly, F., Farghaly, A. , & Imbrahim, A. (2006). In vitro and in vivo evaluation of the genotoxicity of the	1/1/2006

			herbicide glyphosate in mice. Bulletin of the National Research Centre (Cairo), 31(5), 427-446.	
1652			Bonini, M.G., et al., The oxidation of 2',7'-dichlorofluorescin to reactive oxygen species: a self-fulfilling prophesy? Free Radic Biol Med, 2006. 40(6): p. 968-75.	1/1/2006
1653			Coronado, GD, et al., "Organophosphate pesticide exposure and work in pome fruit: Evidence for the take-home pesticide pathway," 2006, Environ Health Perspect	1/1/2006
1654			Dimitrov, B.D., et al., Comparative genotoxicity of the herbicides Roundup, Stomp and Reglone in plant and mammalian test systems. Mutagenesis, 2006. 21(6): p. 375-82.	1/1/2006
1655			Dimitrov, B.D., et al., Comparative genotoxicity of the herbicides Roundup, Stomp and Reglone in plant and mammalian test systems. Mutagenesis, 2006. 21(6): p. 375-82.	1/1/2006
1656			Fernandez-Cornejo, J. and M. Caswell, The First Decade of Genetically Engineered Crops in the United States. 2006.	1/1/2006
1657			Gelman A, Stern H. The difference between "significant" and "not significant" is not itself statistically significant. The American Statistician. 2006;60(4):328-331.	1/1/2006
1658			Gueguen, Y. et al., "Cytochromes P450: xenobiotic metabolism,	1/1/2006

			regulation and clinical importance," 2006, Ann Biol Clin (Paris) 64, pg. 535-548.	
1659			Heard CM, Kung D, Thomas CP, "Skin penetration enhancement of mefenamic acid by ethanol and 1,8-cineole can be explained by the "pull" effect," 2006, Int J Pharm., Vol. 321, pg. 167-170.	1/1/2006
1660			Hoekstra R, Finch S, Kiers HA, Johnson A. Probability as certainty: Dichotomous thinking and the misuse ofp values. Psychonomic Bulletin & Review. 2006;13(6):1033-1037.	1/1/2006
1661			HOLEČKOVÁ, B., EVALUATION OF THE IN VITRO EFFECT OF GLYPHOSATE-BASED HERBICIDE ON BOVINE LYMPHOCYTES USING CHROMOSOME PAINTING. Bull Vet Inst Pulawy, 2006. 50: p. 533-536.	1/1/2006
1662			Larson, R.L., et al., Influence of glyphosate on Rhizoctonia and Fusarium root rot in sugar beet. Pest Manag Sci, 2006. 62(12): p. 1182-92.	1/1/2006
1663			Lightfoot, T. et al., Polymorphisms in the oxidative stress genes, superoxide dismutase, glutathione peroxidase and catalase and risk of non-Hodgkin's lymphoma , 91 Haematologica 1222 (2006).	1/1/2006
1664			Sivikova, K. and J. Dianovsky, Cytogenetic effect of technical glyphosate on cultivated bovine peripheral lymphocytes. Int J Hyg Environ Health, 2006. 209(1): p. 15-20.	1/1/2006

1665			Toyoshiba, H., et al., Gene interaction network analysis suggests differences between high and low doses of acetaminophen. Toxicol Appl Pharmacol, 2006. 2005(3): p. 306-16.	1/1/2006
1666			Valverde, B. and J. Gressel, Dealing with the Evolution and Spread of Sorghum halepense glyphosate resistance in Argentina. 2006, Report to SENASA.	1/1/2006
1667			Wang SS , Davis S , Cerhan JR, Hartge P, Severson RK, Cozen W, Lan Q, Welch R, Chanock SJ, and Rothman N. (2006) Polymorphisms in oxidative stress genes and risk for non-Hodgkin lymphoma. Carcinogenesis vol.27 no.9 pp.1828–1834, 2006	1/1/2006
1668			Wang, S., et al., Polymorphisms in oxidative stress genes and risk for non-Hodgkin lymphoma, Carcinogenesis, 2006. 27(9): p. 1828-1834.	1/1/2006
1669			Ward, J.M., Lymphomas and leukemias in mice. Exp Toxicol Pathol, 2006. 57(5-6): p. 377-81.	1/1/2006
1670			Dallegrave, E. et al., Pre- and postnatal toxicity of the commercial glyphosate formulation in Wistar rats, Archives of Tox. Vol 81(9): 665-673.	8/13/2006
1671			Hormesis: A New Religion? Environmental Health Perspectives, Volume 114, number 111	11/1/2006
1672			Adamson, P., et al., Time trends in the registration of	1/1/2007

			Hodgkin and non-Hodgkin lymphomas in Europe. Eur J Cancer, 2007. 43(2): p. 391-401.	
1673			Amoros, I., et al., Assessment of toxicity of a glyphosate-based formulation using bacterial systems in lake water. Chemosphere, 2007. 67(11): p. 2221-8.	1/1/2007
1674			Andreadis, C. et al., Members of the glutathione and ABCtransporter families are associated with clinical outcome in patients with diffuse large B-cell lymphoma, 109 Blood J. 3409 (2007).D372	1/1/2007
1675			Benachour, N., Sipahutar, H., Moslemi, S., Gasnier, C., Travert, C., & Seralini, G. E. (2007). Time- and dose-dependent effects of roundup on human embryonic and placental cells. Archives of Environmental Contamination and Toxicology, 53(1).	1/1/2007
1676			Blair et al, Methodological Issues Regarding Confounding and Exposure Misclassification in Epidemiological Studies of Occupational Exposures 50 Am. J. Ind. Med. 199–207 (2007)	1/1/2007
1677			Brand, R. et al., "Transdermalabsorption of the herbicide 2,4-dichlorophenoxyacetic acid is enhanced by both ethanol consumption and sunscreen application," 2007, Food and ChemicalToxicology, Volume 45, Issue L, p9,93-97.	1/1/2007
1678			Casabe, N., et al., Ecotoxicological assessment of	1/1/2007

			the effects of glyphosate and chlorpyrifos in an Argentine soya field. Journal of Soils and Sediments, 2007. 7: p. 232-239.	
1679			Cavas, T. and S. Konen, Detection of cytogenetic and DNA damage in peripheral erythrocytes of goldfish (Carassius auratus) exposed to a glyphosate formulation using the micronucleus test and the comet assay. Mutagenesis, 2007. 22(4): p.263-8.	1/1/2007
1680			Curwin BD, Hein MJ, Sanderson WT, et al. Urinary pesticide concentrations among children, mothers and fathers living in farm and non-farm households in iowa. Ann Occup Hyg. 2007;51(1):53-65.	1/1/2007
1681			Curwin, B.D., et al., Pesticide dose estimates for children of Iowa farmers and non-farmers. Environmental Research, 2007. 105: p. 307-315.	1/1/2007
1682			Engels, E.A., Infectious agents as causes of non-Hodgkin lymphoma. Cancer Epidemiol Biomarkers Prev, 2007. 16(3): p. 401-4.	1/1/2007
1683			Environmental Factors in Skin Diseases (Current Problems in Dermatology, Vol. 35) (2007)	1/1/2007
1684			Gohlke, J.M. and C.J. Portier, The forest for the trees: a systems approach to human health research. Environ Health Perspect, 2007. 115(9): p. 1261-3.	1/1/2007
1685			Hokanson, R., et al., Alteration of estrogen-regulated gene expression in human cells	1/1/2007

			induced by the agricultural and horticultural herbicide glyphosate. Hum Exp Toxicol, 2007. 26(9): p. 747-52.	
1686			Korinth G, Goen T, Schaller KH, & Drexler H., "Discrepancies between different rat models for the assessment of percutaneous penetration of hazardous substances," 2007a, Archives of Toxicology 81, pg. 833-840.	1/1/2007
1687			Lan, et al., Genetic polymorphisms in the oxidative stress pathway and susceptibility to non-Hodgkin Lymphoma, Hum. Genet., 2007. 121:161-168	1/1/2007
1688			Lee WJ, Sandler DP, Blair A, Samanic C, Cross AJ, Alavanja MC (2007). Pesticide use and colorectal cancer risk in the Agricultural Health Study. Int J Cancer, 121(2):339– 46.	1/1/2007
1689			Nielsen, et al. Defense against dermal exposures is only skin deep: significantly increased penetration through slightly damaged skin. Arch Dermatol Res. 2007	1/1/2007
1690			Paz-y-Miño, César , Sánchez, María Eugenia, Arévalo, Melissa, Muñoz, María José , Witte, Tania, De-la-Carrera, Gabriela Oleas, & Leone, Paola E. (2007). Evaluation of DNA damage in an Ecuadorian population exposed to glyphosate. Genetics and Molecular Biology, 30(2), 456-460.	1/1/2007
1691			Solomon, K.R., et al., Coca and poppy eradication in Colombia: environmental and	1/1/2007

			human health assessment of aerially applied glyphosate. Rev Environ Contam Toxicol, 2007. 190: p. 43-125.	
1692			Tur E (ed): Environmental Factors in Skin Diseases. Curr Probl Dermatol. Basel, Karger, 2007, vol 35, pp 52–64	1/1/2007
1693			Waites, C.R., et al., Nonclinical safety evaluation of muraglitazar, a novel PPARalpha/gamma agonist. Toxicol Sci, 2007. 11(1): p. 248-58.	1/1/2007
1694			Ahsan, N., et al., Glyphosate-induced oxidative stress in rice leaves revealed by proteomic approach. Plant Physiol. Biochem., 2008. 46(12): p. 1062-70.	1/1/2008
1695			Borggaard, O.K. and A.L. Gimsing, Fate of glyphosate in soil and the possibility of leaching to ground and surface waters: a review. Pest management science, 2008. 64: p. 441-56.	1/1/2008
1696			Casarett & Doull 's Toxicology: The Basic Science of Poisons (8th edition). 2008.	1/1/2008
1697			Cavalcante, D.G., C.B. Martinez, and S.H. Sofia, Genotoxic effects of Roundup on the fish Prochilodus lineatus. Mutat Res, 2008. 655(1-2): p. 41-6.	1/1/2008
1698			Chevret, S., "Maximum Tolerable Dose," 2008, Wiley Stats Ref: Statistics Reference Online, DOI: LO.t0O2/ 97 8t1.t8445t12. stat07089	1/1/2008
1699			Complaint in Alcala v. Monsanto	1/1/2008

1700			Costa, M.J., et al., Oxidative stress biomarkers and heart function in bullfrog tadpoles exposed to Roundup Original. Ecotoxicology, 2008. 17(3): p. 153-63.	1/1/2008
1701			Dixon, D., et al., Summary of chemically induced pulmonary lesions in the National Toxicology Program (NTP) toxicology and carcinogenesis studies. Toxicol Pathol, 2008. 36(3): p. 428-39.	1/1/2008
1702			Duke, S.O. and S.B. Powles, Glyphosate: a once-in-a-century herbicide. Pest Manag Sci, 2008. 64(4): p. 319-25.	1/1/2008
1703			Eriksson, et al., Pesticide exposure as risk factor for non- Hodgkin lymphoma including histopathological subgroup analysis 123 Int. J. Cancer 1657-1663 (2008)	1/1/2008
1704			Eydens, W.I.F.H., et al., Genotoxic Potential of Glyphosate Formulations : Mode-of-Action Investigations. 2008: p. 1517-1523.	1/1/2008
1705			Forlani, G., et al., Biochemical bases for a widespread tolerance of cyanobacteria to the phosphonate herbicide glyphosate. Plant Cell Physiol, 2008. 49(3): p. 443-56.	1/1/2008
1706			Goldie, et al. Global Cervical Cancer: HPV Vaccination and Diagnostics. Harvard School of Public Health	1/1/2008
1707			Heydens, W.F., et al., Genotoxic potential of glyphosate formulations: mode-of-action investigations. J Agric Food Chem, 2008. 56(4): p. 1517-23.	1/1/2008

1708			Jost, P., et al., Economic comparison of transgenic and nontransgenic cotton production systems in Georgia. Agronomy Journal, 2008. 11: p. 42-51.	1/1/2008
1709			Kenneth Rothman, et al., Modern Epidemiology, Lippincott Williams & Wilkins (2008) (Textbook)	1/1/2008
1710			Malatesta, M., Perdoni, F., Santin, G., Battistelli, S., Muller, S., & Biggiogera, M. (2008). Hepatoma tissue culture (HTC) cells as a model for investigating the effects of low concentrations of herbicide on cell structure and function. Toxicology in Vitro, 22(8), 1853-1860. doi:10.1016/j.tiv.2008.09.16.	1/1/2008
1711			Rothman KJ, Greenland S, Lash TL. Modern epidemiology. 3rd ed. Philadelphia: Wolters Kluwer Health/Lippincott Williams & Wilkins; 2008.	1/1/2008
1712			Ruano-Ravina A, Perez-Rios M, Barros-Dios JM. Population-based versus hospitalbased controls: are they comparable? Gac Sanit. 2008 22(6):609-613.	1/1/2008
1713			Warwick, S.I., et al., Do escaped transgenes persist in nature? The case of an herbicide resistance transgene in a weedy Brassica rapa population. Molecular Ecology, 2008. 17: p. 1387-1395.	1/1/2008
1714			Ziliak, et al., The cult of statistical significance: How the standard error costs us jobs, justice, and lives.	1/1/2008

			University of Michigan Press; 2008.	
1715			Abass, K., Turpeinen, M., and Pelkonen, O. An evaluation of the cytochrome P450 inhibition potential of selected pesticides in human hepatic microsomes," 2009, Journal of Environmental Science and Health Part B, 44(6).	1/1/2009
1716			Anadón, A. et al., "Toxicokinetics of glyphosate and its metabolite aminomethyl phosphonic acid in rats," 2009, Toxicol Lett 190(1), pg, 91-95.	1/1/2009
1717			Anadón, A., et al., Toxicokinetics of glyphosate and its metabolite aminomethyl phosphonic acid in rats. Toxicology Letters, 2009. 190: p. 91-95.	1/1/2009
1718			Anadon, A., et al., Toxicokinetics of glyphosate and its metabolite aminomethyl phosphonic acid in rats. Toxicol. Lett., 2009. 190(1): p. 91-5.	1/1/2009
1719			Andreotti G, Freeman LE, Hou L, Coble J, Rusiecki J, Hoppin JA et al. (2009). Argicultural pesticide use and pancreatic cancer risk in the Agricultural Healty Study Cohort Int J Cancer 124: 2495-2500	1/1/2009
1720			Astiz, M., M.J. de Alaniz, and C.A. Marra, Antioxidant defense system in rats simultaneously intoxicated with agrochemicals. Environ Toxicol Pharmacol, 2009. 28(3): p. 465-73.	1/1/2009

1721			Astiz, Mariana, Alaniz, María J. T. de, & Marra, Carlos Alberto. (2009). Effect of pesticides on cell survival in liver and brain rat tissues. Ecotoxicology and Environmental Safety, 72(7), 2025-2032. doi:10.1016/j.ecoenv.2009.05.11.	1/1/2009
1722			Benachour, N. and G.E. Seralini, Glyphosate formulations induce apoptosis and necrosis in human umbilical, embryonic, and placental cells. Chem Res Toxicol, 2009. 22(1): p. 97-105.	1/1/2009
1723			Benbrook, C., Impacts of Genetically Engineered Crops on Pesticide Use : The First Thirteen Years, Editor^Editors. 2009, The Organic Center.	1/1/2009
1724			Binimelis, R., W. Pengue, and I. Monterroso, "Transgenic treadmill": Responses to the emergence and spread of glyphosate-resistant johnsongrass in Argentina. Geoforum, 2009. 40(4): p. 623-633.	1/1/2009
1725			Bolognesi C, Carrasquilla G, Volpi S, Solomon KR, Marshall EJ. Biomonitoring of genotoxic risk in agricultural workers from five colombian regions: association to occupational exposure to glyphosate. J Toxicol Environ Health A. 2009; 72(15-16):986- 997.	1/1/2009
1726			Dauer, J.T., et al., Conyza canadensis seed ascent in the lower atmosphere. Agricultural and Forest Meteorology, 2009. 149: p. 526-534.	1/1/2009

1727			de Vendômois, J.S., et al., A comparison of the effects of three GM corn varieties on mammalian health. International Journal of Biological Sciences, 2009. 5: p. 706-726.	1/1/2009
1728			Dermal absorption of pesticides - evaluation of variability and prevention," 2009, Danish Environmental Protection Agency, Pesticides Research No' L24, L3.1'	1/1/2009
1729			Dewar, A.M., Weed control in glyphosate-tolerant maize in Europe. Pest management science, 2009. 65: p. 1047-58.	1/1/2009
1730			El-Shenawy NS. Oxidative stress responses of rats exposed to Roundup and its active ingredient glyphosate. Environ Toxicol Pharmacol. 2009;28(3):379-385	1/1/2009
1731			Fernandez, M.R., et al., Glyphosate associations with cereal diseases caused by Fusarium spp. in the Canadian Prairies. European Journal of Agronomy, 2009. 31: p. 133-143.	1/1/2009
1732			Gasnier C, Dumont C, Benachour N, Clair E, Chagnon MC, Seralini GE. Glyphosatebased herbicides are toxic and endocrine disruptors in human cell lines. Toxicology. 2009;262(3):184-191.	1/1/2009
1733			Gohlke, J.M., et al., Genetic and environmental pathways to complex diseases. BMC Syst Biol, 2009. 3: p. 46.	1/1/2009
1734			Jasper, R., et al., Evaluation of biochemical, hematological	1/1/2009

			and oxidative parameters in mice exposed to the herbicide glyphosate-Roundup((R)). Interdiscip Toxicol, 2012. 5(3): p. 133-40.	
1735			Johal, G.S. and D.M. Huber, Glyphosate effects on diseases of plants. European Journal of Agronomy, 2009. 31(3): p. 144-152.	1/1/2009
1736			Johnson, W.G., et al., Influence of glyphosate-resistant cropping systems on weed species shifts and glyphosate-resistant weed populations. European Journal of Agronomy, 2009. 31: p. 162-172.	1/1/2009
1737			Kezic, S. & Nielsen, J.B, "Absorption of chemicals through compromised skin," 2009, International Archives of Occupational and Environmental Health, Vol. 82(6), pg. 677- 88.	1/1/2009
1738			Lushchak, O.V., et al., Low toxic herbicide Roundup induces mild oxidative stress in goldfish tissues. Chemosphere, 2009. 76(7): p. 932-7.	1/1/2009
1739			Mañas, F, Peralta, L, Raviolo, J, García Ovando, H, Weyers, a, Ugnia, L, Gonzalez Cid, M, Larripa, I, & Gorla, N. (2009). Genotoxicity of AMPA, the environmental metabolite of glyphosate, assessed by the Comet assay and cytogenetic tests. Ecotoxicology and Environmental Safety, 72, 834-837.	1/1/2009

			doi:10.1016/j.ecoenv.2008.09.019.	
1740			Manas, F., et al., Genotoxicity of glyphosate assessed by the comet assay and cytogenetic tests. Environ Toxicol Pharmacol, 2009. 28(1): p. 37-41. (72: p. 834-7.)	1/1/2009
1741			Mañas, Fernando, Peralta, Laura, Raviolo, José, Ovando, H. G., Weyers, Alicia, Ugnia, Laura, Cid, Marcela Gonzalez, Larripa, Irene, & Gorla, Nora. (2009). Genotoxicity of glyphosate assessed by the comet assay and cytogenetic tests. Environmental Toxicology and Pharmacology, 28, 37-41. doi:10.1016/j.etap.2009.02.11.	1/1/2009
1742			Mladinic, M., et al., Evaluation of genome damage and its relation to oxidative stress induced by glyphosate in human lymphocytes in vitro. Environ Mol Mutagen, 2009. 50(9): p. 81-7.	1/1/2009
1743			Mladinic, M., P. Perkovic, and D. Zeljezic, Characterization of chromatin instabilities induced by glyphosate, terbuthylazine and carbofuran using cytome FISH assay. Toxicol Lett, 2009. 189(2): p. 130-7.	1/1/2009
1744			National Research Council. Science and Decisions: Advancing Risk Assessment. 2009, Washington (DC): National Academies Press.	1/1/2009
1745			Nielsen et al., The Usual Suspects – Influence of Physicochemical Properties on	1/1/2009

			Lag Time, Skin Deposition, and Percutaneous Penetration of Nine Model Compounds (2009)	
1746			Orsi L, Delabre L, Monnereau A, et al. Occupational exposure to pesticides and lymphoid neoplasms among men: results of a French case-control study. Occup Environ Med. 2009;66(5):291-298.	1/1/2009
1747			Poletta, G.L., et al., Genotoxicity of the herbicide formulation Roundup (glyphosate) in broad-snouted caiman (Caiman latirostris) evidenced by the Comet assay and the Micronucleus test. Mutat Res, 2009. 672(2): p. 95-102.	1/1/2009
1748			Prasad, S., et al., Clastogenic effects of glyphosate in bone marrow cells of swiss albino mice. J Toxicol, 2009. 2009: p. 308985.	1/1/2009
1749			Raipulis, Jēkabs, Toma, Malda, & Balode, Maija. (2009). Toxicity and Genotoxicity Testing of Roundup. Proceedings of the Latvian Academy of Sciences. Section B. Natural, Exact, and Applied Sciences., 63(1-2), 29-32. doi:10.2478/v1146-19-109-6.	1/1/2009
1750			Slaninova, A., et al., A review: oxidative stress in fish induced by pesticides. Neuro.Endocrinol Lett, 2009. 30 Suppl 1: p. 2-12.	1/1/2009
1751			Solomon, K.R., E.J. Marshall, and G. Carrasquilla, Human health and environmental risks	1/1/2009

			from the use of glyphosate formulations to control the production of coca in Colombia: overview and conclusions. J Toxicol Environ Health A, 2009. 72(15-16): p. 914-20.	
1752			Stark, et al, Prospective Study of Trichomonas vaginalis Infection and Prostate Cancer Incidence and Mortality 101 JNCI 1-6 (2009)	1/1/2009
1753			Tesfamariam, T., et al., Glyphosate in the rhizosphere-Role of waiting times and different glyphosate binding forms in soils for phytotoxicity to non-target plants. European Journal of Agronomy, 2009. 31: p. 126-132.	1/1/2009
1754			Varona, M., Henao, G.L., Diaz, S., Lancheros, A., Murcia, A., Rodriguez, N., and Alvarez, V.H., Effects of Aerial Applications of the Herbicide Glyphosate and Insecticides on Human Health. Biomedica, 2009. 29(3): p. 456-475.	1/1/2009
1755			Wood, E., Dunster, J., Watson, P., and Brooks, P. , Glyphosate Technical: Dietary Carcinogenicity Study in the Mouse. 2009: Harlan Laboratories Limited, Shardlow Business Park, Shardlow, Derbyshire DE72 2GD, UK. Study No. 2060-011. April, 22, 2009.	1/1/2009
1756			Wood, E., Dunster, J., Watson, P., and Brooks, P. , Glyphosate Technical: Dietary Combined Chronic Toxicity/Carcinogenicity Study	1/1/2009

			in the Rat. 2009: Harlan Laboratories Limited, Shardlow Business Park, Shardlow, Derbyshire DE72 2GD, UK. Study No. 2060-012. April, 23, 2009.	
1757			Yamada, T., et al., Glyphosate interactions with physiology, nutrition, and diseases of plants: Threat to agricultural sustainability? European Journal of Agronomy, 2009. 31(3): p. 111-113.	1/1/2009
1758			Agricultural pesticide use and pancreatic cancer risk in the Agricultural Health Study Cohort. Int J Cancer, 124(10):2495–51 (The Authors are Andreotti et al 2009)	5/15/2009
1759			Elbaz A., Clavel J., Rathouz PJ., Moisan F., Galanaud JP., Delemotte B., Alperovitch A., Tzourio C. Professional exposure to pesticides and Parkinson disease. Ann Neurol 2009 Oct;66(4): 494-504.	10/1/2009
1760			Bernal, J., et al., Development and validation of a liquid chromatographyfluorescence-mass spectrometry method to measure glyphosate and aminomethylphosphonic acid in rat plasma. J Chromatogr. B Analyt. Technol. Biomed. Life. Sci., 2010. 878(31): p. 3290-6.	1/1/2010
1761			Dennis LK, Lynch CF, Sandler DP, Alavanja MC (2010). Pesticide use and cutaneous melanoma in pesticide applicators in the Agricultural Health Study. Environ Health Perspect, 118(6):812–7	1/1/2010

1762			Dill, G.M., et al., Glyphosate: Discovery, Development, Applications, and Properties, in Glyphosate Resistance in Crops and Weeds: History, Development, and Management, V. Nandula, Editor. 2010, John Wiley & Sons, Inc. p. 1-33.	1/1/2010
1763			Elie-Caille, C., et al., Morphological damages of a glyphosate-treated human keratinocyte cell line revealed by a micro- to nanoscale microscopic investigation. Cell Biol Toxicol, 2010. 26(4): p. 331-9.	1/1/2010
1764			Evens, et al., "Multicenter Analysis of 80 Solid Organ Transplantation Recipients With Post-Transplantation Lymphoproliferative Disease: Outcomes and Prognostic Factors in the Modern Era" Journal Of Clinical Oncology, Vol. 28, No. 6, p. 1039 (2010).	1/1/2010
1765			Ferreira, D., et al., Assessment of oxidative stress in Rhamdia quelen exposed to agrichemicals. Chemosphere, 2010. 79(9): p. 914-21.	1/1/2010
1766			Gaines, T.a., et al., Gene amplification confers glyphosate resistance in Amaranthus palmeri. Proceedings of the National Academy of Sciences of the United States of America, 2010. 107(3): p. 1029-1034.	1/1/2010
1767			Gasnier, Céline , Benachour, Nora, Clair, Emilie, Travert, Carine, Langlois, Frédéric , Laurant, Claire, Decroix-Laporte, Cécile, & Séralini,	1/1/2010

			Gilles Éric. (2010). Dig1 protects against cell death provoked by glyphosate-based herbicides in human liver cell lines. Journal of Occupational Medicine and Toxicology, 5(29).	
1768			George, J., et al., Studies on glyphosate-induced carcinogenicity in mouse skin: a proteomic approach. J Proteomics, 2010. 73(5): p. 951-64.	1/1/2010
1769			Guilherme S, Gaivão I, Santos MA, Pacheco M (2010). European eel (Anguilla anguilla) genotoxic and pro-oxidant responses following short-term exposure to Roundup–a glyphosate-based herbicide. Mutagenesis, 25(5):523–30.	1/1/2010
1770			Guilherme, S., et al., European eel (Anguilla anguilla) genotoxic and pro-oxidant responses following short-term exposure to Roundup--a glyphosate-based herbicide. Mutagenesis, 2010. 25(5): p. 523-30.	1/1/2010
1771			Harper, M.S., et al., Toxicology studies with N-acetylglycine. Food Chem Toxicol, 2010. 48(5): p. 1321-7.	1/1/2010
1772			Kojima, Endocrine-disrupting Potential of Pesticides via Nuclear Receptors and Aryl Hydrocarbon Receptor. Journal of Health Science, 2010. 56(4): p. 374-386.	1/1/2010
1773			Lancaster, S.H., et al., Effects of repeated glyphosate applications on soil microbial community composition and	1/1/2010

			the mineralization of glyphosate. Pest Manag Sci, 2010. 66(1): p. 59-64.	
1774			Lukaszewicz-Hussain, A., Role of Oxidative Stress in Organophosphate Insecticide Toxicity -Short Review. Pesticide Biochemistry and Physiology, 2010. 98(2): p. 145-150.	1/1/2010
1775			Mamy, L., B. Gabrielle, and E. Barriuso, Comparative environmental impacts of glyphosate and conventional herbicides when used with glyphosate-tolerant and non-tolerant crops. Environmental pollution (Barking, Essex : 1987), 2010. 158: p. 3172-8.	1/1/2010
1776			Meyer, D.E. and C. Cederberg, Pesticide use and glyphosate-resistant weeds – a case study of Brazilian soybean production, Editor^Editors. 2010, Sik. p. 54.	1/1/2010
1777			Modesto, K.A. and C.B. Martinez, Roundup causes oxidative stress in liver and inhibits acetylcholinesterase in muscle and brain of the fish Prochilodus lineatus. Chemosphere, 2010. 78(3): p. 294-9.	1/1/2010
1778			Modesto, Kathya A., & Martinez, Cláudia B. R. (2010). Effects of Roundup Transorb on fish: Hematology, antioxidant defenses and acetylcholinesterase activity. Chemosphere, 81(6), 781-787. doi:10.1016/j.chemosphere.2010.07.15.	1/1/2010
1779			Montgomery et al. "Characteristics of	1/1/2010

			nonparticipation and potential for selection bias in a prospective cohort study." 53 Am J Ind Med 486-496 (2010)	
1780			Morse, H.C., 3rd, J.M. Ward, and M.A. Teitell, Mouse models of human B lymphoid neoplasms, in The Lymphoid Neoplasms, I.T. Magrath, Editor. 2010, CRC Press: Boca Raton, FL.	1/1/2010
1781			Neupane B, Walter SD, Krueger P, Loeb M. Community controls were preferred to hospital controls in a case-control study where the cases are derived from the hospital. J Clin Epidemiol. 63(8):926-931.	1/1/2010
1782			Paganelli, A., et al., Glyphosate-based herbicides produce teratogenic effects on vertebrates by impairing retinoic acid signaling. Chemical research in toxicology, 2010. 23: p. 1586-95.	1/1/2010
1783			Portier, C.J., et al., A Human Health Perspective on Climate Change, N.I.o.E.H.S. Health and Human Services, Editor. 2010, Environmental Health Perspectives: Research Triangle Park, NC72.	1/1/2010
1784			Powles, S.B., Gene amplification delivers glyphosate-resistant weed evolution. Proc Natl Acad Sci U S A, 2010. 107(3): p. 955-6.	1/1/2010
1785			Saes Zobiole, L.H., et al., Water use efficiency and photosynthesis of glyphosate-resistant soybean as affected	1/1/2010

			by glyphosate. Pesticide Biochemistry and Physiology, 2010. 97: p. 182-193.	
1786			Tudisco, R., et al., Fate of transgenic DNA and evaluation of metabolic effects in goats fed genetically modified soybean and in their offsprings. Animal, 2010. 4: p. 1662-1671.	1/1/2010
1787			Waltz, E., Glyphosate resistance threatens Roundup hegemony. Nat Biotechnol, 2010. 28(6): p. 537-8.	1/1/2010
1788			Weichenthal, et al., A Review of Pesticide Exposure and Cancer Incidence in the Agricultural Health Study Cohort 118 Environ. Health Perspect. 1117-1125 (2010)	1/1/2010
1789			Wright, T.R., et al., Robust crop resistance to broadleaf and grass herbicides provided by aryloxyalkanoate dioxygenase transgenes. Proc Natl Acad Sci U S A, 2010. 107(47): p. 20240-5.	1/1/2010
1790			Yamazaki, K., A. Dialynas, and J. Cullen, Strategic Report for Monsanto Company, 2010.	1/1/2010
1791			Zobiole, L.H.S., et al., Effect of glyphosate on symbiotic N2 fixation and nickel concentration in glyphosate-resistant soybeans. Applied Soil Ecology, 2010. 44: p. 176-180.	1/1/2010
1792			Zobiole, L.H.S., et al., Glyphosate affects lignin content and amino acid production in glyphosate-resistant soybean. Acta Physiologiae Plantarum, 2010. 32: p. 831-837.	1/1/2010

1793			Zobiole, L.H.S., et al., Glyphosate affects seed composition in glyphosate-resistant soybean. Journal of agricultural and food chemistry, 2010. 58: p. 4517-22.	1/1/2010
1794			Mongtomery MP., et al. Characteristics of non-participation and potential for selection bias in a prospective cohort study. Am J Ind Med. 2010 May; 53(5): 486-496.	5/1/2010
1795			Adler, J., The growing menace from superweeds: Pigweed, ragweed and other monsters have begun to outsmart the advanced technologies that protect the biggest U.S. cash crops. Scientific American, 2011: p. 74-79.	1/1/2011
1796			Alvarez-Moya, C., et al., Evaluation of genetic damage induced by glyphosate isopropylamine salt using Tradescantia bioassays. Genet.Mol Biol, 2011. 34(1): p.127-130.	1/1/2011
1797			Antoniou, M., et al., Roundup and birth defects: Is the public being kept in the dark?	1/1/2011
1798			Aris, A. and S. Leblanc, Maternal and fetal exposure to pesticides associated to genetically modified foods in Eastern Townships of Quebec, Canada. Reproductive toxicology, 2011. 31: p. 528-33.	1/1/2011
1799			Avila-Garcia, W.V. and C. Mallory-Smith, Glyphosate-Resistant Italian Ryegrass (Lolium perenne)Populations also Exhibit Resistance to	1/1/2011

			Glufosinate. Weed Science, 2011. 59: p. 305-309.	
1800			Beckie, H.J., Herbicide-resistant weed management : focus on glyphosate. Society of Chemical Industry, 2011: p. 1037-1048.	1/1/2011
1801			Bigler, F. and R. Albajes, Indirect effects of genetically modified herbicide tolerant crops on biodiversity and ecosystem services: the biological control example. Journal für Verbraucherschutz und Lebensmittelsicherheit, 2011. 6(S1): p. 79-84.	1/1/2011
1802			Bolognesi, C., Micronuclei and Pesticide Exposure, 26 Mutagenesis 19-26 (2011)	1/1/2011
1803			Camberato, J., et al., Glyphosate ' s Impact on Field Crop Production and Disease Development. Plant Pathology, 2011.	1/1/2011
1804			Cattaneo, R., et al., Toxicological responses of Cyprinus carpio exposed to a commercial formulation containing glyphosate. Bull Environ Contam Toxicol, 2011. 87(6): p. 597-602.	1/1/2011
1805			Cavusoglu, K., et al., Protective effect of Ginkgo biloba L. leaf extract against glyphosate toxicity in Swiss albino mice. J Med Food, 2011. 14(10): p. 1263-72.	1/1/2011
1806			Chang, F.C., M.F. Simcik, and P.D. Capel, Occurrence and fate of the herbicide glyphosate and its degradate aminomethylphosphonic acid in the atmosphere. Environmental Toxicology and	1/1/2011

			Chemistry, 2011. 30: p. 548-555.	
1807			de Menezes, C.C., et al., Roundup effects on oxidative stress parameters and recovery pattern of Rhamdia quelen. Arch Environ Contam Toxicol, 2011. 60(4): p. 665-71.	1/1/2011
1808			Duke, S.O., Comparing conventional and biotechnology-based pest management. Journal of agricultural and food chemistry, 2011. 59: p. 5793-8.	1/1/2011
1809			Felix, J., R. Boydston, and I.C. Burke, Potato Response to Simulated Glyphosate Drift. Weed Technology, 2011. 25: p. 637-644.	1/1/2011
1810			Giknis, M. and C. Clifford. Neoplastic and Non-Neoplastic Lesions in the Charles River Wistar Hannover [Crl:WI(Han)] Rat. 2011; Available from: http://www.criver.com/files/pdfs/rms/wistarhan/rm_rm_r_wistar_han_tox_data_2011.aspx.	1/1/2011
1811			Glusczak, L., et al., Acute exposure to glyphosate herbicide affects oxidative parameters in piava (Leporinus obtusidens). Arch Environ Contam Toxicol, 2011. 61(4): p. 624-30.	1/1/2011
1812			Gohlke, J.M., et al., Estimating the global public health implications of electricity and coal consumption. Environ Health Perspect, 2011. 119(6): p. 821-6.	1/1/2011
1813			Gray, M.E., Relevance of traditional integrated pest management (IPM) strategies	1/1/2011

			for commercial corn producers in a transgenic agroecosystem: a bygone era? J Agric Food Chem, 2011. 59(11): p. 5852-8.	
1814			Green, M.D., Freedman, D.M., and Gordis, L., Reference Guide on Epidemiology In: Reference Manual on Scientific Evidence: Third Edition. The National Academies Press, 2011: p. 597-606.	1/1/2011
1815			Grube, A., et al., Pesticides Industry Sales and Usage: 2006 and 2007 Market Estimates. 2011.	1/1/2011
1816			Guidance Notes on Dermal Absorption, OECD Environment, Health and Safety Publications, Series on Testing and Assessment No. 156. ENV/JM/MONO(2011)36.	1/1/2011
1817			Hanahan, D. and R.A. Weinberg, Hallmarks of cancer: the next generation. Cell, 2011. 144(5): p. 646-74.	1/1/2011
1818			Higgins, J.P.T. and S. Green, Cochrane Handbook for Systematic Reviews of Interventions. 2011, The Cochrane Collaboration.	1/1/2011
1819			Hohenadel K, Harris SA, McLaughlin JR, et al. Exposure to multiple pesticides and risk of non-Hodgkin lymphoma in men from six Canadian provinces. Int J Environ Res Public Health. 2011;8(6):2320-2330.	1/1/2011
1820			Jaeschke, B.C., et al., Tissue-specific incorporation and genotoxicity of different forms of tritium in the marine mussel, Mytilus edulis. Environ	1/1/2011

			Pollut, 2011. 159(1): p. 274-280.	
1821			Kremer, R.J., Glyphosate Interactions Beyond Weed Control : Current State of Knowledge, Editor^Editors. 2011, Columbia, MO.	1/1/2011
1822			Kreutz LC, Gil Barcellos LJ, de Faria Valle S, de Oliveira Silva T, Anziliero D, Davi dos Santos E et al. (2011). Altered hematological and immunological parameters in silver catfish (Rhamdia quelen)following short term exposure to sublethal concentration of glyphosate. Fish Shellfish Immunol, 30(1):51–7.	1/1/2011
1823			Mink, P.J., et al., Epidemiologic studies of glyphosate and non-cancer health outcomes: a review. Regul Toxicol Pharmacol, 2011. 61(2): p. 172-84.	1/1/2011
1824			Mohamed, A.H., Sublethal toxicity of Roundup to immunological and molecular aspects of Biomphalaria alexandrina to Schistosoma mansoni infection. Ecotoxicol Environ Saf, 2011. 74(4): p. 754-60.	1/1/2011
1825			Ortiz-Ordonez, E., et al., Effect of Yerbimat herbicide on lipid peroxidation, catalase activity, and histological damage in gills and liver of the freshwater fish Goodea atripinnis. Arch Environ Contam Toxicol, 2011. 61(3): p. 443-52.	1/1/2011
1826			Paz-y-Miño, C., et al., Baseline determination in social,	1/1/2011

			health, and genetic areas in communities affected by glyphosate aerial spraying on the northeastern Ecuadorian border. Reviews on Environmental Health, 2011. 26(1) : p. 45-51.	
1827			Poletta, G.L., et al., Genetic, enzymatic and developmental alterations observed in Caiman latirostris exposed in ovo to pesticide formulations and mixtures in an experiment simulating environmental exposure. Ecotoxicol Environ Saf, 2011. 74(4): p. 852-9.	1/1/2011
1828			Riar, D.S., et al., Glyphosate Resistance in a Johnsongrass (Sorghum halepense) Biotype from Arkansas. Weed Science, 2011. 59: p. 299-304.	1/1/2011
1829			Saltmiras, D., et al., Letter to the Editor Regarding the Article by Paganelli et al. Chemical Research in Toxicology, 2011. 24(5): p. 607-608.	1/1/2011
1830			Soukup, J., et al., Environmental and agronomic monitoring of adverse effects due to cultivation of genetically modified herbicide tolerant crops. Journal fur Verbraucherschutz und Lebensmittelsicherheit, 2011. 6: p. 125-130.	1/1/2011
1831			Tranel, P.J., et al., Herbicide resistances in Amaranthus tuberculatus: A call for new options. Journal of Agricultural and Food Chemistry, 2011. 59: p. 5808-5812.	1/1/2011
1832			Truta, Elena, Vochita, Gabriela , Rosu, Craita , Zamfirache,	1/1/2011

			Maria-Magdalena , & Olteanu, Zenovia (2011). Evaluation of roundup-induced toxicity on genetic material and on length growth of barley seedlings. Acta Biologica Hungarica, 62(3), 290-301. doi:10.1556/ABiol.62.2011.3.8 .	
1833			Blair A., et al. Impact of Pesticide Exposure Misclassification on Estimates of Relative Risks in the Agricultural Health Study. Occup Environ Med. 2011 July; 68(7): 537-541.	7/1/2011
1834			Bhatia, Long-term health impacts of hematopoietic stem cell transplantation inform recommendations for follow-up. Expert Rev Hematol. 2011 Aug;4(4):437-52	8/1/2011
1835			Williams - Developmental and Reproductive Outcomes in Humans and Animals after Glyphosate Exposure: A Critical Analysis	12/27/2011
1836			Akcha, F., C. Spagnol, and J. Rouxel, Genotoxicity of diuron and glyphosate in oyster spermatozoa and embryos. Aquat Toxicol, 2012. 106-107: p. 104-13.	1/1/2012
1837			Antoniou, M., et al., Teratogenic Effects of Glyphosate-Based Herbicides: Divergence of Regulatory Decisions from Scientific Evidence. Journal of Environmental & Analytical Toxicology, 2012. 01(S4).	1/1/2012
1838			Aris, A., Response to comments from Monsanto	1/1/2012

			scientists on our study showing detection of glyphosate and Cry1Ab in blood of women with and without pregnancy. Reproductive Toxicology, 2012. 33(1): p. 122-123.	
1839			Astiz, M., M.J. de Alaniz, and C.A. Marra, The oxidative damage and inflammation caused by pesticides are reverted by lipoic acid in rat brain. Neurochem Int, 2012. 61(7): p. 1231-41.	1/1/2012
1840			Belle, R., et al., Letter to the editor: toxicity of Roundup and glyphosate, Editor^Editors. 2012. p. 233-5; author reply 236-7.	1/1/2012
1841			Benbrook, C., Impacts of genetically engineered crops on pesticide use in the U.S. -- the first sixteen years. Environmental Sciences Europe, 2012. 24: p. 24.	1/1/2012
1842			Chen, L., et al., The combined effects of UV-B radiation and herbicides on photosynthesis, antioxidant enzymes and DNA damage in two bloom-forming cyanobacteria. Ecotoxicol Environ Saf, 2012. 80: p. 224-30.	1/1/2012
1843			Christoffers, J.S.a.M., Areas and counties of ND and MN having known and suspected glyphosate-resistant weeds, Editor^Editors. 2012.	1/1/2012
1844			Clair, E., et al., A glyphosate-based herbicide induces necrosis and apoptosis in mature rat testicular cells in	1/1/2012

			vitro, and testosterone decrease at lower levels. Toxicology in vitro : an international journal published in association with BIBRA, 2012. 26: p. 269-79.	
1845			Complaint in Hall v. Monsanto	1/1/2012
1846			Complainti in McAllister v. Monsanto	1/1/2012
1847			Coupe, R.H., et al., Fate and transport of glyphosate and aminomethylphosphonic acid in surface waters of agricultural basins. Pest management science, 2012. 68: p. 16-30.	1/1/2012
1848			Culbreth, Megan E., Harrill, Joshua A., Freudenrich, Theresa M., Mundy, William R., & Shafer, Timothy J. (2012). Comparison of chemical-induced changes in proliferation and apoptosis in human and mouse neuroprogenitor cells. NeuroToxicology, 33(6), 1499-1510. doi:https://doi.org/10.1016/j.neuro.2012.05.012. http://www.sciencedirect.com/science/article/pii/S0161813X12001271.	1/1/2012
1849			Defarge, N., et al., Letter to the editor: developmental and reproductive outcomes of roundup and glyphosate in humans and animals. J Toxicol Environ Health B Crit Rev, 2012. 15(7): p. 433-7; author reply 438-40.	1/1/2012
1850			Dupraz, E., Monsanto And The Quasi-Per Se Illegal Rule For Bundled Discounts. Vermont	1/1/2012

			Law Review, 2012. 37: p. 203-237.	
1851			Fisher, M., Many Little Hammers: Diversified Management Fighting Weed Resistance with. CSA News, 2012. September 2012.	1/1/2012
1852			Forgacs, A. L., Ding, Q., Jaremba, R. G., Huhtaniemi, I. T., Rahman, N. A., & Zacharewski, T. R. (2012). BLTK1 murine Leydig cells: a novel steroidogenic model for evaluating the effects of reproductive and developmental toxicants. Toxicology Science, 127(2), 391-402. doi:10.1093/toxsci/kfs121. https://www.ncbi.nlm.nih.gov/pubmed/22461451.	1/1/2012
1853			Greenland S. Nonsignificance plus high power does not imply support for the null over the alternative. Ann Epidemiol. 2012;22(5):364-368.	1/1/2012
1854			Guilherme, S., et al., Differential genotoxicity of Roundup((R)) formulation and its constituents in blood cells of fish (Anguilla anguilla): considerations on chemical interactions and DNA damaging mechanisms. Ecotoxicology, 2012. 21(5): p. 1381-90.	1/1/2012
1855			Guilherme, S., et al., DNA damage in fish (Anguilla anguilla) exposed to a glyphosate-based herbicide -- elucidation of organ-specificity and the role of	1/1/2012

			oxidative stress. Mutat Res, 2012. 743(1-2): p. 1-9.	
1856			Haas, M. C. Immunotoxicity Study in Female B6C3F1 Mice. WIL Research Laboratory. 21 Mar. 2012.	1/1/2012
1857			Heltshe SL, Lubin JH, Koutros S, Coble JB, Ji BT, Alavanja MC, Blair A, Sandler DP, Hines CJ, Thomas KW, Barker J, Andreotti G, Hoppin JA, Beane Freeman LE. Using multiple imputation to assign pesticide use for non-responders in the follow-up questionnaire in the Agricultural Health Study. J Expo Sci Environ Epidemiol. 2012 Jul;22(4):409-16. doi: 10.1038/jes.2012.31. Epub 2012 May 9.	1/1/2012
1858			Heu C, Berquand A, Elie-Caille C, Nicod L., "Glyphosateinduced stiffening of HaCat keratinocytes, a Peak Force Tapping study in living cells", 2012, J Struc Biol 178, pg. 1-7.	1/1/2012
1859			Heu, C., et al., "A step further toward glyphosate-induced epidermal cell death: Involvement of mitochondrial and oxidative mechanisms," 2012, Environmental Toxicology and Pharmacology 34.	1/1/2012
1860			Kalyanaraman, B., et al., Measuring reactive oxygen and nitrogen species with fluorescent probes: challenges and limitations. Free Radic Biol Med, 2012. 52(1): p. 1-6.	1/1/2012
1861			Karunanayake CP, Spinelli JJ, McLaughlin JR, Dosman JA,	1/1/2012

			Pahwa P, McDuffie HH (2012). Hodgkin lymphoma and pesticides exposure in men: a Canadian case-control study. J Agromed, 17(1):30–9.	
1862			Koller, V.J., et al., Cytotoxic and DNA-damaging properties of glyphosate and Roundup in human-derived buccal epithelial cells. Arch Toxicol, 2012. 86(5): p. 805-13.	1/1/2012
1863			Lesmes-Fabian, c., Garcia-Santos, G., Leuenberger, F., Nuyttens, D., & Binder, C. R, "Dermal exposure assessment of pesticide use: The case of sprayers in potato farms in the Colombian highlands," 2012, Science of the Total Environment, 430, pg. 202-208.	1/1/2012
1864			Lesmes-Fabian, et al, Dermal exposure assessment of pesticide use: The case of sprayers in potato farms in the Columbian highlands; Science of the Total Environment 430 (2012) 202-208	1/1/2012
1865			Lew MJ. Bad statistical practice in pharmacology (and other basic biomedical disciplines): you probably don't know P. Br J Pharmacol. 2012;166(5):1559-1567.	1/1/2012
1866			López, S.L., et al., Pesticides used in South American GMO-based agriculture. A review of their effects on humans and animal models. Advances in Molecular Toxicology, 2012. 6: p. 41-75.	1/1/2012
1867			Martini, Claudia N., Gabrielli, Matías, & Vila, María del C.	1/1/2012

			(2012). A commercial formulation of glyphosate inhibits proliferation and differentiation to adipocytes and induces apoptosis in 3T3-L1 fibroblasts. Toxicology in Vitro, 26(6), 117-1013. doi:10.1016/j.tiv.2012.04.017.	
1868			McQueen, H. et al., Estimating maternal and prenatal exposure to glyphosate in the community setting, Int. J. Hygiene and Envir. Health Vol 2005(6), Nov. 2012: 570-576.	1/1/2012
1869			Mesnage, Glyphosate Exposure in a Farmer's Family, Journal of Envoronmental Protection, 2012, 3, 111-113	1/1/2012
1870			Mink, P.J., et al., Epidemiologic studies of glyphosate and cancer: a review. Regul. Toxicol. Pharmacol., 2012. 63(3): p. 440-52.	1/1/2012
1871			Mortensen, D.a., et al., Navigating a Critical Juncture for Sustainable Weed Management. BioScience, 2012. 62: p. 75-84.	1/1/2012
1872			Munier, D.J., K.L. Brittan, and W.T. Lanini, Seed bank persistence of genetically modified canola in California. Environ Sci Pollut Res Int, 2012. 19(6): p. 2281-4.	1/1/2012
1873			OECD, Guidance Document 116 on the Conduct and Design of Chronic Toxicity and Carcinogenicity Studies, H.a.S.P. Environment, Editor. 2012, OECD: Paris.	1/1/2012
1874			Haseman, J.K., Statistical issues in the design, analysis and interpretation of animal carcinogenicity studies.	1/1/2012

			Environ Health Perspect, 1984. 58: p. 385-92.	
1875			Romano, M.A., et al., Glyphosate impairs male offspring reproductive development by disrupting gonadotropin expression. Arch Toxicol, 2012. 86(4): p. 663-73.	1/1/2012
1876			Save our Crops Coalition, Comment on EPA New Use Registration of 2,4-D Choline Salt for 2,4-D Tolerant Corn and Soybeans, Editor^Editors. 2012. p. 1-16.	1/1/2012
1877			Seralini, G.E., et al., Long term toxicity of a Roundup herbicide and a Rounduptolerant genetically modified maize. Food Chem Toxicol, 2012. 50(11): p. 4221-31.	1/1/2012
1878			Siddiqui, Sazada, Meghvansi, Mukesh K., & Khan, Shoukat Saeed. (2012). Glyphosate, Alachor and Maleic Hydrazide have Genotoxic Effect on Trigonella foenum-graecum L. Bulletin of Environmental Contamination and Toxicology, 88(5), 659-665. doi:10.117/s1128-012-0570-6.	1/1/2012
1879			Stachler, J., Preserving the Effectiveness of Herbicides and Herbicide Technology Traits – Especially Glyphosate and RR Crops, Editor^Editors. 2012.	1/1/2012
1880			Steckel, L., Glyphosate-Resistant Weeds : Lessons Learned in Tennessee Lessons Learned :, Editor^Editors. 2012, Ames, IA: Iowa Soybean	1/1/2012

			Association, On-Farm Network® Conference.	
1881			Szekacs, a. and B. Darvas, Environmental and Ecological Aspects of First Generation Genetically Modified Crops Regarding Their Impacts in a European Maize Producer Country. International Journal of Environmental Protection, 2012. 2: p. 9.	1/1/2012
1882			Szekacs, A. and B. Darvas, Forty Years with Glyphosate, in Herbicides - Properties, Synthesis and Control of Weeds. 2012. p. 247-284.	1/1/2012
1883			Thompson, H., War on weeds loses ground. Nature, 2012. 485(7399): p. 430.	1/1/2012
1884			Wang, G., et al., Damage to DNA caused by UV-B radiation in the desert cyanobacterium Scytonema javanicum and the effects of exogenous chemicals on the process. Chemosphere, 2012. 88(4): p. 413-7.	1/1/2012
1885			Williams, et aL (2012): Developmental and Reproductive Outcomes in Humans and Animals After Glyphosate Exposure: A Critical Analysis, Journal of Toxicology and Environmental Health, Part B: Critical Reviews, 15:1, 39-96.	1/1/2012
1886			Food and Chemical Toxicology: Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize	9/19/2012
1887			Long term toxicity of a Roundup herbicide and a	9/19/2012

			Roundup-tolerant genetically modified maize	
1888			RETRACTED: Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize	9/19/2012
1889			Letter to the editor: Food and Chemical Toxicology	11/7/2012
1890			Alavanja, et al, Increased Cancer Burden Among Pesticide Applicators and Others Due to Pesticide Exposure 20 CA Cancer J. Clin. 120-142 (2013)	1/1/2013
1891			Allison, J.E., C. Boutin, and D. Carpenter, Influence of soil organic matter on the sensitivity of selected wild and crop species to common herbicides. Ecotoxicology, 2013. 22(8): p. 1289-302.	1/1/2013
1892			Alvanja - Increased Cancer Burden Among Pesticide Applicatiors and Others Due to Pesticide Exposure	1/1/2013
1893			Aylward, L.L., et al., Evaluation of biomonitoring data from the CDC National Exposure Report in a risk assessment context: perspectives across chemicals. Environ Health Perspect, 2013. 121(3): p. 287-94.	1/1/2013
1894			Benedetti, D., Nunes, E., Sarmento, M., Porto, c., Dos Santos, C.E., Dias, J.F., and da Silva, J., Genetic Damage in Soybean Workers Exposed to Pesticides: Evaluation with the Comet and Buccal Micronucleus Cytome Assays. Mutat Res, 2013. 752{1-2): p. 28-33.	1/1/2013

1895			BfR, G.F.I.f.R.A., Glyphosate Renewal Assessment Report: Toxicology and Metabolism. 2013. V. 3. p.	1/1/2013
1896			Birnbaum, L.S., et al., Implementing systematic review at the National Toxicology Program: status and next steps. Environ Health Perspect, 2013. 121(4): p. A108-9.	1/1/2013
1897			Brookes, G. and G. Barfoot, The global income and production effects of genetically modified (GM) crops 1996–2011. GM Crops and Food: Biotechnology in Agriculture and the Food Chain, 2013. 4(1): p. 74-83.	1/1/2013
1898			Chuhra, M., Comment to OPP Docket: Objection on US-EPA Final Rule under FDCA section 408(g), 21 U.S.C. 346a and request for hearing on objections. 2013.	1/1/2013
1899			Cocco P, Satta G, Dubois S, et al. Lymphoma risk and occupational exposure to pesticides: results of the Epilymph study. Occup Environ Med. 2013;70(2):91-98.	1/1/2013
1900			Cuhra, M., T. Traavik, and T. Bøhn, Clone- and age-dependent toxicity of a glyphosate commercial formulation and its active ingredient in Daphnia magna. Ecotoxicology, 2013. 22: p. 251-262.	1/1/2013
1901			Darmency, H., Pleiotropic effects of herbicide-resistance genes on crop yield: A review.	1/1/2013

			Pest Management Science, 2013. 69: p. 897-904.	
1902			de Castilhos Ghisi, N. and M.M. Cestari, Genotoxic effects of the herbicide Roundup((R)) in the fish Corydoras paleatus (Jenyns 1842) after short-term, environmentally low concentration exposure. Environ Monit Assess, 2013. 185(4): p. 3201-7.	1/1/2013
1903			De Souza Filho, J., et al., Mutagenicity and genotoxicity in gill erythrocyte cells of Poecilia reticulata exposed to a glyphosate formulation. Bull Environ Contam Toxicol, 2013. 91(5): p. 583-7.	1/1/2013
1904			Ferraro, D.O. and C.M. Ghersa, Fuzzy assessment of herbicide resistance risk: Glyphosate-resistant johnsongrass, Sorghum halepense (L.) Pers., in Argentina's croplands. Crop Protection, 2013. 51: p. 32-39.	1/1/2013
1905			Food and Chemical Toxicology: Retraction notice to "Long term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize" [Food Chem. Toxicol. 50 (2012) 4221-4231]	1/1/2013
1906			Frescura, V. D., Kuhn, A. W., Laughinghouse, H. D. th, Paranhos, J. T., & Tedesco, S. B. (2013). Post-treatment with plant extracts used in Brazilian folk medicine caused a partial reversal of the antiproliferative effect of glyphosate in the Allium cepa test. Biocell, 37(2), 23-28.	1/1/2013

1907			George, J. and Y. Shukla, Emptying of Intracellular Calcium Pool and Oxidative Stress Imbalance Are Associated with the Glyphosate-Induced Proliferation in Human Skin Keratinocytes HaCaT Cells. ISRN Dermatol, 2013. 2013: p. 825180.	1/1/2013
1908			Geret, F., et al., Effects of low-dose exposure to pesticide mixture on physiological responses of the Pacific oyster, Crassostrea gigas. Environ Toxicol, 2013. 28(12): p. 689-99.	1/1/2013
1909			Gholami-Seyedkolaei, S.J., et al., Optimization of recovery patterns in common carp exposed to roundup using response surface methodology: evaluation of neurotoxicity and genotoxicity effects and biochemical parameters. Ecotoxicol Environ Saf, 2013. 98: p. 152-61.	1/1/2013
1910			Gupta, R. et al., 2013, "Agricultural Chemicals", Haschek and Rousseaux's Handbook of Toxicologic Pathology, Third Edition. http://dx.doi.org/10.1016/B978-0-12-415759-0.1042-X	1/1/2013
1911			Ji, C., et al., Proteomic and metabolomic analysis of earthworm Eisenia fetida exposed to different concentrations of 2,2',4,4'-tetrabromodiphenyl ether. J Proteomics, 2013. 91: p. 405-16.	1/1/2013

1912			Kachuri L, Demers PA, Blair A, Spinelli JJ, Pahwa M, McLaughlin JR et al. (2013). Multiple pesticide exposures and the risk of multiple myeloma in Canadian men. Int J Cancer, 133(8):1846–58.	1/1/2013
1913			Kier, L.D. and D.J. Kirkland, Review of genotoxicity studies of glyphosate and glyphosate-based formulations. Crit Rev Toxicol, 2013. 43(4): p. 283-315.	1/1/2013
1914			Kim YH, Hong JR, Gil HW, Song HY, Hong SY, "Mixtures of glyphosate and surfactant TN20 accelerate cell death via mitochondrial damage-induced apoptosis and necrosis," 2013, Toxicol In Vitro 27(1), pg.191-197.	1/1/2013
1915			Kimmel, G.L., et al., Evaluation of developmental toxicity studies of glyphosate with attention to cardiovascular development. Crit Rev Toxicol, 2013. 43(2): p. 79-95.	1/1/2013
1916			Krüger, M., et al., Field Investigations of Glyphosate in Urine of Danish Dairy Cows. Journal of Environmental & Analytical Toxicology, 2013. 3: p. 110186.	1/1/2013
1917			Li, Q., Lambrechts, M. J., Zhang, Q., Liu, S., Ge, D., Yin, R., Xi, M., & You, Z. (2013). Glyphosate and AMPA inhibit cancer cell growth through inhibiting intracellular glycine synthesis. Drug Design, Development and Therapy, 7, 635-643. doi:10.20047/DDDT.S49197.	1/1/2013

			https://www.ncbi.nlm.nih.gov/pubmed/23983455.	
1918			Mañas, F, Peralta, L., Ugnia, L, Weyers, A, García, Ovando H, & Gorla, N. (2013). Oxidative stress and comet assay in tissues of mice administered glyphosate and ampa in drinking water for 14 days. BAG. Journal of Basic and Applied Genetics, 24(2).	1/1/2013
1919			Mesnage, R., Bernay, B., & Seralini, G. E. (2013). Ethoxylated adjuvants of glyphosate-based herbicides are active principles of human cell toxicity. Toxicology, 313(2-3), 122-128. doi:10.1016/j.tox.2012.09.16. https://www.ncbi.nlm.nih.gov/pubmed/2310283.	1/1/2013
1920			Mesnage, R., et al., Cytotoxicity on human cells of Cry1Ab and Cry1Ac Bt insecticidal toxins alone or with a glyphosate-based herbicide. J Appl Toxicol, 2013. 33(7): p. 695-9.	1/1/2013
1921			Meza-Joya, F.L., M.P. Ramirez-Pinilla, and J.L. Fuentes-Lorenzo, Toxic, cytotoxic, and genotoxic effects of a glyphosate formulation (Roundup(R)SLCosmoflux(R)411F) in the direct-developing frog Eleutherodactylus johnstonei. Environ Mol Mutagen, 2013. 54(5): p. 362-73.	1/1/2013
1922			MLHB (2013). Determination of glyphosate residues in human urine samples from 18 European countries. Bremen: Medical Laboratory of	1/1/2013

			Bremen. Available from: https://www.foeeurope.org/sites/default/files/glyphosate_studyresults_june12.pdf.	
1923			Mostafalou & Abdollahi, Pesticides and Human Chronic Diseases: Evidences, Mechanisms, and Perspectives 268 Toxicol. Appl. Pharmacol. 157 (2013)	1/1/2013
1924			Nobels, I. et al., "Toxicity ranking and toxic mode of action evaluation of commonly used agricultural adjuvants on the basis of bacterial gene expression profiles," 2013, PLoS ONE 6, pg. 264.	1/1/2013
1925			Nwani, C.D., et al., DNA damage and oxidative stress modulatory effects of glyphosate-based herbicide in freshwater fish, Channa punctatus. Environ Toxicol Pharmacol, 2013. 36(2): p. 539-47.	1/1/2013
1926			Parron, et al, Environmental Exposure to Pesticides and Cancer Risk in Multiple Human Organ Systems 230 Toxicol. Letters 157-165 (2013)	1/1/2013
1927			Perse, M., Oxidative stress in the pathogenesis of colorectal cancer: cause or consequence? Biomed Res Int, 2013. 2013: p. 725710.	1/1/2013
1928			Piola, L., et al., Comparative toxicity of two glyphosate-based formulations to Eisenia andrei under laboratory conditions. Chemosphere, 2013. 91(4): p. 545-51.	1/1/2013

1929			Pleasants, J.M. and K.S. Oberhauser, Milkweed loss in agricultural fields because of herbicide use: effect on the monarch butterfly population. Insect Conservation and Diversity, 2013. 6(2): p. 135-144.	1/1/2013
1930			Robert, et al., EPA, "Recognition And Management Of Pesticide Poisonings", Sixth Edition, 2013	1/1/2013
1931			Roberts, J.R. and R. Reigart, Chronic Effects, in Recognition and Management of Pesticide Poisonings. 2013, Environmental Protection Agency. p. 2002-238.	1/1/2013
1932			Samsel, A. and Seneff, S., "Glyphosate's suppression of cytochrome P450 enzymes and amino acid biosynthesis by the gut microbiome: Pathways to modern diseases," 2013, Entropy (15), pg. 1416-1463.	1/1/2013
1933			Séralini, G.-E., et al., Answers to critics: Why there is a long term toxicity due to a Roundup-tolerant genetically modified maize and to a Roundup herbicide. Food and chemical toxicology : an international journal published for the British Industrial Biological Research Association, 2013. 53: p. 476-83.	1/1/2013
1934			Service, R.F., Agriculture. What happens when weed killers stop killing? Science, 2013. 341(6152): p. 1329.	1/1/2013

1935			Sigurdardottir, et al, Sleep Disruption Among Older Men and Risk of Prostate Cancer 22 Canc. Epidemiol. Biomarkers Prev. 872-879 (2013)	1/1/2013
1936			Taira, K., K. Fujioka, and Y. Aoyama, Qualitative profiling and quantification of neonicotinoid metabolites in human urine by liquid chromatography coupled with mass spectrometry. PLoS ONE, 2013. 8: p. 1-12.	1/1/2013
1937			Testbiotech, High levels of residues from spraying with glyphosate found in soybeans in Argentina, Editor^Editors. 2013, Institute for Independent Impact Assessment in Biotechnology,.	1/1/2013
1938			Thongprakaisang, S., Thiantanawat, A., Rangkadilok, N., Suriyo, T., and Satayavivad, J., Glyphosate Induces Human Breast Cancer Cells Growth Via Estrogen Receptors. Food Chem Toxieol, 2013. 59(1): p. 129-136.	1/1/2013
1939			Vera-Candioti, J., S. Soloneski, and M.L. Larramendy, Evaluation of the genotoxic and cytotoxic effects of glyphosate-based herbicides in the ten spotted livebearer fish Cnesterodon decemmaculatus (Jenyns, 1842). Ecotoxicol Environ Saf, 2013. 89: p. 166-73.	1/1/2013
1940			Vera-Candioti, J., S. Soloneski, and M.L. Larramendy, Single-cell gel electrophoresis assay in the ten spotted live-bearer fish, Cnesterodon decemmaculatus (Jenyns,	1/1/2013

			1842), as bioassay for agrochemical-induced genotoxicity. Ecotoxicol Environ Saf, 2013. 98: p. 368-73.	
1941			Wagner, N., et al., Questions concerning the potential impact of glyphosate-based herbicides on amphibians. Environmental Toxicology and Chemistry, 2013. 32: p. 1688-171.	1/1/2013
1942			Yadav, S.S., et al., Toxic and genotoxic effects of Roundup on tadpoles of the Indian skittering frog (Euflictis cyanophlyctis) in the presence and absence of predator stress. Aquat Toxicol, 2013. 132-133: p. 1-8.	1/1/2013
1943			Zhao, W., Yu, H., Zhang, J., E1934& Shu, L. (2013). [Effects of glyphosate on apoptosis and expressions of androgen-binding protein and vimentin mRNA in mouse Sertoli cells]. Nan Fang Yi Ke Da Xue Xue Bao, 33(11), 1709-1713.	1/1/2013
1944			Zouaoui, K., et al., Determination of glyphosate and AMPA in blood and urine from humans: about 13 cases of acute intoxication. Forensic Sci Int, 2013. 226(1-3): p. e20-5.	1/1/2013
1945			Review of Genotoxicity Studies of Glyphosate and Glyphosate-Based Formulations	3/12/2013
1946			Wang, W., et al., A novel 5-enolpyruvoylshikimate-3-phosphate (EPSP) synthase transgene for glyphosate resistance stimulates growth and fecundity in weedy rice	8/1/2013

			(Oryza sativa) without herbicide. (1469-8137 (Electronic)).	
1947			Alavanja MC, Hofmann JN, Lynch CF, Hines CJ, Barry KH, Barker J, Buckman DW, Thomas K, Sandler DP, Hoppin JA, Koutros S, Andreotti G, Lubin JH, Blair A, Beane Freeman LE. Non-hodgkin lymphoma risk and insecticide, fungicide and fumigant use in the agricultural health study. PLoS One. 2014 Oct 22;9(10):e109332. doi: 10.1371/journal.pone.0109332. eCollection 2014.	1/1/2014
1948			Alvarez-Moya, C., et al., Comparison of the in vivo and in vitro genotoxicity of glyphosate isopropylamine salt in three different organisms. Genet.Mol Biol, 2014. 37(1): p. 105-110.	1/1/2014
1949			Armiliato, N., et al., Changes in ultrastructure and expression of steroidogenic factor-1 in ovaries of zebrafish Danio rerio exposed to glyphosate. J Toxicol Environ Health A, 2014. 77(7): p. 405-14.	1/1/2014
1950			Baer, K.N. and B.J. Marcel, Glyphosate. 2014: p. 767-769.	1/1/2014
1951			Battaglin W, Meyer M, Kuivila K, Dietze J. Glyphosate and its degradation product AMPA occur frequently and widely in US soils, surface water, groundwater, and precipitation. JAWRA Journal of the American Water Resources Association. 2014;50(2):275-290.	1/1/2014

1952			Bellé, C., et al., Yield and quality of wheat seeds as a function of desiccation stages and herbicides. Journal of Seed Science, 2014. 36: p. 063-070.	1/1/2014
1953			Bohn, T., et al., Compositional differences in soybeans on the market: glyphosate accumulates in Roundup Ready GM soybeans. Food Chem, 2014. 153: p. 207-15.	1/1/2014
1954			Briseis Aschebrook-Kilfoy, Medical History, Lifestyle, Family History, and Occupational Risk Factors for Mycosis Fungoides and Sézary Syndrome: The InterLymph Non-Hodgkin Lymphoma Subtypes Project, Journal of the National Cancer Institute Monographs, No. 48, 2014	1/1/2014
1955			Brodeur, J.C., et al., Synergy between glyphosate- and cypermethrin-based pesticides during acute exposures in tadpoles of the common South American Toad Rhinella arenarum. Chemosphere, 2014. 112: p. 70-76.	1/1/2014
1956			Brookes, G., Weed control changes and genetically modified herbicide tolerant crops in the USA 1996-2012. GM Crops Food, 2014. 5(4): p. 321-32.	1/1/2014
1957			Bruns, H.A., Stacked-Gene Hybrids Were Not Found to Be Superior to Glyphosate-Resistant or Non-GMO Corn Hybrids. Crop Management, 2014. 13(1): p. 0.	1/1/2014
1958			C.D. Klaassen (ed.). McGraw-Hill: New York. (Chapter 4).	1/1/2014

1959			Cattani, D., et al., Mechanisms underlying the neurotoxicity induced by glyphosate-based herbicide in immature rat hippocampus: involvement of glutamate excitotoxicity. Toxicology, 2014. 320: p. 34-45.	1/1/2014
1960			Chaufan, G., I. Coalova, and C. Rios de Molina Mdel, Glyphosate commercial formulation causes cytotoxicity, oxidative effects, and apoptosis on human cells: differences with its active ingredient. Int J Toxicol, 2014. 33(1): p. 29-38.	1/1/2014
1961			Chen, I.-W., Reference Information Prepared for " Rounding up Glyphosate - is it Really Safe " organized by APPG Agroecology , Houses of Parliament , London. 2014.	1/1/2014
1962			Chlopecka, M., et al., Glyphosate affects the spontaneous motoric activity of intestine at very low doses - in vitro study. Pestic Biochem Physiol, 2014. 113: p. 25-30.	1/1/2014
1963			Coalova, I., C. Rios de Molina Mdel, and G. Chaufan, Influence of the spray adjuvant on the toxicity effects of a glyphosate formulation. Toxicol In Vitro, 2014. 28(7): p. 1306-11.	1/1/2014
1964			Complaint in Sanchez v. Monsanto.	1/1/2014
1965			Cuhra, M., T. Traavik, and T. Bøhn, Life cycle fitness differences in Daphnia magna fed Roundup-Ready soybean or conventional soybean or	1/1/2014

			organic soybean. Aquaculture Nutrition, 2014. 2.	
1966			de Vivar Chevez, A.R., J. Finke, and R. Bukowski, The role of inflammation in kidney cancer. Adv Exp Med Biol, 2014. 816: p. 197-234.	1/1/2014
1967			dos Santos, K.C. and C.B. Martinez, Genotoxic and biochemical effects of atrazine and Roundup((R)), alone and in combination, on the Asian clam Corbicula fluminea. Ecotoxicol Environ Saf, 2014. 11: p. 7-14.	1/1/2014
1968			Edwards, C.B., et al., Benchmark study on glyphosate-resistant crop systems in the United States. Economics of herbicide resistance management practices in a 5 year field-scale study. Pest Manag Sci, 2014. 70(12): p. 1924-9.	1/1/2014
1969			Environmental Health Criteria 242 DERMAL EXPOSURE IOMC INTER-ORGANIZATION PROGRAMME FOR THE SOUND MANAGEMENT OF CHEMICALS	1/1/2014
1970			Farrer P, & Falck M., "Toxic glyphosate herbicides fly under the EU's regulatory radar," 2014, Pesticides News 96, pg. 1-4.	1/1/2014
1971			Fernandez-cornejo, J., et al., Genetically Engineered Crops in the United States. 2014.	1/1/2014
1972			Frasch, H.F. et al., "Analysis offinite dose dermal absorption data: Implications for dermal exposure assessment," 2014, J Expo Sci	1/1/2014

			Environ Epidemiol, 24(1), pg. 65-73.	
1973			Gelman, A. & E. Loken, The Statistical Crisis in Science, 102 American Scientist 460 (2014).	1/1/2014
1974			Green, J.M., Current state of herbicides in herbicide-resistant crops. Pest Manag Sci, 2014. 70(9): p. 1351-7.	1/1/2014
1975			Guilherme, S., et al., Are DNA-damaging effects induced by herbicide formulations (Roundup(R) and Garlon(R)) in fish transient and reversible upon cessation of exposure? Aquat Toxicol, 2014. 155: p. 2003-21.	1/1/2014
1976			Guilherme, S., Santos, M. A., Gaivão, I., & Pacheco, M. (2014). DNA and chromosomal damage induced in fish (Anguilla anguilla L.) by aminomethylphosphonic acid (AMPA)—the major environmental breakdown product of glyphosate. Environmental Science and Pollution Research, 21(14), 8730-8739. doi:10.117/s11356-014-2803-1.	1/1/2014
1977			Heap, I., Global perspective of herbicide-resistant weeds. Pest Manag Sci, 2014. 70(9): p. 1306-15.	1/1/2014
1978			Herbert, L.H., et al., Effects of field-realistic doses of glyphosate on honeybee appetitive behaviour. The Journal of experimental biology, 2014.	1/1/2014
1979			Jaehwan, 5., "Comparison of international guidelines of dermal absorption tests used	1/1/2014

			in Pesticides Exposure Assessment for Operators," 2014, Toxicol Res 4, pg. 251-260.	
1980			Jayasumana, C., S. Gunatilake, and P. Senanayake, Glyphosate, hard water and nephrotoxic metals: are they the culprits behind the epidemic of chronic kidney disease of unknown etiology in Sri Lanka? Int J Environ Res Public Health, 2014. 11(2): p. 20025-47.	1/1/2014
1981			Jung, E, and Maibach, H., "Animal models for percutaneous absorption," 2014, in Shah, V., Maibach, H., and Jenner, J. eds. Topical Drug Bioavailability, Bioequivalence, and Penetration, 2nd ed. New York: Springer, pg. 21-40.	1/1/2014
1982			Kumar, Sudhir, Khodoun, Marat, Kettleson, Eric M., McKnight, Christopher, Reponen, Tiina, Grinshpun, Sergey A., & Adhikari, Atin. (2014). Glyphosate-rich air samples induce IL-33, TSLP and generate IL-13 dependent airway inflammation. Toxicology, 325, 42-51. doi:10.1016/j.tox.2014.08.18.	1/1/2014
1983			Kwiatkowska, M., B. Huras, and B. Bukowska, The effect of metabolites and impurities of glyphosate on human erythrocytes (in vitro). Pestic Biochem Physiol, 2014. 109: p. 34-43.	1/1/2014
1984			Lamb, et al., Critical comments on the WHOUNEP State of the Science of Endocrine	1/1/2014

			Disrupting Chemicals 69 Regulatory Toxicology and Pharmacology 22-40 (2014)	
1985			Larsen, K., et al., Effects of Sub-lethal Exposure to a Glyphosate-Based Herbicide Formulation on Metabolic Activities of Different Xenobiotic-Metabolizing Enzymes in Rats. Int. J. Toxicol., 2014. 33(4): p. 307-318.	1/1/2014
1986			Londo, J.P., et al., Sub-lethal glyphosate exposure alters flowering phenology and causes transient male-sterility in Brassica spp. BMC plant biology, 2014. 14: p. 70.	1/1/2014
1987			Lopes, F.M., et al., Effect of glyphosate on the sperm quality of zebrafish Danio rerio. Aquat Toxicol, 2014. 155: p. 322-6.	1/1/2014
1988			Marques, A., et al., Progression of DNA damage induced by a glyphosate-based herbicide in fish (Anguilla anguilla) upon exposure and post-exposure periods--insights into the mechanisms of genotoxicity and DNA repair. Comp Biochem Physiol C Toxicol Pharmacol, 2014. 166: p. 126-33.	1/1/2014
1989			Mesnage, R., et al., Major pesticides are more toxic to human cells than their declared active principles. Biomed Res Int, 2014. 2014: p. 179691.	1/1/2014
1990			Moreno, N.C., S.H. Sofia, and C.B. Martinez, Genotoxic effects of the herbicide Roundup Transorb and its	1/1/2014

			active ingredient glyphosate on the fish Prochilodus lineatus. Environ Toxicol Pharmacol, 2014. 37(1): p. 448-54.	
1991			Muangphra, P., W. Kwankua, and R. Gooneratne, Genotoxic effects of glyphosate or paraquat on earthworm coelomocytes. Environ Toxicol, 2014. 29(6): p. 612-20.	1/1/2014
1992			Mucci, et al, Maternal Smoking and Childhood Leukemia and Lymphoma Risk 13 Cancer Epidemiol. Biomarkers Prev. 1528- 1533 (2004)	1/1/2014
1993			Murray, H.E. and K.A. Thayer, Implementing systematic review in toxicological profiles: ATSDR and NIEHS/NTP collaboration. J Environ Health, 2014. 76(8): p. 34-5.	1/1/2014
1994			Navarro, C.D. and C.B. Martinez, Effects of the surfactant polyoxyethylene amine (POEA) on genotoxic, biochemical and physiological parameters of the freshwater teleost Prochilodus lineatus. Comp Biochem Physiol C Toxicol Pharmacol, 2014. 165: p. 83-90.	1/1/2014
1995			Nevison, C.D., A comparison of temporal trends in United States autism prevalence to trends in suspected environmental factors. Environmental Health, 2014. 13: p. 73.	1/1/2014
1996			NRC Committee to Review the Styrene Assessment in the National Toxicology	1/1/2014

			Program 12th Report on Carcinogens, in Review of the Styrene Assessment in the National Toxicology Program 12th Report on Carcinogens: Workshop Summary. 2014, National Academies Press: Washington (DC).	
1997			Nwani, C.D., et al., Induction of micronuclei and nuclear lesions in Channa punctatus following exposure to carbosulfan, glyphosate and atrazine. Drug Chem Toxicol, 2014. 37(4): p. 370-7.	1/1/2014
1998			Pahwa, et al., The North American Pooled Project (NAPP): Pooled analyses of Case- Control Studies of Pesticides and Agricultural Exposures, Lymphohematopoietic Cancers and Sarcoma 71 Occup Environ Med A1- A132 (2014) (Poster Presentation)	1/1/2014
1999			Pahwa, et al., The North American Pooled Project (NAPP): Pooled analysis of case-control studies of pesticides and agricultural expostures, lympohematopoietic cancers and sarcoma. Occup. Environ. Med., 2014. 41: A116	1/1/2014
2000			Philipp Schledorn, M.K., Detection of Glyphosate Residues in Animals and Humans. Journal of Environmental & Analytical Toxicology, 2014. 04(02).	1/1/2014
2001			Raines, N., et al., Risk factors for reduced glomerular filtration rate in a Nicaraguan community affected by	1/1/2014

			Mesoamerican nephropathy. MEDICC Rev, 2014. 16(2): p. 16-22.	
2002			Rothman, K.J., Six Persistent Research Conceptions, 29 J. Gen. Intern. Med 7, 1060- 64, 1063 (2014)	1/1/2014
2003			Roustan, A., et al., Genotoxicity of mixtures of glyphosate and atrazine and their environmental transformation products before and after photoactivation. Chemosphere, 2014. 108: p. 93-11.	1/1/2014
2004			Sammons, R.D. and T.A. Gaines, Glyphosate resistance: state of knowledge. Pest Management Science, 2014. 70(9): p. 1367-1377.	1/1/2014
2005			Santadino, M., C. Coviella, and F. Momo, Glyphosate Sublethal Effects on the Population Dynamics of the Earthworm Eisenia fetida (Savigny, 1826). Water, Air, & Soil Pollution, 2014. 225(12).	1/1/2014
2006			Schinasi L, Leon ME. Non-Hodgkin lymphoma and occupational exposure to agricultural pesticide chemical groups and active ingredients: a systematic review and meta-analysis. Int J Environ Res Public Health. 2014;11(4):4449-4527.	1/1/2014
2007			Séralini, G.-E., et al., Conflicts of interests, confidentiality and censorship in health risk assessment: the example of an herbicide and a GMO. Environmental Sciences Europe, 2014. 26: p. 13.	1/1/2014

2008			Seralini, G.E., et al., Republished study: long-term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize. Environmental Sciences Europe, 2014. 26(1): p. 14.	1/1/2014
2009			Shaner, D.L. and H.J. Beckie, The future for weed control and technology. Pest Manag Sci, 2014. 70(9): p. 1329-39.	1/1/2014
2010			Shehata, A., et al., Distribution of Glyphosate in Chicken Organs and its Reduction by Humic Acid Supplementation. The Journal of Poultry Science, 2014. 51: p. 333-337.	1/1/2014
2011			Sinhorin, V.D., et al., Effects of the acute exposition to glyphosate-based herbicide on oxidative stress parameters and antioxidant responses in a hybrid Amazon fish surubim (Pseudoplatystoma sp). Ecotoxicol Environ Saf, 2014. 106: p. 181-7.	1/1/2014
2012			Swanson, N.L., et al., Genetically engineered crops , glyphosate and the deterioration of health in the United States of America. 2014. 9: p. 6-37.	1/1/2014
2013			Thompson, H.M., et al., Evaluating exposure and potential effects on honeybee brood (Apis mellifera) development using glyphosate as an example. Integr Environ Assess Manag, 2014. 10(3): p. 463-70.	1/1/2014
2014			Uren Webster, T.M., et al., Effects of glyphosate and its formulation, roundup, on	1/1/2014

			reproduction in zebrafish (Danio rerio). Environ Sci Technol, 2014. 48(2): p. 1271-9.	
2015			USEPA, Guidelines for Carcinogen Risk Assessment (1986)	1/1/1986
2016			Rooney, A.A., et al., Systematic review and evidence integration for literaturebased environmental health science assessments. Environ Health Perspect, 2014. 122(7): p. 711-8	1/1/2014
2017			Wilson, et al, Vasectomy and Risk of Aggressive Prostate Cancer: A 24-Year Follow-Up Study 32 J. Clin. Onco. 3033-3038 (2014)	1/1/2014
2018			Annett R, Habibi HR, Hontela 4., "Impact of glyphosate and glyphosate-based herbicides on the freshwater environment," 201.4,J Appl Toxicol 34(5), pg.458-479.	2/25/2014
2019			New Paper	6/16/2014
2020			Morton, et. aL, "Etiologic heterogeneity among non-Hodgkin lymphoma subtypes: the Inter-Lymph NonHodgkin Lymphoma Subtypes Project," August 2014, J Natl Cancer Inst Monogr. (48), pg. 130-44.	8/1/2014
2021			World Trade Center Health Program, Minimum Latency & Types or Categories of Cancer	11/7/2014
2022			Greim Data Supplements; Studies 1-14, dated 12-19-2014	12/19/2014
2023			Abarikwu, S.O., et al., Combined effects of repeated administration of Bretmont Wipeout (glyphosate) and Ultrazin (atrazine) on	1/1/2015

			testosterone, oxidative stress and sperm quality of Wistar rats. Toxicol Mech Methods, 2015. 25(1): p. 70-80.	
2024			Abukari, Pesticides Applicator Exposure Assessment: A Comparison between Modeling and Actual Measurement, Journal of Environment and Earth Science, Vol.5, No.11, 2015	1/1/2015
2025			Baurand, P.E., N. Capelli, and A. de Vaufleury, Genotoxicity assessment of pesticides on terrestrial snail embryos by analysis of random amplified polymorphic DNA profiles. J Hazard Mater, 2015. 298: p. 320-7.	1/1/2015
2026			Begley, D.A., et al., Finding mouse models of human lymphomas and leukemia's using the Jackson laboratory mouse tumor biology database. Exp Mol Pathol, 2015. 99(3): p. 533-6.	1/1/2015
2027			Benbrook C. Trends in the use of glyphosate herbicide in the U.S. and globally. Environmental Sciences Europe. 2015;28(3). http://dx.doi.org/10. 1186/s12302-016-170-0. Accessed 03 February 2016	1/1/2015
2028			BfR)., G.F.I.f.R.A., Glyphosate Renewal Assessment Report: Assessment of IARC Monographies Volume 112 (2015). 2015. V. 3Glyphosate Addendum I to RAR. p.	1/1/2015
2029			Bleeke, M., Glyphosate Exposure Assessment for Prop 65, Editor^Editors. 2015.	1/1/2015

2030			Bunge, J. Monsanto Shareholder Meeting Gets Heated. Wall Street Journal, 2015; Available from: https://blogs.wsj.com/corporate-intelligence/2015/01/30/monsanto-shareholder-meeting-gets-heated/.	1/1/2015
2031			Cao, L., et al., 2015, Assessment of potential dermal and inhalation exposure of workers to the insecticide imidacloprid using whole-body dosimetry in China, Journal of Environmental Sciences 27(2015)139–146.	1/1/2015
2032			Chen, et al, Residential Exposure to Pesticide During Childhood and Childhood Cancers: A Meta-Analysis 136 Pediatrics 719-729 (2015)	1/1/2015
2033			Cockburn, A. Weed Whackers: Monsanto, glyphosate, and the war on invasive species. Harper's Magazine, 2015; Available from: https://harpers.org/archive/2015/09/weed-whackers/.	1/1/2015
2034			Complaint in Fitzgerald v. Monsanto	1/1/2015
2035			Complaint in Giglio v. Monsanto	1/1/2015
2036			Complaint in Rubio v. Monsanto	1/1/2015
2037			Complaint in Sheppard v. Monsanto	1/1/2015
2038			Coupe RH, Capel PD. Trends in pesticide use on soybean, corn and cotton since the introduction of major genetically modified crops in	1/1/2015

			the United States. Pest management science.	
2039			Cutaneous Lymphoma International Consortium Study of Outcome in Advanced Stages of Mycosis Fungoides and Sézary Syndrome: Effect of Specific Prognostic Markers on Survival and Development of a Prognostic Model (2015)	1/1/2015
2040			Duke, S.O., Perspectives on transgenic, herbicide-resistant crops in the United States almost 20 years after introduction. Pest Manag Sci, 2015. 71(5): p. 652-7.	1/1/2015
2041			Erickson, B. and M. Bomgardner Rocky Road For Roundup. Chemical & Engineering News, 2015.	1/1/2015
2042			European Chemicals Agency, Guidance on the Application of the CLP Criteria: Guidance to Regulation (EC) No 1272/2008 on classification, labelling and packaging (CLP) of substances and mixtures. 2015, European Chemicals Agency: Helsinki, Finland.	1/1/2015
2043			Fagan, J., T. Traavik, and T. Bøhn, The Seralini affair: degeneration of Science to Re-Science? Environmental Sciences Europe, 2015. 27(1).	1/1/2015
2044			Gaupp-Berghausen, M., et al., Glyphosate-based herbicides reduce the activity and reproduction of earthworms and lead to increased soil nutrient concentrations. Sci Rep, 2015. 5: p. 12886.	1/1/2015
2045			Gillam, C. Scientist defends WHO group report linking	1/1/2015

			herbicide to cancer. Reuters, 2015; Available from: https://in.reuters.com/article/us-monsanto-herbicide/scientist-defends-who-group-report-linking-herbicide-to-cancer-idINKBN0MM2JR20150326.	
2046			Greim, H., et al., Evaluation of carcinogenic potential of the herbicide glyphosate, drawing on tumor incidence data from fourteen chronic/carcinogenicity rodent studies. Crit Rev Toxicol, 2015. 45(3): p. 185-208.	1/1/2015
2047			Grieve AP. How to test hypotheses if you must. Pharmaceutical statistics. 2015;14(2):139-150.	1/1/2015
2048			Guyton, K.Z., et al., Carcinogenicity of tetrachlorvinphos, parathion, malathion, diazinon, and glyphosate. Lancet Oncol, 2015. 16(5): p. 490-1.	1/1/2015
2049			Jain, Initial treatment of CLL: integrating biology and functional status Blood 2015 126:463-470;	1/1/2015
2050			Jasyasumana et al Simultaneous exposure to multiple heavy metals and glyphosate may contribute to Sri Lankan agricultural nephropathy, BMC Nephrology (2015) 16:103	1/1/2015
2051			Jayasumana, C., et al., Drinking well water and occupational exposure to Herbicides is associated with chronic kidney disease, in Padavi-Sripura, Sri Lanka. Environ Health, 2015. 14: p. 6.	1/1/2015

2052			Jayasumana, C., S. Gunatilake, and S. Siribaddana, Simultaneous exposure to multiple heavy metals and glyphosate may contribute to Sri Lankan agricultural nephropathy. BMC Nephrol, 2015. 16: p. 103.	1/1/2015
2053			Kaskey, J. Monsanto Rises After Predicting Growth in Soybean Sales Bloomberg, 2015.	1/1/2015
2054			Kier, L.D., Review of genotoxicity biomonitoring studies of glyphosate-based formulations. Crit Rev Toxicol, 2015. 45(3): p. 209-18.	1/1/2015
2055			Livingston, M., et al., The Economics of Glyphosate Resistance Management in Corn and Soybean Production. 2015.	1/1/2015
2056			Ma, J., Y. Bu, and X. Li, Immunological and histopathological responses of the kidney of common carp (Cyprinus carpio L.) sublethally exposed to glyphosate. Environ Toxicol Pharmacol, 2015. 39(1): p. 1-8.	1/1/2015
2057			Marques, A., et al., Erratum To: Progression of DNA damage induced by a glyphosate-based herbicide in fish (Anguilla anguilla) upon exposure and postexposure periods--insights into the mechanisms of genotoxicity and DNA repair. Comp Biochem Physiol C Toxicol Pharmacol, 2015. 168: p. 1.	1/1/2015
2058			Mesnage, R., Defarge, N., Spiroux de Vendomois, J., and	1/1/2015

			Seralini, G.E., Potential Toxic Effects of Glyphosate and Its Commercial Formulations Below Regulatory Limits. Food Chem Toxieol, 2015. 84: p. 133-153.	
2059			Mesnage, R., et al., Transcriptome profile analysis reflects rat liver and kidney damage following chronic ultra-low dose Roundup exposure. Environ Health, 2015. 14: p. 70.	1/1/2015
2060			Minigalieva, I.A., et al., Attenuation of Combined Nickel(II) Oxide and Manganese(II, III) Oxide Nanoparticles' Adverse Effects with a Complex of Bioprotectors. Int J Mol Sci, 2015. 16(9): p. 22555-83.	1/1/2015
2061			National Toxicology Program. Handbook for Preparing Report on Carcinogens Monographs. 2015, Available from: https://ntp.niehs.nih.gov/ntp/roc/handbook/roc_handbook_508.pdf.	1/1/2015
2062			Niemann, et al A critical review of glyphosate findings in human urine samples and comparison with the exposure of operators and consumers;, J. Verbr. Lebensm. (2015) DOI 10.117/s113-014-0927-3	1/1/2015
2063			Owen, M.D., et al., Integrated pest management and weed management in the United States and Canada. 2015. 71(3): p. 357-376.	1/1/2015
2064			Owen, M.D.K., 2016 Herbicide Guide for Iowa Corn and Soybean Production,	1/1/2015

			Editor^Editors. 2015, Iowa State University,.	
2065			Pahwa - An Evaluation of Glyphosate Use and The Risks of NHL Major Histological Sub-Types in The North American Pooled Project	1/1/2015
2066			Pahwa et al., An Evaluation Of Glyphosate Use And The Risks Of Non-Hodgkin Lymphoma Major Histological Sub-Types In The North American Pooled Project (Napp), Environmental Health Perspectives ISEE Conference Abstract (2015)	1/1/2015
2067			Pahwa M, Freeman LB, Demers PA, et al. An evaluation of glyphosate use and the risks of NHL major histological subtypes in the North American Pooled Project. International Society for Environmental Epidemiology; August 31, 2015; Sao Paulo, Brazil.	1/1/2015
2068			Pearce et al. IARC Monographs: 40 Years of Evaluating Carcinogenic Hazards to Humans. Environ Health Perspect, 2015. 123(6): p. 507-514.	1/1/2015
2069			Portier, C., IARC Monograph Review Process and Glyphosate: Cancer by Glyphosate - how dangerous is the herbicide? Deutscher Bundestag, Berlin, June 6, 2015	1/1/2015
2070			Rapporteur Member State (Germany). Assessment of the IARC Monographics Volume 112 (2015): Glyphosate. Glyphosate Addendum I to	1/1/2015

			Renewal Assessment Reprint, August 31, 2015.	
2071			Sol Balbuena, M., et al., Effects of sub-lethal doses of glyphosate on honeybee navigation. J Exp Biol, 2015.	1/1/2015
2072			Sorahan, T., Multiple myeloma and glyphosate use: a re-analysis of US Agricultural Health Study (AHS) data. Int J Environ Res Public Health, 2015. 12(2): p. 1548-59.	1/1/2015
2073			Tier II summaries for glyphosate carcinogenicity studies from Greim, et al., 2015 paper," Unpublished data.	1/1/2015
2074			Trafimow, D. & M. Marks, Editorial , 37 Basic and Applied Social Psychol. 1 (2015).	1/1/2015
2075			Uno, H., et al., A versatile test for equality of two survival functions based on weighted differences of Kaplan-Meier curves. Stat Med, 2015. 34(28): p. 3680-95.	1/1/2015
2076			Williams, G.M., et al., Expert Panel Reivew of the Carcinogenic Potential of the Herbicide Glyphosate, Poster Presentation, 2015.	1/1/2015
2077			Essaumang, D.K. Some implication of environmental pesticides pollution on malaria control in Ghana. Integrative Pharmacology, Toxicology and Genotoxicology, 2015. 1(1): p. 12-19. (Young, F., was the wrong author)	1/1/2015
2078			Christensen, et al. The Use of Epidemiology in Risk Assessment: Challenges and Opportunities, Human and	2/9/2015

			Ecological Risk Assessment: An International journal, 21:6, 1644-1663	
2079			RE: Glyphosate IARC	3/23/2015
2080			May 22, 2015 email from Michael Goodis to Jess Rowland (EPAHQ_15644).	5/22/2015
2081			Pearce - IARC Monographs: 40 Years	6/1/2015
2082			Pahwa et al., An E An Detailed Evaluation of Glyphosate Use and the Risk of Non-Hodgkin Lymphoma in the North American Pooled Project (NAPP), CSEB Conference, Mississauga, ON (June 3, 2015).	6/3/2015
2083			Pahwa, et al., A Detailed Evaluation of Glyphosate Use and the Risk of Non-Hodgkin Lymphoma in the NAPP CSEB Abstract (6/3/15)	6/3/2015
2084			Avila-vazquez, M., et al., Cancer and detrimental reproductive effects in an Argentine agricultural community environmentally exposed to glyphosate. 5915933.	9/1/2015
2085			9/21/15 draft of Pahwa, et al., An evaluation of glyphosate use and the risk of non-Hodgkin lymphoma major histological subtypes in the North American Pooled Project (NAPP)	9/21/2015
2086			Letter and Check from AAP to Grant re Offer of Financial Support or Exhibit at the National Confernce	9/24/2015
2087			Expert opinion on adherence to the rules of good scientific practice in the subsections "B.6.4.8 Published data	10/1/2015

			(released since 2000)","B.6.5.3 Published data on carcinogenicity (released since 2000)" and "B.6.6.12 Published data (released since 2000)" in the report "Final addendum to the Renewal Assessment Report. Risk assessment [...] for the active substance GLYPHOSATE [...]", (October 2015)	
2088			Comments in opposition to the Office of Environmental Health Hazard Assessment's (OEHHA) intention to list glyphosate under the Label Code Provision of the Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65	10/9/2015
2089			SEER Cancer Statistics Review, 1975-2013. Table 19.7: Non-Hodgkin Lymphoma, Incidence and mortality rates by age. 2016; http://seer.cancer.gov/csr/1975_2013/, based on November 2015 SEER data submission, posted to the SEER web site	11/1/2015
2090			Abd, et al., "Skin models for testing of transdermal drugs, 2016, Clin Pharmacol. 2016;8:163-176	1/1/2016
2091			Acquavella, J. Review: Comments of Chris J. Portier, PhD., USEPA (EPA-HQ_OPP-2016-0385-194); Glyphosate Issue Paper: Evaluation of Carcinogenic Potential. 20 Nov. 2016.	1/1/2016
2092			Acquavella, J., et al., Comments on Charge Questions for Consideration by EPA	1/1/2016

			FIFRA SAP: Review of Glyphosate, Presentation, 2016.	
2093			Acquavella, J., et al., Glyphosate epidemiology expert panel review: a weight of evidence systematic review of the relationship between glyphosate exposure and non-Hodgkin's lymphoma or multiple myeloma. Crit Rev Toxicol, 2016. 46(sup1): p. 28-43.	1/1/2016
2094			Aghadavod, E., et al., Role of Oxidative Stress and Inflammatory Factors in Diabetic Kidney Disease. Iran J Kidney Dis, 2016. 10(6): p. 337-343.	1/1/2016
2095			Alleva, R., et al., Organic honey supplementation reverses pesticide-induced genotoxicity by modulating DNA damage response. Mol Nutr Food Res, 2016. 60(10): p. 2243-2255.	1/1/2016
2096			Bai, S.H. and S.M. Ogbourne, Glyphosate: environmental contamination, toxicity and potential risks to human health via food contamination. Environ Sci Pollut Res Int, 2016. 23(19): p. 18988-911.	1/1/2016
2097			Bedano, J. and A. Domínguez, Large-Scale Agricultural Management and Soil Meso- and Macrofauna Conservation in the Argentine Pampas. Sustainability, 2016. 8(7).	1/1/2016
2098			Bohnenblust, E.W., et al., Effects of the herbicide dicamba on nontarget plants and pollinator visitation.	1/1/2016

			Environ Toxicol Chem, 2016. 35(1): p. 144-51.	
2099			Bolognesi, C. and Holland, N., The Use of the Lymphocyte Cytokinesis-Block Micronucleus Assay for Monitoring Pesticide-Exposed Populations. Mutat Res, 2016. 770{Pt A}: p. 183-203.	1/1/2016
2100			Bonifacio, A.F., et al., Alterations in the general condition, biochemical parameters and locomotor activity in Cnesterodon decemmaculatus exposed to commercial formulations of chlorpyrifos, glyphosate and their mixtures. Ecological Indicators, 2016. 67: p. 88-97.	1/1/2016
2101			Brodeur, J.C., et al., Toxicities of glyphosate- and cypermethrin-based pesticides are antagonic in the tenspotted livebearer fish (Cnesterodon decemmaculatus). Chemosphere, 2016. 155: p. 429-435.	1/1/2016
2102			Brouwer et al., Assessment of Occupational Exposure to Pesticides in a Pooled Analysis of Agricultural Cohorts within the AGRICOH Consortium 73 Occup. Environ. Med. 359 (2016)	1/1/2016
2103			Brusick, D., et al., Genotoxicity Expert Panel review: weight of evidence evaluation of the genotoxicity of glyphosate, glyphosate-based formulations, and aminomethylphosphonic acid. Crit. Rev. Toxicol., 2016. 46(sup1): p. 56-74.	1/1/2016

2104			Burstyn, I. and A.J. De Roos, Visualizing the Heterogeneity of Effects in the Analysis of Associations of Multiple Myeloma with Glyphosate Use. Comments on Sorahan, T. Multiple Myeloma and Glyphosate Use: A Re-Analysis of US Agricultural Health Study (AHS) Data. Int. J. Environ. Res. Public Health 2015, 12, 1548-1559. Int J Environ Res Public Health, 2016. 14(1).	1/1/2016
2105			Chamkasem, N. and T. Harmon, Direct determination of glyphosate, glufosinate, and AMPA in soybean and corn by liquid chromatography/tandem mass spectrometry. Anal Bioanal Chem, 2016. 408(18): p. 4995-514.	1/1/2016
2106			Chamkasem, N., Method development/validation of the direct determination of glyphosate, glufosinate, and AMPA in Food by LC/MS., Editor^Editors. 2016.	1/1/2016
2107			Chang ET, Delzell E. Systematic review and meta-analysis of glyphosate exposure and risk of lymphohematopoietic cancers. J Environ Sci Health B. 2016;51(6):402-434.	1/1/2016
2108			Davies, S. Glyphosate panel split on chemical's carcinogenicity. Agri-Pulse 2016.	1/1/2016
2109			De Araujo, J.S.A. et al., Glyphosate and adverse pregnancy outcomes, a systematic review of observational studies, BMC Public Health (2016) 16:472.	1/1/2016

2110			Defarge, N., et al., Co-Formulants in Glyphosate-Based Herbicides Disrupt Aromatase Activity in Human Cells below Toxic Levels. International Journal of Environmental Research and Public Health, 2016. 13: p. 264.	1/1/2016
2111			EC. 2016. Glyphosate. European Commission - Fact Sheet FAQs: Glyphosate. Brussels. June 29th'	1/1/2016
2112			Environmental Protection Agency, Glyphosate Issue Paper: Evaluation of Carcinogenic Potential. 2016: Washington, DC.	1/1/2016
2113			EPA, Glyphosate: Evaluation of Carcinogenic Potential - Charge to FIFRA SAP for October 18-21, 2016 Meeting, 2016.	1/1/2016
2114			Freese, B., Comments to EPA RE: Docket EPA-HQ-OPP-2016-0385. 2016.	1/1/2016
2115			German Federal Institute for Occupational Safety and Health, Proposal for Harmonized Classification and Labeling: Glyphosate, F.O.f. Chemicals, Editor. 2016: Dortmund, Germany.	1/1/2016
2116			Ghisi Nde, C., E.C. de Oliveira, and A.J. Prioli, Does exposure to glyphosate lead to an increase in the micronuclei frequency? A systematic and meta-analytic review. Chemosphere, 2016. 145: p. 42-54.	1/1/2016
2117			Greenland et al., Statistical tests, P values, confidence intervals, and power: a guide	1/1/2016

			to misinterpretations 31 Eur J. Epidemiol. 337- 350 (2016)	
2118			Grube A, Donaldson D, Kiely T, Wu L. Pesticide industry sales and usage: 2006 and 2007 market estimates. Washington, DC: US Environmental Protection Agency; 2011.	1/1/2016
2119			Hansen, L.R. and P. Roslev, Behavioral responses of juvenile Daphnia magna after exposure to glyphosate and glyphosate-copper complexes. Aquat Toxicol, 2016. 179: p. 36-43.	1/1/2016
2120			Haseman, J.K., Comments on the laboratory animal carcinogenicity studies evaluated in EPA's Glyphosate Issue Paper: Evaluation of Carcinogenic Potential, and an assessment of the comments by Dr. Christopher Portier on these studies. 2016, US EPA Docket Number (EPA-HQ-OPP-2016-0385-194): Washington DC.	1/1/2016
2121			Hecht, F., et al., The role of oxidative stress on breast cancer development and therapy. Tumour Biol, 2016. 37(4): p. 4281-91.	1/1/2016
2122			Infante, P.F., Glyphosate and Cancer: A Review of the Epidemiological Literature Related to the Development of Non-Hodgkin Lymphoma; Submitted as Public Comment to the Glyphosate SAP Panel". 2016.	1/1/2016
2123			Kamceva, G., et al., Cigarette Smoking and Oxidative Stress in Patients with	1/1/2016

			Coronary Artery Disease. Open Access Maced J Med Sci, 2016. 4(4): p. 636-640.	
2124			Li, L. and F. Chen, Oxidative stress, epigenetics, and cancer stem cells in arsenic carcinogenesis and prevention. Curr Pharmacol Rep, 2016. 2(2): p. 57-63.	1/1/2016
2125			Martini, C. et aL, "Glyphosate-based herbicides with different adjuvants are more potent inhibitors of 3T3-Ll fibroblast proliferation and differentiation to adipocytes than glyphosate alone," 2016, Comparative Clinical Pathology, Volume 25, Issue 3, pg. 607-613.	1/1/2016
2126			Mason, R., Grave Inaccuracies and Omissions in US EPA Glyphosate Issue Paper: Evaluation of Carcinogenic Potential, Editor^Editors. 2016.	1/1/2016
2127			McClellan, R.O., Evaluating the potential carcinogenic hazard of glyphosate. Crit Rev Toxicol, 2016. 46(sup1): p. 1-2.	1/1/2016
2128			Mesnage, R., et al., An integrated multi-omics analysis of the NK603 Roundup-tolerant GM maize reveals metabolism disturbances caused by the transformation process. Sci Rep, 2016. 6: p. 37855.	1/1/2016
2129			Mullin CA, Fine JD, Reynolds RD, Frazier MT, "Toxicological risks of agrochemical spray adjuvants: organosilicone surfactants may not be safe," 2016, Front Public Health, 4:92.	1/1/2016

2130			Myers JP, Antoniou MN, Blumberg B, et al. Concerns over use of glyphosate-based herbicides and risks associated with exposures: a consensus statement. Environ Health. 15:19.	1/1/2016
2131			Portier et al. Differences in the carcinogenic evaluation of glyphosate between the International Agency for Research on Cancer (IARC) and the European Food Safety Authority (EFSA). J Epidemiol Community Health. 2016;70(8):741-745.	1/1/2016
2132			Portier, C., Carcinogenicity of Glyphosate: A Systematic Review of the Available Evidence, Presentation to EChA, November 21, 2016.	1/1/2016
2133			Portier, C., Comments of C. Portier on USEPA (EPA-HQ-OPP-2016-0385-194) Glyphosate Issue Paper: Evaluation of Carcinogenic Potential. 2016.	1/1/2016
2134			Portier, C.J., Comments on Glyphosate Issue Paper (EPA-HQ-OPP-2016-0385-194). 2016, US EPA Docket Number (EPA-HQ-OPP-2016-0385-194): Washington DC.	1/1/2016
2135			Prasad, S., et al., Oxidative Stress and Cancer: Advances and Challenges. Oxid Med Cell Longev, 2016. 2016: p. 5010423.	1/1/2016
2136			Presutti, R., et al., Pesticide exposures and the risk of multiple myeloma in men: An analysis of the North American Pooled Project. Int J	1/1/2016

			Cancer, 2016. 139(8): p. 1703-14.	
2137			Quarles, W., Glyphosate Toxicity—Smoke or Fire? The IPM Practitioner, 2016. August 2016: p. 1-7.	1/1/2016
2138			Qureshi, M.A., Y.O. Kim, and D. Schuppan, Hepatocellular carcinoma in nonalcoholic fatty liver disease: A link between oxidative stress and T-cell suppression. Hepatology, 2016. 64(5): p. 1794-1797.	1/1/2016
2139			Rider, et al. Ejaculation and Risk of Prostate Cancer: Updated Results with An additional decade of follow up, Eur Urol. 2016 Dec;70(6):974-982	1/1/2016
2140			Saska, P., et al., Treatment by glyphosate-based herbicide alters life history parameters of the rose-grain aphid Metopolophium dirhodum. Sci Rep, 2016. 6: p. 27801.	1/1/2016
2141			Sayanthooran, S., et al., Upregulation of Oxidative Stress Related Genes in a Chronic Kidney Disease Attributed to Specific Geographical Locations of Sri Lanka. Biomed Res Int, 2016. 2016: p. 7546265.	1/1/2016
2142			Schaumburg, L.G., et al., Genotoxicity induced by Roundup(R) (Glyphosate) in tegu lizard (Salvator merianae) embryos. Pestic Biochem Physiol, 2016. 130: p. 71-78.	1/1/2016
2143			Smith, M.T., et al., Key Characteristics of Carcinogens as a Basis for Organizing	1/1/2016

			Data on Mechanisms of Carcinogenesis. Environ Health Perspect, 2016. 124(6): p. 713-21.	
2144			Solomon, K.R., Glyphosate in the General Population and in Applicators: A Critical Review of Studies on Exposures. Crit Rev Toxicol, 2016. 46(supl): p. 21-27.	1/1/2016
2145			Soloneski, S., C. Ruiz de Arcaute, and M.L. Larramendy, Genotoxic effect of a binary mixture of dicamba- and glyphosate-based commercial herbicide formulations on Rhinella arenarum (Hensel, 1867) (Anura, Bufonidae) late-stage larvae. Environ Sci Pollut Res Int, 2016. 23(17): p. 17811-21.	1/1/2016
2146			Tarone, R.E., On the International Agency for Research on Cancer Classification of Glyphosate as a Probable Human Carcinogen. Eur J Cancer Prev, 2016.	1/1/2016
2147			Toyokuni, S., Oxidative stress as an iceberg in carcinogenesis and cancer biology. Arch Biochem Biophys, 2016. 595: p. 46-9.	1/1/2016
2148			Turkmen, K., Inflammation, oxidative stress, apoptosis, and autophagy in diabetes mellitus and diabetic kidney disease: the Four Horsemen of the Apocalypse. Int Urol Nephrol, 2016.	1/1/2016
2149			Vakonaki, E., et al., Complex interplay of DNA damage, DNA repair genes, and oxidative stress in coronary	1/1/2016

			artery disease. Anatol J Cardiol, 2016. 16(12): p. 939.	
2150			Van Hoesen, S., Study: Monsanto's Glyphosate Most Heavily Used WeedKiller In History, Editor^Editors. 2016, Environmental Working Group,.	1/1/2016
2151			Van Smeden, J. and Bouwstra, IA., "Stratum corneum lipids: Their role for the skin barrier function in healthy subjects and atopic dermatitis patients," 2016, Curr Prob. Dermatol49, pg. 8-26.	1/1/2016
2152			Vandenberg, L.N., et al., A proposed framework for the systematic review and integrated assessment (SYRINA) of endocrine disrupting chemicals. Environ Health, 2016. 15(1): p. 74.	1/1/2016
2153			Vieira, C.E., et al., Multiple biomarker responses in Prochilodus lineatus subjected to short-term in situ exposure to streams from agricultural areas in Southern Brazil. Sci Total Environ, 2016. 542(Pt A): p. 44-56.	1/1/2016
2154			Wasserstein et al., Statement on p-values: Context, Process, and Purpose, 70 Amer. Statistician 129 (2016)	1/1/2016
2155			Williams - A Review of the Carcinogenic Potential of Glyphosate by Four Indepentdent Expert Panels and Comparison to the IARC Assessment	1/1/2016
2156			Williams et al. (2016) Glyphosate rodent carcinogenicity bioassay	1/1/2016

			expert panel review. Crit Rev Tox 46; 44-55	
2157			Williams, G.M., et al., A review of the carcinogenic potential of glyphosate by four independent expert panels and comparison to the IARC assessment. Crit Rev Toxicol, 2016. 46(sup1): p. 3-20.	1/1/2016
2158			Thelin GP, Stone WW. Estimation of annual agricultural pesticide use for counties of the conterminous United States, 1992–2009: U.S. Geological Survey Scientific Investigations Report 2013–519, 54 p. http://on.doi.gov/ 1TEeEJD. Accessed 03 February 2016.	2/3/2016
2159			Soosten, J, et al., Excretion pathways and ruminal disappearance of glyphosate and its degradation product aminomethylphosphonic acid in dairy cows;. Dairy Sco. 2015 99:5318-5324	4/20/2016
2160			Bolognesi, The Use of lymphocyte cytokinesis-block micronucleus assay for monitoring pesticide exposed populations, Mutation research 770 (2}t6l 183-203	5/26/2016
2161			Glyphosate epidemiology expert panel review: a weight of evidence systematic review of the relationship between glyphosate exposure and non-Hodgkin's lymphoma or multiple myeloma	7/15/2016
2162			Soloman - Glyphosate in the General Population and in Applicators: A Critical Review of Studies on Exposures	7/15/2016

2163			Williams - Glyphosate Rodent Carcinogenicity Bioassay Expert Panel Review	7/15/2016
2164			Jain, S., Mucin 1 is a Potential Therapeutic Target in Cutaneous T-cell Lymphoma , Blood Vol. 126, No. 3 (16 July 2015).	7/16/2016
2165			August 22, 2016 Email Exchanges (Blair Exh. 35)	8/22/2016
2166			Catalog of produced metadata:Update on Glyphosate Epidemiology Activities GGTP Meeting PowerPoint	9/1/2016
2167			Glyphosate Issue Paper: Evaluation of Carcinogenic Potential	9/12/2016
2168			Acquavella - Glyphosate Epidemiology Expert Panel Review: a weight of evidence systematic review of the relationship between glyphosate exposure and NHL or Multiple Myeloma	9/28/2016
2169			Ahn, R. et al., Financial ties of principal investigators and randomized controlled trial outcomes: cross sectional study , 356 BMJ doi: 10.1136/bmj.i6770 (2017).	1/1/2017
2170			Aristilde, L., et al., Glyphosate-Induced Specific and Widespread Perturbations in the Metabolome of Soil Pseudomonas Species. Frontiers in Environmental Science, 2017. 5: p. 1-13.	1/1/2017
2171			Burella, P.M., M.F. Simoniello, and G.L. Poletta, Evaluation of Stage-Dependent Genotoxic Effect of Roundup((R)) (Glyphosate) on Caiman latirostris Embryos. Arch	1/1/2017

			Environ Contam Toxicol, 2017. 72(1): p. 50-57.	
2172			Canadian Food Inspection Agency, Safeguarding with Science: Glyphosate Testing in 2015-2016. 2017.	1/1/2017
2173			Chamkasem, N., Determination of Glyphosate, Maleic Hydrazide, Fosetyl Aluminum, and Ethephon in Grapes by Liquid Chromatography/Tandem Mass Spectrometry. J Agric Food Chem, 2017. 65(34): p. 7535-7541.	1/1/2017
2174			de Brito Rodrigues, L., et al., Ecotoxicological assessment of glyphosate-based herbicides: Effects on different organisms. Environ Toxicol Chem, 2017. 36(7): p. 1755-1763.	1/1/2017
2175			de Souza, J.S., et al., Perinatal exposure to glyphosate-based herbicide alters the thyrotrophic axis and causes thyroid hormone homeostasis imbalance in male rats. Toxicology, 2017. 377: p. 25-37.	1/1/2017
2176			Feldman, et al., Evaluation of Occupational Glyphosate Exposures among Employees Applying Herbicides at a National Park, 2017	1/1/2017
2177			Felix, J., R. Boydston, and I.C. Burke, Response of Direct-Seeded Dry Bulb Onion to Simulated Glyphosate Drift with Variable Rates and Application Timings. Weed Technology, 2017. 26(04): p. 747-756.	1/1/2017
2178			FIFRA Scientific Advisory Panel Meeting Minutes, Meeting	1/1/2017

			Minutes and Final Report of the December 13-16, 2016 FIFRA SAP Meeting Held to Consider and Review Scientific Issues Associated with EPA's Evaluation of the Carcinogenic Potential of Glyphasate, O.o.P. Programs, Editor. 2017, US Environmental Protection Agency: Washington, DC101.	
2179			Glyphosate in German adults - Time trend (2001 to 2015) of human exposure to a widely used herbicide; Conrad, International Journal of Hygiene and Environmental Health 220 (2017) S-16	1/1/2017
2180			Glyphosate in German adults – Time trend (2001 to 2015) of human exposure to a widely used herbicide; Conrad, International Journal of Hygiene and Environmental Health 220 (2017) S-16	1/1/2017
2181			Harre, N.T., et al., Distribution of Herbicide-Resistant Giant Ragweed (Ambrosia trifida) in Indiana and Characterization of Distinct Glyphosate-Resistant Biotypes. Weed Science, 2017. 65(06): p. 699-709.	1/1/2017
2182			Hong, Y., et al., Effects of glyphosate on immune responses and haemocyte DNA damage of Chinese mitten crab, Eriocheir sinensis. Fish Shellfish Immunol, 2017. 71: p. 19-27.	1/1/2017
2183			Hyland, C. and Ouahiba Laribi, 0., "Review of take-home pesticide exposure pathway in	1/1/2017

			children living in agricultural areas," 2017, Environmental Research. Volume 156, pg. 559-570.)	
2184			Illyassou, R. et al., Risk assessment for small farmers exposed to plant protection products in the Niger River Valley, Comm. Appl. Biol. Sci, Ghent University, 81/n, 2017.	1/1/2017
2185			Kašuba, V., et al., Effects of low doses of glyphosate on DNA damage, cell proliferation and oxidative stress in the HepG2 cell line 24 ENVIRON SCI POLLUT RES 19267-19281 (2017)	1/1/2017
2186			Kasuba, V., et al., Effects of low doses of glyphosate on DNA damage, cell proliferation and oxidative stress in the HepG2 cell line. Environ Sci Pollut Res Int, 2017. 24(23): p. 19267-19281.	1/1/2017
2187			Kniss, A.R., Long-term trends in the intensity and relative toxicity of herbicide use. Nat Commun, 2017. 8: p. 14865.	1/1/2017
2188			Kongtip, Pornpimol, Nankongnab, Noppanun, Phupancharoensuk, Ratanavadee, Palarach, Chonlada, Sujirarat, Dusit, Sangprasert, Supha, Sermsuk, Malasod, Sawattrakool, Namthip, & Woskie, Susan Renee. (2017). Glyphosate and Paraquat in Maternal and Fetal Serums in Thai Women. J Agromedicine, 22(3), 282-289. doi:10.1080/1059924x.2017.1319315.	1/1/2017
2189			Krenchinski, F.H., et al., Yield and physiological quality of	1/1/2017

			wheat seeds after desiccation with different herbicides. Journal of Seed Science, 2017. 39(3): p. 254-261.	
2190			Kwiatkowska, et al. DNA damage and methylation induced by glyphosate in human peripheral blood mononuclear cells (in vitro study), Food Chem Toxicol. 2017 Jul;105:93- 98. doi: 10.1016/j.fct.2017.03.051. Epub 2017 Mar 27.	1/1/2017
2191			Landrigan, P.J., et al., Letter to CDC from Health Professionals on the Health Hazards of Glyphosate. 2017.	1/1/2017
2192			Lei Luo, Fei Wang, Yiyuan Zhang, Ming Zeng, Caigao Zhong & Fang Xiao (2017), In vitro cytotoxicity assessment of roundup (glyphosate) in L-02 hepatocytes, Journal of Environmental Science and Health, Part B, DOI: 10.1080/03601234.2017.1293449	1/1/2017
2193			Lopez Gonzalez, E.C., et al., Micronuclei and other nuclear abnormalities on Caiman latirostris (Broad-snouted caiman) hatchlings after embryonic exposure to different pesticide formulations. Ecotoxicol Environ Saf, 2017. 136: p. 84-91.	1/1/2017
2194			Massimo Loda, et al., Pathology and Epidemiology of Cancer, Springer (2017) (Textbook)	1/1/2017
2195			Mendez, M.J. et al., Glyphosate and AMPA	1/1/2017

			contents in the respirable dust emitted by an agricultural soil of the central semiarid region of Argentina, Aeolian Research, 29 (2017): 23-29.	
2196			Mesnage, R. and M.N. Antoniou, Ignoring Adjuvant Toxicity Falsifies the Safety Profile of Commercial Pesticides. Front Public Health, 2017. 5: p. 361.	1/1/2017
2197			Mesnage, R., et al., Multiomics reveal non-alcoholic fatty liver disease in rats following chronic exposure to an ultra-low dose of Roundup herbicide. Nature Publishing Group, 2017: p. 1-15.	1/1/2017
2198			Mills, P.K., et al., Excretion of the Herbicide Glyphosate in Older Adults Between 1993 and 2016. JAMA, 2017. 318: p. 1610-1611.	1/1/2017
2199			Nardi, J., et al., Prepubertal subchronic exposure to soy milk and glyphosate leads to endocrine disruption. Food Chem Toxicol, 2017. 11: p. 247-252.	1/1/2017
2200			Olszyk, D., et al., Plant reproduction is altered by simulated herbicide drift to constructed plant communities. Environ Toxicol Chem, 2017. 36(10): p. 2799-2813.	1/1/2017
2201			Perry, M., Insights from Past Research Editor^Editors. 2017, Arlington, VA: 2017 Children's Environmental Health Translational Research Conference: New Challenges	1/1/2017
2202			Portier, C.J. and P. Clausing, Update to 'Re: Tarazona et al.	1/1/2017

			(2017): glyphosate toxicity and carcinogenicity: a review of the scientific basis of the European Union assessment and its differences with IARC. doi: 10.117/s1204-017-1962-5'. Arch Toxicol, 2018. 92(3): p. 1341.	
2203			Roberts, J., Introduction to Herbicides and Birth Outcomes in the Midwest, Editor^Editors. 2017, Arlington, VA: 2017 Children's Environmental Health Translational Research Conference: New Challenges	1/1/2017
2204			Roncevic, T., et al., PGLa-H tandem-repeat peptides active against multidrug resistant clinical bacterial isolates. Biochim Biophys Acta, 2017. 1859(2): p. 228-237.	1/1/2017
2205			Sawyer, W., Toxicological Risk Assessment For Glyphosate and Roundup® Formulations, Editor^Editors. 2017, the Miller Firm, LLC.	1/1/2017
2206			Sosnoskie, L.M., et al., Multiple Resistance in Palmer Amaranth to Glyphosate and Pyrithiobac Confirmed in Georgia. Weed Science, 2017. 59(03): p. 321-325.	1/1/2017
2207			Suarez-Larios K, et al. Screening of Pesticides with the Potential of Inducing DSB and Successive Recombinational Repair. 2017. Journal of Toxicology. Vol. 2017, Article ID 3574840.	1/1/2017
2208			Tafazoli, S., et al., Genotoxicity, acute and subchronic toxicity evaluation	1/1/2017

			of savory food ingredients. Regul Toxicol Pharmacol, 2017. 87: p. 71-87.	
2209			Tong, M., et al., Uptake, Translocation, Metabolism, and Distribution of Glyphosate in Nontarget Tea Plant (Camellia sinensis L.). Journal of Agricultural and Food Chemistry, 2017. 65: p. 7638-7646.	1/1/2017
2210			Townsend, M., Peck, C., Meng, W., Heaton, M., Robison, R., O'Neill, K., Evaluation of various glyphosate concentrations on DNA damage in human Raji cells and its impact on cytotoxicity, Regulatory Toxicology and Pharmacology (2017), doi: 10.1016/j.yrtph.2017.02.12. (2017. 85: p. 79-85.)	1/1/2017
2211			Vandenberg, L.N., et al., Is it time to reassess current safety standards for glyphosate-based herbicides? J Epidemiol Community Health, 2017. 71(6): p. 613-618.	1/1/2017
2212			Varayoud, J., et al., Effects of a glyphosate-based herbicide on the uterus of adult ovariectomized rats. Environ Toxicol, 2017. 32(4): p. 1191-1201.	1/1/2017
2213			Vazquez, M.A., et al., Association between Cancer and Environmental Exposure to Glyphosate. International Journal of Clinical Medicine, 2017. 08(02): p. 73-85.	1/1/2017
2214			Winchester, P.D., Emerging Science and Birth Center Challenges, Editor^Editors.	1/1/2017

			2017, Arlington, VA: 2017 Children's Environmental Health, Translational Research Conference: New Challenges	
2215			Zhang, T., et al., Early Application of Harvest Aid Herbicides Adversely Impacts Lentil. Agronomy Journal, 2017. 109(1): p. 239-248.	1/1/2017
2216			Expert Report of Dr. Christopher Portier (5/1/2017)	5/1/2017
2217			Rinsky JL, Richardson DB, Wing S, Beard JD, Alavanja M, Beane Freeman LE, Chen H, Henneberger PK, Kamel F, Sandler DP, Hoppin JA. Assessing the Potential for Bias From Nonresponse to a Study Follow-up Interview: An Example From the Agricultural Health Study. Am J Epidemiol. 2017 May 9. doi: 10.1093/aje/kwx098. [Epub ahead of print] Service. USDoANAS: Agricultural Chemical Usage - Field Crops and Potatoes. https://usda.mannlib.cornell.edu/MannUsda/viewDocumentInfo. do?documentID=111. Accessed 03 February 2016.(multiple years).	5/9/2017
2218			Exponent paper, Meta-Analysis of Glyphosate Use and Risk of Non-Hodgkin Lymphoma	5/24/2017
2219			Bus, J., "The dose makes the poison: Key implications for mode of action (mechanistic) research in a 2Lst century toxicology paradigm," 20L7, Current Opinion in Toxicology,I0.L0I6/|cotox.20I-7.06.013	6/13/2017

2220			Hua, et al., Study of the effect of occupational exposure to glyphosate on hepatorenal function. 2017 Jul 6;51 (7):615-620. doi: 10.3760/cma.j.issn.0253-9624.2017.07.18.	7/1/2017
2221			Dr. Christopher Portier Expert Rebuttal Report (8/18/2017)	8/18/2017
2222			Rebuttal Expert Report of Dr. Beate Ritz (8/18/2017)	8/18/2017
2223			Abraham, J., et al., Commercially formulated glyphosate can kill non-target pollinator bees under laboratory conditions. Entomologia Experimentalis et Applicata, 2018. 0(0).	1/1/2018
2224			Adami, et al. Textbook of Cancer Epidemiology 3rd Edition (2018)	1/1/2018
2225			Aitbali, Y., et al., Glyphosate based- herbicide exposure affects gut microbiota, anxiety and depression-like behaviors in mice. Neurotoxicol Teratol, 2018. 67: p. 44-49.	1/1/2018
2226			Alarcon, R., et al., Neonatal exposure to a glyphosate-based herbicide alters the histofunctional differentiation of the ovaries and uterus in lambs. Mol Cell Endocrinol, 2018	1/1/2018
2227			Alemeida, L.K.S., et al., Moderate levels of glyphosate and its formulations vary in their cytotoxicity and genotoxicity in a whole blood model and in human cell lines with different estrogen receptor status 8 BIOTECH 1-15 (2018)	1/1/2018

2228			Alonso, L.L., et al., Glyphosate and atrazine in rainfall and soils in agroproductive areas of the pampas region in Argentina. Sci Total Environ, 2018. 645: p. 89-96.	1/1/2018
2229			Altamirano, G.A., et al., Postnatal exposure to a glyphosate-based herbicide modifies mammary gland growth and development in Wistar male rats. Food Chem Toxicol, 2018. 118: p. 111-118.	1/1/2018
2230			Andreotti G., et al. Glyphosate Use and Cancer Incidence in the Agricultural Health Study. JNCI J Natl Cancer Inst (2018) 110(5): djx233 (2018. 110(5): p. 446-447.)	1/1/2018
2231			Anifandis, G., et al., The Effect of Glyphosate on Human Sperm Motility and Sperm DNA Fragmentation. Int J Environ Res Public Health, 2018. 15(6).	1/1/2018
2232			Antoniou, M.N., et al., Reply to 'Comments on two recent publications on GM maize and Roundup'. Sci Rep, 2018. 8(1): p. 13339.	1/1/2018
2233			Avdatek, F., et al., Ameliorative effect of resveratrol on testicular oxidative stress, spermatological parameters and DNA damage in glyphosate-based herbicide-exposed rats. Andrologia, 2018: p. e13036.	1/1/2018
2234			Bailey, D.C., et al., Chronic exposure to a glyphosate-containing pesticide leads to mitochondrial dysfunction and increased reactive oxygen	1/1/2018

			species production in Caenorhabditis elegans. Environ Toxicol Pharmacol, 2018. 57: p. 46-52.	
2235			Benbrook, C., Why Regulators Lost Track and Control of Pesticide Risks: Lessons From the Case of Glyphosate-Based Herbicides and Genetically Engineered-Crop Technology. Curr Environ Health Rep, 2018.	1/1/2018
2236			Benbrook, C.M., Why Regulators Lost Track and Control of Pesticide Risks: Lessons From the Case of Glyphosate-Based Herbicides and Genetically Engineered-Crop Technology. Curr Environ Health Rep, 2018.	1/1/2018
2237			Bento, C.P.M., et al., Spatial glyphosate and AMPA redistribution on the soil surface driven by sediment transport processes - A flume experiment. Environ Pollut, 2018. 234: p. 1011-1020.	1/1/2018
2238			Clausing, P., C. Robinson, and H. Burtscher-Schaden, Pesticides and public health: an analysis of the regulatory approach to assessing the carcinogenicity of glyphosate in the European Union. J Epidemiol Community Health, 2018. 72(8): p. 668-672	1/1/2018
2239			Connolly, A., et al., Characterising glyphosate exposures among amenity horticulturists using multiple spot urine samples. Int J Hyg Environ Health, 2018. 221(7): p. 1012-1022.	1/1/2018
2240			Connolly, A., et al., Exploring the half-life of glyphosate in	1/1/2018

			human urine samples. Int J Hyg Environ Health, 2018.	
2241			Connolly, A., et al., Glyphosate in Irish adults - A pilot study in 2017. Environ Res, 2018. 165: p. 235-236.	1/1/2018
2242			Dai, P., et al., The Herbicide Glyphosate Negatively Affects Midgut Bacterial Communities and Survival of Honey Bee during Larvae Reared in Vitro. J Agric Food Chem, 2018. 66(29): p. 7786-7793.	1/1/2018
2243			Davoren, M.J. and R.H. Schiestl, Glyphosate-based herbicides and cancer risk: a post-IARC decision review of potential mechanisms, policy and avenues of research. Carcinogenesis, 2018. 39(10): p. 1207-12005.	1/1/2018
2244			De Aguiar, L.M., et al., Corrigendum to "Glyphosate-based herbicide exposure causes antioxidant defence responses in the fruit fly Drosophila melanogaster previously published at BPC" [Comp. Biochem. Physiol. C 185-186 (2016) 94-101]. Comp Biochem Physiol C Toxicol Pharmacol, 2018. 205: p. 70-73.	1/1/2018
2245			De Almeida, L.K.S., B.I. Pletschke, and C.L. Frost, Moderate levels of glyphosate and its formulations vary in their cytotoxicity and genotoxicity in a whole blood model and in human cell lines with different estrogen receptor status. 3 Biotech, 2018. 8(10): p. 438.	1/1/2018

2246			Dedeke, G.A., et al., Comparative Assessment on Mechanism Underlying Renal Toxicity of Commercial Formulation of Roundup Herbicide and Glyphosate Alone in Male Albino Rat. Int J Toxicol, 2018. 37(4): p. 285-295.	1/1/2018
2247			Defarge, N., J. Spiroux de Vendomois, and G.E. Seralini, Toxicity of formulants and heavy metals in glyphosate-based herbicides and other pesticides. Toxicol Rep, 2018. 5: p. 156-163.	1/1/2018
2248			Dos Santos Teixeira, J.M., et al., Acute toxicity and effects of Roundup Original(R) on pintado da Amazonia. Environ Sci Pollut Res Int, 2018. 25(25): p. 25383-25389.	1/1/2018
2249			Douwes, J., et al., Carcinogenicity of glyphosate: why is New Zealand's EPA lost in the weeds? N Z Med J, 2018. 131(1472): p. 82-89.	1/1/2018
2250			Elsner, P., S. Darr-Foit, and S. Schliemann, Occupational koebnerization of psoriasis caused by glyphosate. J Dtsch Dermatol Ges, 2018. 16(1): p. 70-71.	1/1/2018
2251			Eriksson, D., et al., Comments on two recent publications on GM maize and Roundup. Sci Rep, 2018. 8(1): p. 13338.	1/1/2018
2252			Ferre, D.M., et al., Potential risks of dietary exposure to chlorpyrifos and cypermethrin from their use in fruit/vegetable crops and beef cattle productions. Environ	1/1/2018

			Monit Assess, 2018. 190(5): p. 292.	
2253			Fowle, J.R., Expert Report Regarding the Regulatory Review of Glyphosate, Editor^Editors. 2018, Inform, LLC.	1/1/2018
2254			Gallegos, C.E., et al., Perinatal Glyphosate-Based Herbicide Exposure in Rats Alters Brain Antioxidant Status, Glutamate and Acetylcholine Metabolism and Affects Recognition Memory. Neurotox Res, 2018. 34(3): p. 363-374.	1/1/2018
2255			Garcia-Espineira, M., L. Tejeda-Benitez, and J. Olivero-Verbel, Toxicity of atrazine- and glyphosate-based formulations on Caenorhabditis elegans. Ecotoxicol Environ Saf, 2018. 156: p. 2006-222.	1/1/2018
2256			Gigante, P., et al., Glyphosate affects swine ovarian and adipose stromal cell functions. Anim Reprod Sci, 2018.	1/1/2018
2257			Gould, F., Z.S. Brown, and J. Kuzma, Wicked evolution: Can we address the sociobiological dilemma of pesticide resistance? Science, 2018. 360: p. 728-732.	1/1/2018
2258			Green, J.M., The rise and future of glyphosate and glyphosate-resistant crops. Pest Manag Sci, 2018. 74(5): p. 1035-1039.	1/1/2018
2259			Guerrero Schimpf, M., et al., Glyphosate-based herbicide enhances the uterine sensitivity to estradiol in rats. J Endocrinol, 2018.	1/1/2018

2260			Hong, Y., et al., Antioxidative status, immunological responses, and heat shock protein expression in hepatopancreas of Chinese mitten crab, Eriocheir sinensis under the exposure of glyphosate. Fish Shellfish Immunol, 2018. 86: p. 840-845.	1/1/2018
2261			Hong, Y., et al., Assessment of the oxidative and genotoxic effects of the glyphosate-based herbicide roundup on the freshwater shrimp, Macrobrachium nipponensis. Chemosphere, 2018. 2000: p. 896-906.	1/1/2018
2262			Infante, P.F., et al., Commentary: IARC Monographs Program and public health under siege by corporate interests. Am J Ind Med, 2018. 61(4): p. 277-281.	1/1/2018
2263			Iummato, M.M., et al., Biochemical responses of the golden mussel Limnoperna fortunei under dietary glyphosate exposure. Ecotoxicol Environ Saf, 2018. 163: p. 69-75.	1/1/2018
2264			January 2018 Briefing Note for IARC Scientific and Governing Council members Prepared by the IARC Director	1/1/2018
2265			Jaramillo, M.L., et al., Evaluation of reference genes for reverse transcription-quantitative PCR assays in organs of zebrafish exposed to glyphosate-based herbicide, Roundup. Animal, 2018. 12(7): p. 1424-1434.	1/1/2018

2266			Jin, J., et al., Sub-lethal effects of herbicides penoxsulam, imazamox, fluridone and glyphosate on Delta Smelt (Hypomesus transpacificus). Aquat Toxicol, 2018. 197: p. 7988.	1/1/2018
2267			Karberg, K., D. Goldstein, and S.E. Dunn, Glyphosate Levels in Older Adults. JAMA, 2018. 319(13): p. 1384-1385.	1/1/2018
2268			Kawada, T., Glyphosate toxicity and carcinogenicity. EXCLI J, 2018. 17: p. 81-801.	1/1/2018
2269			Kittle, R.P., et al., Effects of glyphosate herbicide on the gastrointestinal microflora of Hawaiian green turtles (Chelonia mydas) Linnaeus. Mar Pollut Bull, 2018. 127: p. 170174.	1/1/2018
2270			Kondera, E., et al., Effect of glyphosate-based herbicide on hematological and hemopoietic parameters in common carp (Cyprinus carpio L). Fish Physiol Biochem, 2018. 44(3): p. 1011-1018.	1/1/2018
2271			Koo, D.H., et al., Extrachromosomal circular DNA-based amplification and transmission of herbicide resistance in crop weed Amaranthus palmeri. Proc Natl Acad Sci U S A, 2018. 115(13): p. 3332-3337.	1/1/2018
2272			Krimsky, S. and C. Gillam, Roundup litigation discovery documents: implications for public health and journal ethics. J Public Health Policy, 2018.	1/1/2018
2273			Kronberg, M.F., et al., Glyphosate-based herbicides	1/1/2018

			modulate oxidative stress response in the nematode Caenorhabditis elegans. Comp Biochem Physiol C Toxicol Pharmacol, 2018. 2004: p. 1-8.	
2274			Kuzel, et al. Up-to-Date, Section on Mycosis Fungoides (2018)	1/1/2018
2275			Landrigan, P.J. and F. Belpoggi, The need for independent research on the health effects of glyphosate-based herbicides. Environ Health, 2018. 17(1): p. 51.	1/1/2018
2276			Lopes, F.M., J.Z. Sandrini, and M.M. Souza, Toxicity induced by glyphosate and glyphosate-based herbicides in the zebrafish hepatocyte cell line (ZF-L). Ecotoxicol Environ Saf, 2018. 162: p. 201-207.	1/1/2018
2277			Lozano, V.L., et al., Sex-dependent impact of Roundup on the rat gut microbiome. Toxicol Rep, 2018. 5: p. 96-107.	1/1/2018
2278			Mao, Q., et al., The Ramazzini Institute 13-week pilot study on glyphosate and Roundup administered at human-equivalent dose to Sprague Dawley rats: effects on the microbiome. Environ Health, 2018. 17(1): p. 50.	1/1/2018
2279			Martinez, D.A., U.E. Loening, and M.C. Graham, Impacts of glyphosate-based herbicides on disease resistance and health of crops: a review. Environ Sci Eur, 2018. 30(1): p. 2.	1/1/2018
2280			McHenry, L.B., The Monsanto Papers: Poisoning the scientific well. Int J Risk Saf	1/1/2018

			Med, 2018. 29(3-4): p. 193-205.	
2281			Mesnage, R., et al., Author Correction: Multiomics reveal non-alcoholic fatty liver disease in rats following chronic exposure to an ultra-low dose of Roundup herbicide. Sci Rep, 2018. 8(1): p. 12572.	1/1/2018
2282			Mesnage, R., et al., Comparison of transcriptome responses to glyphosate, isoxaflutole, quizalofop-p-ethyl and mesotrione in the HepaRG cell line. Toxicol Rep, 2018. 5: p. 819826.	1/1/2018
2283			Milesi, M.M., et al., Perinatal exposure to a glyphosate-based herbicide impairs female reproductive outcomes and induces second-generation adverse effects in Wistar rats. Arch Toxicol, 2018. 92(8): p. 2629-2643.	1/1/2018
2284			Milic, M., et al., Oxidative stress, cholinesterase activity, and DNA damage in the liver, whole blood, and plasma of Wistar rats following a 28-day exposure to glyphosate. Arh Hig Rada Toksikol, 2018. 69(2): p. 154-168.	1/1/2018
2285			Mills, P.J., L.K. McEvoy, and G.A. Laughlin, Glyphosate Levels in Older Adults-Reply. JAMA, 2018. 319(13): p. 1385.	1/1/2018
2286			Motta, E.V.S., K. Raymann, and N.A. Moran, Glyphosate perturbs the gut microbiota of honey bees. Proc Natl Acad Sci U S A, 2018. 115(41): p. 10305-10310.	1/1/2018

2287			Nielsen, L.N., et al., Glyphosate has limited short-term effects on commensal bacterial community composition in the gut environment due to sufficient aromatic amino acid levels. Environ Pollut, 2018. 233: p. 364-376.	1/1/2018
2288			Novotny, E. Retraction by corruption: the 2012 Seralini paper. Journal of Biological Physics and Chemistry 2018, 18, 32-56.	1/1/2018
2289			Panzacchi, S., et al., The Ramazzini Institute 13-week study on glyphosate-based herbicides at human-equivalent dose in Sprague Dawley rats: study design and first in-life endpoints evaluation. Environ Health, 2018. 17(1): p. 52.	1/1/2018
2290			Persch, T.S.P., et al., Changes in intermediate metabolism and oxidative balance parameters in sexually matured three-barbeled catfishes exposed to herbicides from rice crops (Roundup((R)), Primoleo((R)) and Facet((R))). Environ Toxicol Pharmacol, 2018. 58: p. 170-179.	1/1/2018
2291			Rice, J.R., et al., Effects of Glyphosate and Its Formulations on Markers of Oxidative Stress and Cell Viability in Heparg and Hacat Cell Lines, National Toxicology Program (abstract, 2018)	1/1/2018
2292			Richmond, Martha E. (2018). Glyphosate: A review of its global use, environmental	1/1/2018

			impact, and potential health effects on humans and other species. Journal of Environmental Studies and Sciences. doi:10.117/s13412-018-0517-2.	
2293			Rossi, L.F., et al., Cytogenetic damage in peripheral blood cultures of Chaetophractus villosus exposed in vivo to a glyphosate formulation (Roundup). Ecotoxicol Environ Saf, 2018. 157: p. 121-127.	1/1/2018
2294			Samanta, P., et al., Histopathological and Ultrastructural Alterations in Some Organs of Oreochromis niloticus Exposed to Glyphosate-based Herbicide, Excel Mera 71. J Microsc Ultrastruct, 2018. 6(1): p. 35-43.	1/1/2018
2295			Santo, G.D., et al., Protective effect of Uncaria tomentosa extract against oxidative stress and genotoxicity induced by glyphosate-Roundup(R) using zebrafish (Danio rerio) as a model. Environ Sci Pollut Res Int, 2018. 25(12): p. 11703-11715.	1/1/2018
2296			Santovito, A., et al., In vitro evaluation of genomic damage induced by glyphosate on human lymphocytes. Environ Sci Pollut Res Int, 2018. 25(34): p. 34693-3471.	1/1/2018
2297			Silva, V., et al., Distribution of glyphosate and aminomethylphosphonic acid (AMPA) in agricultural topsoils of the European Union. Sci Total Environ, 2018. 621: p. 1352-1359.	1/1/2018

2298			Sritana, N., et al., Glyphosate induces growth of estrogen receptor alpha positive cholangiocarcinoma cells via non-genomic estrogen receptor/ERK1/2 signaling pathway. Food Chem Toxicol, 2018. 118: p. 595-607.	1/1/2018
2299			Stephenson, C.L., C.A. Harris, and R. Clarke, An assessment of the acute dietary exposure to glyphosate using deterministic and probabilistic methods. Food Addit Contam Part A Chem Anal Control Expo Risk Assess, 2018. 35(2): p. 258-272.	1/1/2018
2300			Székács, A. and B. Darvas, Re-registration challenges of glyphosate in the European Union (In Review). Frontiers in Environmental Science, 2018. In Review.	1/1/2018
2301			Van Bruggen, A.H.C., et al., Environmental and health effects of the herbicide glyphosate. Sci Total Environ, 2018. 616-617: p. 255-268.	1/1/2018
2302			Ward E. Glyphosate Use and Cancer Incidence in the Agricultural Health Study: An Epidemiologic Perspective. JNCI J Natl Cancer Inst (2018) 110(5): djx247	1/1/2018
2303			Wozniak, E., et al., The mechanism of DNA damage induced by Roundup 360 PLUS, glyphosate and AMPA in human peripheral blood mononuclear cells - genotoxic risk assessement. Food Chem Toxicol, 2018. 120: p. 510-522.	1/1/2018
2304			Yu, N., et al., Circular RNA expression profiles in	1/1/2018

			hippocampus from mice with perinatal glyphosate exposure. Biochem Biophys Res Commun, 2018. 501(4): p. 838-845.	
2305			Zoller, O., et al., Glyphosate residues in Swiss market foods: monitoring and risk evaluation. Food Addit Contam Part B Surveill, 2018. 11(2): p. 83-91.	1/1/2018
2306			OEHHA Glyphosate Prop 65	3/1/2018
2307			Parvez S. et al., Glyphosate exposure in pregnancy and shortened gestational length: a prospective Indiana birth cohort study, Envir. Health, online March 9, 2018.	3/9/2018
2308			Corrigendum - Brusick, et al	9/1/2018
2309			Corrigenda, Critical Reviews in Toxicology (Sept. 26, 2018)	9/26/2018
2310			Corrigendum - Acquavella, et al	9/26/2018
2311			Corrigendum - Solomon	9/26/2018
2312			Expression of Concern, Critical Reviews in Toxicology (first version)	9/26/2018
2313			IARC Monographs on the Evaluation of Carcinogenic Risks to Humans	11/9/2018
2314			Correction - Williams, et al	11/30/2018
2315			Corrigendum - Williams, et al	11/30/2018
2316			Expression of Concern, Critical Reviews in Toxicology, DOI: 10.1080/10408444.2018.1522786	11/30/2018
2317			Fung, K. et al., A Comparison of Tests for Trend with Historical Controls in Carcinogen Bioassay , 24 The Can. J of Stat.	12/15/2018
2318			Albanil Sanchez, J.A., et al., Histological evaluation of vital	1/1/2019

			organs of the livebearer Jenynsia multidentata (Jenyns, 1842) exposed to glyphosate: A comparative analysis of Roundup((R)) formulations. Chemosphere, 2019. 2007: p. 914-924.	
2319			Bali, Y.A., et al., Learning and memory impairments associated to acetylcholinesterase inhibition and oxidative stress following glyphosate based-herbicide exposure in mice. Toxicology, 2019. 415: p. 18-25.	1/1/2019
2320			Bhardwaj et al Effective Attenuation of glyphosate-induced oxidative stree and granulosa cell apoptosis by vitamins C and E in caprines. Mod Reprod Dev 2019, 86, 42-52	1/1/2019
2321			Centner, T.J., L. Russell, and M. Mays, Viewing evidence of harm accompanying uses of glyphosate-based herbicides under US legal requirements. Sci Total Environ, 2019. 648: p. 609-617.	1/1/2019
2322			Connolly, A., et al., Evaluating Glyphosate Exposure Routes and Their Contribution to Total Body Burden: A Study Among Amenity Horticulturalists. Ann Work Expo Health, 2019.	1/1/2019
2323			Gillezeau, C., et al., The evidence of human exposure to glyphosate: a review. Environ Health, 2019. 18(1): p. 2.	1/1/2019
2324			Gomez, A.L., et al., Male mammary gland development and methylation status of	1/1/2019

			estrogen receptor alpha in Wistar rats are modified by the developmental exposure to a glyphosate-based herbicide. Mol Cell Endocrinol, 2019. 481: p. 14-25	
2325			Lorenz, V., et al., Epigenetic disruption of estrogen receptor alpha is induced by a glyphosate-based herbicide in the preimplantation uterus of rats. Mol Cell Endocrinol, 2019. 480: p. 133-141.	1/1/2019
2326			Plewis, I., Comment on: Perinatal exposure to a glyphosate-based herbicide impairs female reproductive outcomes and induces second-generation adverse effects in Wistar rats. Arch Toxicol, 2019. 93(1): p. 207.	1/1/2019
2327			Rainio, M.J., et al., Effects of a glyphosate-based herbicide on survival and oxidative status of a non-target herbivore, the Colorado potato beetle (Leptinotarsa decemlineata). Comp Biochem Physiol C Toxicol Pharmacol, 2019. 2005: p. 47-55.	1/1/2019
2328			Sheppard, L. and Shaffer, R.M. Re: Glyphosate Use and Cancer Incidence in the Agricultural Health Study. JNCI J Natl Cancer Inst 2019, 111, 1-2.	1/1/2019
2329			Gannon The essesntial role of peer review, EMBO Rep. 2001 Sep 15; 2(9): 743.	0/0/2001
2330			Review of Genotoxicity Studies of Glyphosate and Glyphosate-Based Formulations	00/00/0000
2331			ICJME guidelines for "Conflicts of Interest."	0/0/2017

2332			Republished study: long-term toxicity of a Roundup herbicide and a Roundup-tolerant genetically modified maize	00/00/0000
2333			Zhang, L., Rana, L., Taioli, E., Shaffer, R.M., and Sheppard, L. Exposure to Glyphosate-Based Herbicides and Risk for Non-Hodgkin Lymphoma: A Meta-Analysis and Supporting Evidence, Mutation Research 2019	1/1/2019
2334			Sung, Et al., Emerging cancer trends among young adults in the USA: analysis of a population-based cancer registry, The Lancet, Published online February 4, 2019	2/4/2019
2335			Friedman GD, Quesenberry CP, Jr. Spousal concordance for cancer incidence: A cohort study. Cancer. Dec 1 1999;86(11):2413-2419.	12/1/1999
2336			Weires M, Bermejo JL, Sundquist J, Hemminki K. Clustering of concordant and discordant cancer types in Swedish couples is rare. European journal of cancer. Jan 2011;47(1):98-106.	1/1/2011
2337			Villeneuve, et al., Increased frequency of hematopoietic malignancies in relatives of patients with lymphoid neoplasms: a French case-control study, Int J Cancer. 2009 March; 124(5): 1188–95. doi: 10.1002/ijc.24026.	1/1/2009
2338			Islami, et al. Proportion of Cancer Cases Attributable to Excess Body Weight by US State, 2011-2015, JAMA Onc.	12/27/2018

			Published online December 27, 2018.	
2339			Machado-Neto, J. et al., Safety of Working Conditions of Glyphosate Applicators on Eucalyptus Forests Using Knapsack and Tractor Powered Sprayers, 64 Bull. Environ. Contam. Toxicol. 309 (2000).	1/1/2000
2340			Rubenstein JL, Hsi ED, Johnson JL, et al. Intensive chemotherapy and immunotherapy in patients with newly diagnosed primary CNS lymphoma: CALGB 50202 (Alliance 50202). J Clin Oncol. Sep 1 2013;31(25):3061-3068.	9/1/2013
2341			Evens AM, Choquet S, Kroll-Desrosiers AR, et al. Primary CNS posttransplant lymphoproliferative disease (PTLD): an international report of 84 cases in the modern era. American journal of transplantation : official journal of the American Society of Transplantation and the American Society of Transplant Surgeons. Jun 2013;13(6):1512-1522.	6/1/2013
2342			Al-Mansour Z, Nelson BP, Evens AM. Post-transplant lymphoproliferative disease (PTLD): risk factors, diagnosis, and current treatment strategies. Current hematologic malignancy reports. Sep 2013;8(3):173-183.	9/1/2013
2343			Rubenstein JL, Gupta NK, Mannis GN, Lamarre AK, Treseler P. How I treat CNS lymphomas. Blood. Oct 3 2013;122(14):2318-2330.	10/3/2013

2344			Willett EV, Morton LM, Hartge P, et al. Non-Hodgkin lymphoma and obesity: a pooled analysis from the InterLymph Consortium. International journal of cancer. May 1 2008;122(9):2062- 2070.	5/1/2008
2345			Swerdlow SH, Campo E, Pileri SA, et al. The 2016 revision of the World Health Organization classification of lymphoid neoplasms. Blood. May 19 2016;127(20):2375-2390.	5/19/2016
2346			Fallah M, Liu X, Ji J, Forsti A, Sundquist K, Hemminki K. Autoimmune diseases associated with non-Hodgkin lymphoma: a nationwide cohort study. Ann Oncol. Oct 2014;25(10):2025-2030.	10/1/2014
2347			Siegel CA, Marden SM, Persing SM, Larson RJ, Sands BE. Risk of lymphoma associated with combination anti-tumor necrosis factor and immunomodulator therapy for the treatment of Crohn's disease: a meta-analysis. Clinical gastroenterology and hepatology : the official clinical practice journal of the American Gastroenterological Association. Aug 2009;7(8):874-881.	8/1/2009
2348			Siegel C. Risk of Lymphoma in Inflammatory Bowel Disease. Gastroenterology & Hepatology. November 2009 2009;5(11):784-790.	11/1/2009
2349			Benbrook, C.M., How Did the Us Epa and IARC Reach Diametrically Opposed Conclusions on the	1/1/2019

			Genotoxicity of Glyphosate-Based Herbicides? Environmental Sciences Europe, 2019. 31(1): p. 2.	
2350			Holm, L.E., Blomgren, H., and Lowhagen, T., Cancer Risks in Patients with Chronic Lymphocytic Thyroiditis. N Engl J Med, 1985. 312(10): p. 601-604.	1/1/1985
2351			Kato, I., Tajima, K., Suchi, T., Aozasa, K., Matsuzuka, F., Kuma, K., and Tominaga, S., Chronic Thyroiditis as a Risk Factor of B-Cell Lymphoma in the Thyroid Gland. Jpn J Cancer Res, 1985. 76(11): p. 1085-1090.	1/1/1985
2352			Hemminki, K., Li, X., Sundquist, J., and Sundquist, K., Cancer Risks in Ulcerative Colitis Patients. Int J Cancer, 2008. 123(6): p. 1417-1421.	1/1/2008
2353			Chapuy, B., Roemer, M.G., Stewart, C., Tan, Y., Abo, R.P., Zhang, L., Dunford, A.J., Meredith, D.M., Thorner, A.R., Jordanova, E.S., Liu, G., Feuerhake, F., Ducar, M.D., Illerhaus, G., Gusenleitner, D., Linden, E.A., Sun, H.H., Homer, H., Aono, M., Pinkus, G.S., Ligon, A.H., Ligon, K.L., Ferry, J.A., Freeman, G.J., van Hummelen, P., Golub, T.R., Getz, G., Rodig, S.J., de Jong, D., Monti, S., and Shipp, M.A., Targetable Genetic Features of Primary Testicular and Primary Central Nervous System Lymphomas. Blood, 2016. 127(7): p. 869-881.	1/1/2016
2354			Chapuy, B., Tropism of Pcnsl: Is It All About Autoantigens?	1/1/2018

			Blood, 2018. 132(26): p. 2704-2706.	
2355			Thurner, L., Preuss, K.D., Bewarder, M., Kemele, M., Fadle, N., Regitz, E., Altmeyer, S., Schormann, C., Poeschel, V., Ziepert, M., Walter, S., Roth, P., Weller, M., Szczepanowski, M., Klapper, W., Monoranu, C., Rosenwald, A., Moller, P., Hartmann, S., Hansmann, M.L., Mackensen, A., Schafer, H., Schorb, E., Illerhaus, G., Buslei, R., Bohle, R.M., Stilgenbauer, S., Kim, Y.J., and Pfreundschuh, M., Hyper-N-Glycosylated Samd14 and Neurabin-I as Driver Autoantigens of Primary Central Nervous System Lymphoma. Blood, 2018. 132(26): p. 2744-2753.	1/1/2018
2356			Montesinos-Rongen, M., Purschke, F.G., Brunn, A., May, C., Nordhoff, E., Marcus, K., and Deckert, M., Primary Central Nervous System (Cns) Lymphoma B Cell Receptors Recognize Cns Proteins. J Immunol, 2015. 195(3): p. 1312-1319.	1/1/2015
2357			Montesinos-Rongen, M., Kuppers, R., Schluter, D., Spieker, T., Van Roost, D., Schaller, C., Reifenberger, G., Wiestler, O.D., and Deckert-Schluter, M., Primary Central Nervous System Lymphomas Are Derived from Germinal-Center B Cells and Show a Preferential Usage of the V4-34 Gene Segment. Am J Pathol, 1999. 155(6): p. 2077-2086.	1/1/1999

2358			Cerhan, J.R., Kricker, A., Paltiel, O., Flowers, C.R., Wang, S.S., Monnereau, A., Blair, A., Dal Maso, L., Kane, E.V., Nieters, A., Foran, J.M., Miligi, L., Clavel, J., Bernstein, L., Rothman, N., Slager, S.L., Sampson, J.N., Morton, L.M., and Skibola, C.F., Medical History, Lifestyle, Family History, and Occupational Risk Factors for Diffuse Large B-Cell Lymphoma: The Interlymph Non-Hodgkin Lymphoma Subtypes Project. J Natl Cancer Inst Monogr, 2014. 2014(48): p. 15-25.	1/1/2014
2359			Vajdic, C.M., Falster, M.O., de Sanjose, S., Martinez-Maza, O., Becker, N., Bracci, P.M., Melbye, M., Smedby, K.E., Engels, E.A., Turner, J., Vineis, P., Costantini, A.S., Holly, E.A., Kane, E., Spinelli, J.J., La Vecchia, C., Zheng, T., Chiu, B.C., Dal Maso, L., Cocco, P., Maynadie, M., Foretova, L., Staines, A., Brennan, P., Davis, S., Severson, R., Cerhan, J.R., Breen, E.C., Birmann, B., Cozen, W., and Grulich, A.E., Atopic Disease and Risk of Non-Hodgkin Lymphoma: An Interlymph Pooled Analysis. Cancer Res, 2009. 69(16): p. 6482-6489.	1/1/2009
2360			Rahman, M.U., Poe, D.S., and Choi, H.K., Autoimmune Vestibulo-Cochlear Disorders. Curr Opin Rheumatol, 2001. 13(3): p. 184-189.	1/1/2001
2361			Anderson, L.A., Gadalla, S., Morton, L.M., Landgren, O., Pfeiffer, R., Warren, J.L.,	1/1/2009

			Berndt, S.I., Ricker, W., Parsons, R., and Engels, E.A., Population-Based Study of Autoimmune Conditions and the Risk of Specific Lymphoid Malignancies. Int J Cancer, 2009. 125(2): p. 398-405.	
2362			Ekström Smedby, K., Vajdic, C.M., Falster, M., Engels, E.A., Martínez-Maza, O., Turner, J., Hjalgrim, H., Vineis, P., Seniori Costantini, A., Bracci, P.M., Holly, E.A., Willett, E., Spinelli, J.J., La Vecchia, C., Zheng, T., Becker, N., De Sanjosé, S., Chiu, B.C.-H., Dal Maso, L., Cocco, P., Maynadié, M., Foretova, L., Staines, A., Brennan, P., Davis, S., Severson, R., Cerhan, J.R., Breen, E.C., Birmann, B., Grulich, A.E., and Cozen, W., Autoimmune Disorders and Risk of Non-Hodgkin Lymphoma Subtypes: A Pooled Analysis within the Interlymph Consortium. Blood, 2008. 111(8): p. 4029-4038.	1/1/2008
2363			Goldin, L.R. and Landgren, O., Autoimmunity and Lymphomagenesis. Int J Cancer, 2009. 124(7): p. 1497-1502.	1/1/2009
2364			Zuckerman, E., Zuckerman, T., Levine, A.M., Douer, D., Gutekunst, K., Mizokami, M., Qian, D.G., Velankar, M., Nathwani, B.N., and Fong, T.L., Hepatitis C Virus Infection in Patients with B-Cell Non-Hodgkin Lymphoma. Ann Intern Med, 1997. 127(6): p. 423-428.	1/1/1997

2365			Franzin, F., Efremov, D.G., Pozzato, G., Tulissi, P., Batista, F., and Burrone, O.R., Clonal B-Cell Expansions in Peripheral Blood of Hcv-Infected Patients. Br J Haematol, 1995. 90(3): p. 548-552.	1/1/1995
2366			Lewis, J.D., Bilker, W.B., Brensinger, C., Deren, J.J., Vaughn, D.J., and Strom, B.L., Inflammatory Bowel Disease Is Not Associated with an Increased Risk of Lymphoma. Gastroenterology, 2001. 121(5): p. 1080-1087.	1/1/2001
2367			Bernstein, C.N., Blanchard, J.F., Kliewer, E., and Wajda, A., Cancer Risk in Patients with Inflammatory Bowel Disease. Cancer, 2001. 91(4): p. 854-862.	1/1/2001
2368			Karlen, P., Lofberg, R., Brostrom, O., Leijonmarck, C.E., Hellers, G., and Persson, P.G., Increased Risk of Cancer in Ulcerative Colitis: A Population-Based Cohort Study. Am J Gastroenterol, 1999. 94(4): p. 1047-1052.	1/1/1999
2369			Winther, K.V., Jess, T., Langholz, E., Munkholm, P., and Binder, V., Long-Term Risk of Cancer in Ulcerative Colitis: A Population-Based Cohort Study from Copenhagen County. Clin Gastroenterol Hepatol, 2004. 2(12): p. 1088-1095.	1/1/2004
2370			Greenstein, A.J., Mullin, G.E., Strauchen, J.A., Heimann, T., Janowitz, H.D., Aufses, A.H., Jr., and Sachar, D.B., Lymphoma in Inflammatory	1/1/1992

			Bowel Disease. Cancer, 1992. 69(5): p. 1119-1123.	
2371			Askling, J., Brandt, L., Lapidus, A., Karlén, P., Björkholm, M., Löfberg, R., and Ekbom, A., Risk of Haematopoietic Cancer in Patients with Inflammatory Bowel Disease. Gut, 2005. 54(5): p. 617-622.	1/1/2005
2372			Kandiel, A., Fraser, A.G., Korelitz, B.I., Brensinger, C., and Lewis, J.D., Increased Risk of Lymphoma among Inflammatory Bowel Disease Patients Treated with Azathioprine and 6-Mercaptopurine. Gut, 2005. 54(8): p. 1121-1125.	1/1/2005
2373			Farrell, R.J., Ang, Y., Kileen, P., O'Briain, D.S., Kelleher, D., Keeling, P.W., and Weir, D.G., Increased Incidence of Non-Hodgkin's Lymphoma in Inflammatory Bowel Disease Patients on Immunosuppressive Therapy but Overall Risk Is Low. Gut, 2000. 47(4): p. 514-519.	1/1/2000
2374			Pardridge, William. The Blood-Brain Barrier: Bottleneck in Brain Drug Development. NeuroRx®: The Journal of the American Society for Experimental NeuroTherapeutics 2: 3-14, 2005.	1/1/2005
2375			National Comprehensive Cancer Network®. Chemotherapy Order Template, Diffuse Large B-Cell Lymphoma, R-CHOP (Cyclophosphamide/DOXOrubicin/VinCRIStine/PrednISONE + Rituximab). 2016	1/1/2016

2376			Chemocare.com: Care During Chemotherapy and Beyond.	
2377			Portlock, Carol. How should you treat a patient with developed "chemo brain" after R-CHOP. ASH Clinical News, November 2017.	11/1/2017
2378			Varney, N.R., Wu, J., Pinkston, J. and Morrow, L. PET scan findings on a patient with a past history of substantial organic solvent exposure. Applied Neuropsychology, 1998, 5, 100-106.	1/1/1998
2379			Varney, N.R., Swan, C. and Morrow, L. Dichotic listening in patients with long term exposure to organic solvents. The Clinical Neuropsychologist, 1998, 12, 107-112.	1/1/1998
2380			Verwer, N., Murali, R., Winstanley, J., Cooper, W.A., Stretch, J.R., Thompson, J.F., and Scolyer, R.A., Lymphoma Occurring in Patients with Cutaneous Melanoma. J Clin Pathol, 2010. 63(9): p. 777-781.	1/1/2010
2381			Castillo, J.J., Mull, N., Reagan, J.L., Nemr, S., and Mitri, J., Increased Incidence of Non-Hodgkin Lymphoma, Leukemia, and Myeloma in Patients with Diabetes Mellitus Type 2: A Meta-Analysis of Observational Studies. Blood, 2012. 119(21): p. 4845-4850.	1/1/2012
2382			Nugent, Z., Demers, A.A., Wiseman, M.C., Mihalcioiu, C., and Kliewer, E.V., Risk of Second Primary Cancer and Death Following a Diagnosis of	1/1/2005

			Nonmelanoma Skin Cancer. Cancer Epidemiol Biomarkers Prev, 2005. 14(11 Pt 1): p. 2584-2590.	
2383			Lu, Y., Wang, S.S., Reynolds, P., Chang, E.T., Ma, H., Sullivan-Halley, J., Clarke, C.A., and Bernstein, L., Cigarette Smoking, Passive Smoking, and Non-Hodgkin Lymphoma Risk: Evidence from the California Teachers Study. Am J Epidemiol, 2011. 174(5): p. 563-573.	1/1/2011
2384			Boffetta, P. and de Vocht, F., Occupation and the Risk of Non-Hodgkin Lymphoma. Cancer Epidemiol Biomarkers Prev, 2007. 16(3): p. 369-372.	1/1/2007
2385			Cho, H.G., Kuo, K.Y., Li, S., Bailey, I., Aasi, S., Chang, A.L.S., Oro, A.E., Tang, J.Y., and Sarin, K.Y., Frequent Basal Cell Cancer Development Is a Clinical Marker for Inherited Cancer Susceptibility. JCI Insight, 2018. 3(15).	1/1/2018
2386			Blomberg, M., Friis, S., Munk, C., Bautz, A., and Kjaer, S.K., Genital Warts and Risk of Cancer: A Danish Study of Nearly 50 000 Patients with Genital Warts. J Infect Dis, 2012. 205(10): p. 1544-1553.	1/1/2012
2387			Riou, J.P., Ariyan, S., Brandow, K.R., and Fielding, L.P., The Association between Melanoma, Lymphoma, and Other Primary Neoplasms. Arch Surg, 1995. 130(10): p. 1056-1061.	1/1/1995
2388			Adami, J., Frisch, M., Yuen, J., Glimelius, B., and Melbye, M., Evidence of an Association	1/1/1995

			between Non-Hodgkin's Lymphoma and Skin Cancer. BMJ, 1995. 310(6993): p. 1491-1495.	
2389			Kricker, A., Armstrong, B.K., Hughes, A.M., Goumas, C., Smedby, K.E., Zheng, T., Spinelli, J.J., De Sanjose, S., Hartge, P., Melbye, M., Willett, E.V., Becker, N., Chiu, B.C., Cerhan, J.R., Maynadie, M., Staines, A., Cocco, P., Boffeta, P., and Interlymph, C., Personal Sun Exposure and Risk of Non Hodgkin Lymphoma: A Pooled Analysis from the Interlymph Consortium. Int J Cancer, 2008. 122(1): p. 144-154.	1/1/2008
2390			Kamb, A., Gruis, N.A., Weaver-Feldhaus, J., Liu, Q., Harshman, K., Tavtigian, S.V., Stockert, E., Day, R.S., 3rd, Johnson, B.E., and Skolnick, M.H., A Cell Cycle Regulator Potentially Involved in Genesis of Many Tumor Types. Science, 1994. 264(5157): p. 436-440.	1/1/1994
2391			Healy, E., Sikkink, S., and Rees, J.L., Infrequent Mutation of P16ink4 in Sporadic Melanoma. J Invest Dermatol, 1996. 107(3): p. 318-321.	1/1/1996
2392			Drexler, H.G., Review of Alterations of the Cyclin-Dependent Kinase Inhibitor Ink4 Family Genes P15, P16, P18 and P19 in Human Leukemia-Lymphoma Cells. Leukemia, 1998. 12(6): p. 845-859.	1/1/1998
2393			Marigo, I., Dolcetti, L., Serafini, P., Zanovello, P., and Bronte,	1/1/2008

			V., Tumor-Induced Tolerance and Immune Suppression by Myeloid Derived Suppressor Cells. Immunol Rev, 2008. 222: p. 162-179.	
2394			Frisch, M., Hjalgrim, H., Olsen, J.H., and Melbye, M., Risk for Subsequent Cancer after Diagnosis of Basal-Cell Carcinoma. A Population-Based, Epidemiologic Study. Ann Intern Med, 1996. 125(10): p. 815-821.	1/1/1996
2395			Frisch, M. and Melbye, M., New Primary Cancers after Squamous Cell Skin Cancer. Am J Epidemiol, 1995. 141(10): p. 916-922.	1/1/1995
2396			Hemminki, K. and Dong, C., Subsequent Cancers after in Situ and Invasive Squamous Cell Carcinoma of the Skin. Arch Dermatol, 2000. 136(5): p. 647-651.	1/1/2000
2397			Caini, S., Boniol, M., Botteri, E., Tosti, G., Bazolli, B., Russell-Edu, W., Giusti, F., Testori, A., and Gandini, S., The Risk of Developing a Second Primary Cancer in Melanoma Patients: A Comprehensive Review of the Literature and Meta-Analysis. J Dermatol Sci, 2014. 75(1): p. 3-9.	1/1/2014
2398			Kahn, H.S., Tatham, L.M., Patel, A.V., Thun, M.J., and Heath, C.W., Jr., Increased Cancer Mortality Following a History of Nonmelanoma Skin Cancer. JAMA, 1998. 280(10): p. 910-912.	1/1/1998
2399			Hjalgrim, H., Frisch, M., Storm, H.H., Glimelius, B., Pedersen, J.B., and Melbye, M., Non-	1/1/2000

			Melanoma Skin Cancer May Be a Marker of Poor Prognosis in Patients with Non-Hodgkin's Lymphoma. Int J Cancer, 2000. 85(5): p. 639-642.	
2400	MONGLY00358401	MONGLY00358420	Evaluacion de los efectos del glifosoato y otros plaguicidas en la salud humana en zonaas objeto del programa de erradicacion de cultivos ilicots; Varona et al , Viomedica 2009:29:456-75	00/00/2009
2401	MONGLY00301671	MONGLY00301677	Development and validation of liquid chromotagoraphy-fluorescence-mass spectrometry method to measure glyphosate and aminomethylphosphonic acid in rat plasma, Bernal, Journal of Chromatography B, 878 (2010) 3290-3296	00/00/2010
2402	MONGLY00303109	MONGLY00303116	Efficacy of skin wash on dermal absorption: an in vitro study on four model compounds of varying solubility; Nielson, Int. Arch Occup Envoron Health (2010)	00/00/2010
2403	MONGLY00329945	MONGLY00329951	Dermal exposure assessment of pesticide use: The case of sprayers in potato farms in the Columbian highlands; Lesmes-Fabian, et al, Science of the Total Environment 430 (2012) 202-208	00/00/2012
2404	MONGLY02136009	MONGLY02136018	A critical review of glyphosate findings in human urine samples and comparison with the exposure of operators and consumers; niemann, et al, J. Verbr. Lebensm. DOI 10.1007/s00003-014-0927-3	00/00/2015
2405	MONGLY02431080	MONGLY02431087	Wester et al., Glyphosate Skin Binding Absorption, Residual Tissue Distribution and Skin	12/28/1990

			Decontamination, 16 Fundamental and Application Toxicology 725, at 728-730	
2406	MONGLY02136019	MONGLY02136031	Urinary Pesticide Concentrations Among Children, MOhters and Tahters Living in Farm and Non-Farm Households in Iowa; Curwin, et al, Ann Occup Hyg pp 1-13	09/11/2016
2407			Monsanto Company's Amended Responses and Objections to Plaintiffs' First Set of Requests for Admissions Nos. 4, 6-7, and 31	2019-01-22
2408			Monsanto Company's Response and Ojbections to Plaintiffs' First Set of Requrests for Admissions	
2409	Done		Deposition Transcript Dr. Born	1/29/2019
2410			Deposition Transcript Dr. Rubenstein	2/7/2019
2411			Rubenstein Exhibit 1 History & Physical, 9/7/2016, AP-07-000004 through 000007	
2412			Rubenstein Exhibit 2 Alberta's hospitalizations and rehabilitation admissions since beginning chemo	
2413			Deposition Transcript Dr. Gupta	1/23/2019
2414			Deposition Transcript Dr. Raj	1/8/2019
2415			Deposition Transcript of Dr. Celeste Bello	2/6/2019
2416			Deposition Transcript of Dr. Phalen	2/20/2019
2417			Depostion Transcript of Alberta Pilliod	12/20/2018
2418			Deposition Transcript of Alva Pilliod	12/21/2018
2419			Pilliods - Short Chronologies of Medical and Exposure History	
2420			Pilliod, Alva Deposition Exhibit 3 - Photograph	

2421			Pilliod, Alva Deposition Exhibit 3-A - Photograph, 6 total	
2422			Pilliod, Alva Deposition Exhibit 3-B - Photographs, 5 total	
2423			Pilliod, Alva Deposition Exhibit 3-C Photographs - 3 total	
2424	AP-01-000001-000034		Pilliod, Alva - Dr. Raj Medical records	
2425	AP-02-000001-000032		Pilliod, Alva - Dr. Kavitha P. Raj, MD Medical records	
2426	AP-06-000001-000259		Pilliod, Alva - Dr. Tsung Wong Medical Records	
2427	AP-03-000001-001450		Pilliod, Alva - Pilliod, Alva Valleycare Health System	
2428	AP-05-000001-000121		Pilliod, Alva - Stanford Hospital and Clinics	
2429	AP-04-000001-000623		Pilliod, Alva - Pilliod, Alva UCSF Epilepsy Center Medical Records	
2430	AP-07-000001-000016		Pilliod, Alva - Nor Cal Imaging Pleasntion Medical Records	
2431	000001-000013		Pilliod, Alva - Defendant 01 SSARetirementandDisability_00000001_00000013	
2432	000001-000003		Pilliod, Alva - Defendant 02 InternalRevenueSvcRAIVSTeam_00000001_00000003	
2433	000004-000206		Pilliod, Alva - Defendant 03 InternalRevenueSvcRAIVSTeam_00000004_00000206	
2434	000001-000032		Pilliod, Alva - Defendant 04 Pilliod, Alva ValleyMedOncologyConsultants_00000001_00000032	
2435	000001-000273		Pilliod, Alva - Defendant 05 TriPilliod, Alva ValleyMedAssocsMedRecsDept_00000001_00000273	
2436	000001-000750		Pilliod, Alva - Defendant 06 Pilliod, Alva ValleyCareMedCtrMedRecsDept_00000001_00000750	

2437	000751-0001395		Pilliod, Alva - Defendant 07 Pilliod, Alva ValleyCareMedCtrMedRecsDept_00000751_00001395	
2438	000003-00004		Pilliod, Alva - Defendant 08 Pilliod, Alva ValleyCareMedCtrRadDept_00000003_00000004	
2439	000001-000002		Pilliod, Alva - Defendant 09 Pilliod, Alva ValleyCareMedCtrRadDept_00000001_00000002	
2440	001396-001396		Pilliod, Alva - Defendant 10 Pilliod, Alva ValleyCareMedCtrMedRecsDept_00001396_00001396	
2441	000005-000006		Pilliod, Alva - Defendant 11 Pilliod, Alva ValleyCareMedCtrRadDept_00000005_00000006	
2442	000001-000001		Pilliod, Alva - Defendant 12 Pilliod, Alva ValleyCareMedCtrPathDept_00000001_00000001	
2443	000001-000001		Pilliod, Alva - Defendant 13 GoodyearTireAndRubberCompanyHRs_00000001_00000001	
2444	000001-000013		Pilliod, Alva - Defendant 14 Pilliod, Alva StanfordHealthCarePatientAccts_00000001_00000013	
2445	000001-000100		Pilliod, Alva - Defendant 15 Pilliod, Alva UCSFMedCtrMedRecsDept_00000001_00000100	
2446	000101-000189		Pilliod, Alva - Defendant 16 Pilliod, Alva UCSFMedCtrMedRecsDept_00000101_00000189	
2447	000001-000046		Pilliod, Alva - Defendant 17 Pilliod, Alva UCSFMedCtrPatientFinancialSvcs_00000001_00000046	

2448	000001-000001		Pilliod, Alva - Defendant 18 DhanoaTeginderSMD_00000001_00000001	
2449	000001-000010		Pilliod, Alva - Defendant 19 LinStanMDPatientAccts_00000001_00000010	
2450	000001-000001		Pilliod, Alva - Defendant 20 Pilliod, Alva ValleySurgicalGroup_00000001_00000001	
2451	000001-000066		Pilliod, Alva - Defendant 21 GoldenStateDermatology_00000001_00000066	
2452	000067-000139		Pilliod, Alva - Defendant 22 GoldenStateDermatology_00000067_00000139	
2453	000001-000001		Pilliod, Alva - Defendant 23 EspinasOscarEMD_00000001_00000001	
2454	000001-000012		Pilliod, Alva - Defendant 24 LinDavidMDPhd_00000001_00000012	
2455	000001-000001		Pilliod, Alva - Defendant 25 WashingtonTownshipMedFoundationNewarkClinic_00000001_00000001	
2456	AP-10-000001-000097		Pilliod, Alva - Dr. Greenberg medical and billing records	
2457	AP-08-000001-000044		Pilliod, Alva - Dr. Wong Billing records	
2458	AP-13-000001-000005		Pilliod, Alva - Dr. Raj Billing Records	
2459	AP-15-000001-000096		Pilliod, Alva - Stanford Health Medical Records	
2460	AP-11-000001-000165		Pilliod, Alva - Stanford Hlth	
2461	AP-12-000001-000013		Pilliod, Alva - Stanford neuroscience	
2462	AP-09-00001-000449		Pilliod, Alva - Pilliod, Alva UCSF Epilepy Center Records	
2463	AP-24-00001-000043		Pilliod, Alva - UCSF Epilepsy Center Medical Records	

2464	AP-16-00001-000016		Pilliod, Alva - Walgreens Medical Records	
2465	AP-17-00001-000002		Pilliod, Alva - Wal Mart Stores INC CA	
2466	AP-25-000001-000018		Pilliod, Alva - NorCal Imaging Medical Records	
2467	AP-14-000001-000051		PIlliod, Alva - EOB and records from client	
2468	000001-000001		Pilliod, Alva - AdvancedCardiovascularInstitute_00000001_00000001	
2469	000002-000004		Pilliod, Alva - AdvancedCardiovascularInstitute_00000002_00000004	
2470	000001-000001		Pilliod, Alva - ColumbusDistributingHRs_00000001_00000001	
2471	000001-000164		Pilliod, Alva - EastBayCtrforDermatologyCosmeticandLaserSurgery_00000001_00000164	
2472	000165-000183		Pilliod, Alva - EastBayCtrforDermatologyCosmeticandLaserSurgery_00000165_00000183	
2473	000001-000001		Pilliod, Alva - EdenMedCtrMedRecsDept_00000001_00000001	
2474	000002-000207		Pilliod, Alva - EdenMedCtrMedRecsDept_00000002_00000207	
2475	000001-000001		Pilliod, Alva - EdenMedCtrPathDept_00000001_00000001	
2476	000001-000001		Pilliod, Alva - EdenMedCtrPatientAccts_00000001_00000001	
2477	000001-000001		Pilliod, Alva - EdenMedCtrRadDept_00000001_00000001	
2478	000001-000078		Pilliod, Alva - GoldenGateUrology_00000001_00000078	

2479	000207-000416		Pilliod, Alva - InternalRevenueSvcRAIVSTeam_00000207_00000416	
2480	000001-000266		Pilliod, Alva - LinStanMDMedRecsDept_00000001_00000266	
2481	000001-000083		Pilliod, Alva - NeuroPsychAllianceInc_00000001_00000083	
2482	000084-000091		Pilliod, Alva - NeuroPsychAllianceInc_00000084_00000091	
2483	000001-000003		Pilliod, Alva - NorCalImagingPleasanton_00000001_00000003	
2484	000004-000005		Pilliod, Alva - NorCalImagingPleasanton_00000004_00000005	
2485	000006-000006		Pilliod, Alva - NorCalImagingPleasanton_00000006_00000006	
2486	000007-00007		Pilliod, Alva - NorCalImagingPleasanton_00000007_00000007	
2487	000008-000025		Pilliod, Alva - NorCalImagingPleasanton_00000008_00000025	
2488	000026-000026		Pilliod, Alva - NorCalImagingPleasanton_00000026_00000026	
2489	000001-000029		Pilliod, Alva - NorthernCaliforniaSpineInstitute_00000001_00000029	
2490	000001-000009		Pilliod, Alva - PacificCoastSleepDisordersCtr_00000001_00000009	
2491	000010-000011		Pilliod, Alva - PacificCoastSleepDisordersCtr_00000010_00000011	
2492	000012-000012		Pilliod, Alva - PacificCoastSleepDisordersCtr_00000012_00000012	

2493	000001-000001		Pilliod, Alva - QuestDiagnosticsPatientAccts_00000001_00000001	
2494	000002-000002		Pilliod, Alva - QuestDiagnosticsPatientAccts_00000002_00000002	
2495	000001-000006		Pilliod, Alva - RiteAidHeadquartersCorporationLegalDept_00000001_00000006	
2496	000001-000001		Pilliod, Alva - StanfordHospsAndClinicsRadDept_00000001_00000001	
2497	000002-000002		Pilliod, Alva - StanfordHospsAndClinicsRadDept_00000002_00000002	
2498	000001-000750		Pilliod, Alva - StanfordHospsAndClinicsReleaseofInformation_00000001_00000750	
2499	000751-001111		Pilliod, Alva - StanfordHospsAndClinicsReleaseofInformation_00000751_00001111	
2500	000274-000274		Pilliod, Alva - ValleyMedAssocsMedRecsDept_00000274_00000274	
2501	000190-000190		Pilliod, Alva - UCSFMedCtrMedRecsDept_00000190_00000190	
2502	000001-000001		Pilliod, Alva - UCSFMedCtrPathDept_00000001_00000001	
2503	000001-000001		Pilliod, Alva - UCSFMedCtrRadDept_00000001_00000001	
2504	000002-000002		Pilliod, Alva - UCSFMedCtrRadDept_00000002_00000002	
2505	000003-000003		Pilliod, Alva - UCSFMedCtrRadDept_00000003_00000003	

2506	000004-000005		Pilliod, Alva - UCSFMedCtrRadDept_00000004_00000005	
2507	000001-000750		Pilliod, Alva - ValleyCareHealthSystem_00000001_00000750	
2508	000751-000770		Pilliod, Alva - ValleyCareHealthSystem_00000751_00000770	
2509	000002-000008		Pilliod, Alva - ValleyCareMedCtrPathDept_00000002_00000008	
2510	000009-000009		Pilliod, Alva - ValleyCareMedCtrPathDept_00000009_00000009	
2511	000007-000008		Pilliod, Alva - ValleyCareMedCtrRadDept_00000007_00000008	
2512	000009-000009		Pilliod, Alva - ValleyCareMedCtrRadDept_00000009_00000009	
2513	000010-000010		Pilliod, Alva - ValleyCareMedCtrRadDept_00000010_00000010	
2514	000011-000011		Pilliod, Alva - ValleyCareMedCtrRadDept_00000011_00000011	
2515	000001-000372		Pilliod, Alva - ValleyCarePhysicianAssocsPleasanton_00000001_00000372	
2516	000033-000070		Pilliod, Alva - ValleyMedOncologyConsultants_00000033_00000070	
2517	000001-000001		Pilliod, Alva - WashingtonHospHealthcareSystemMedRecsDept_00000001_00000001	
2518	000001-000002		Pilliod, Alva - WashingtonHospHealthcareSystemPathDept_00000001_00000002	
2519	000001-000001		Pilliod, Alva - WashingtonHospHealthcareSy	

			stemPatientAccts_00000001_00000001	
2520	000002-000002		Pilliod, Alva - WashingtonHospHealthcareSystemPatientAccts_00000002_00000002	
2521	000001-000001		Pilliod, Alva - WashingtonHospHealthcareSystemRadDept_00000001_00000001	
2522	AP-18-000001-000014		alva	
2523	AP-19-000001-000005		alva 3	
2524	AP-20-000001-000015		alva_568	
2525	AP-21-000001-000011		Pilliod, Alva - AARP United Healthcare - Prescription Drug Claims	
2526	AP-22-000001-000010		Pilliod, Alva - United Healthcare AARP - Healthcare Provider Claims	
2527	AP-23-000001-000043		Pilliod, Alva - Medicare Claims	
2528	000001-000028		Pilliod, Alva - Defendant 81 NationalPersonnelRecsCtrMilitaryPersonnelRecs_00000001_00000028	
2529	000001-000001		Pilliod, Alva - Defendant 82 ValleyOrthopedicSpecialists_00000001_00000001	
2530	000002-000002		Pilliod, Alva - Defendant 83 EdenMedCtrRadDept_00000002_00000002	
2531	000004-000019		Pilliod, Alva - Defendant 84 EdenMedCtrRadDept_00000004_00000019	
2532	000001-000006		Pilliod, Alva - Defendant 85 StanfordHematoPathConsultants_00000001_00000006	
2533	000001-000549		Pilliod, Alva - Defendant 86 USCFEpilepsyClinic_00000001_00000549	

2534	000001-000029		Pilliod, Alva - Defendant 87 SanRamonEndoscopyCtr_00000001_00000029	
2535	000030-000030		Pilliod, Alva - Defendant 88 SanRamonEndoscopyCtr_00000030_00000030	
2536	000031-000148		Pilliod, Alva - Defendant 89 SanRamonEndoscopyCtr_00000031_00000148	
2537	000149-000149		Pilliod, Alva - Defendant 90 SanRamonEndoscopyCtr_00000149_00000149	
2538	AP-01-000001-000021		Pilliod, Alberta - Records from Dr. raja office	
2539	AP-07-000001-000099		Pilliod, Alberta - Dr. Rubenstein medical records	
2540	AP-03-000001-006418		Pilliod, Alberta - Stanford health	
2541	AP-02-000001-000006		Pilliod, Alberta - More medical records from stanford	
2542	AP-06-000001-000044		Pilliod, Alberta - Medical records from Dr. SChmidt office	
2543	AP-04-000001-000024		Pilliod, Alberta - Dr. raja Medical records contiuned	
2544	AP-05-000001-000052		Pilliod, Alberta - medical record from Raja	
2545	AP-08-000001-000040		Pilliod, Alberta - Stanford Healthcare medical records	
2546	AP-09-000001-000006		Pilliod, Alberta - James Rubenstein medical records	
2547	AP-09-000001-000002		Pilliod, Alberta - Medical recordsfrom Stanford Health	
2548	000001-000055		Pilliod, Alberta - Defendant 01 ValleyMedOncologyConsultants_00000001_00000055	
2549	000001-000002		Pilliod, Alberta - Defendant 02 SSARetirementandDisability_00000001_00000002	
2550	000001-000003		Pilliod, Alberta - Defendant 03 InternalRevenueSvcRAIVSTeam_00000001_00000003	

2551	000001-000002		Pilliod, Alberta - Defendant 04 StanfordHospsAndClinicsRadDept_00000001_00000002	
2552	000003-000003		Pilliod, Alberta - Defendant 05 StanfordHospsAndClinicsRadDept_00000003_00000003	
2553	000004-000006		Pilliod, Alberta - Defendant 06 StanfordHospsAndClinicsRadDept_00000004_00000006	
2554	000001-000750		Pilliod, Alberta - Defendant 07 EdenMedCtrMedRecsDept_00000001_00000750	
2555	000751-001500		Pilliod, Alberta - Defendant 08 EdenMedCtrMedRecsDept_00000751_00001500	
2556	001501-001539		Pilliod, Alberta - Defendant 09 EdenMedCtrMedRecsDept_00001501_00001539	
2557	000001-000001		Pilliod, Alberta - Defendant 10 EdenMedCtrRadDept_00000001_00000001	
2558	000002-000003		Pilliod, Alberta - Defendant 11 EdenMedCtrRadDept_00000002_00000003	
2559	000001-000002		Pilliod, Alberta - Defendant 12 EdenMedCtrPathDept_00000001_00000002	
2560	000001-000044		Pilliod, Alberta - Defendant 13 EdenMedCtrPatientAccts_00000001_00000044	
2561	000001-000127		Pilliod, Alberta - Defendant 14 LivermoreValleyJointUnifiedSchoolDistrictHRs_00000001_00000127	
2562	000001-000001		Pilliod, Alberta - Defendant 15 MountainViewHealthcareCtrMedRecsDept_00000001_00000001	
2563	000751-001500		Pilliod, Alberta - Defendant 16 HealthInformationMgmtSvcsMedRecsDept_00000751_00001500	
2564	000001-000750		Pilliod, Alberta - Defendant 17 HealthInformationMgmtSvcsM	

			edRecsDept_00000001_00000750	
2565	000001-000027		Pilliod, Alberta - Defendant 18 VineyardHealthcare_00000001_00000027	
2566	000028-000592		Pilliod, Alberta - Defendant 19 VineyardHealthcare_00000028_00000592	
2567	001501-002250		Pilliod, Alberta - Defendant 20 HealthInformationMgmtSvcsMedRecsDept_00001501_00002250	
2568	002251-002972		Pilliod, Alberta - Defendant 21 HealthInformationMgmtSvcsMedRecsDept_00002251_00002972	
2569	002973-003071		Pilliod, Alberta - Defendant 22 HealthInformationMgmtSvcsMedRecsDept_00002973_00003071	
2570	000001-000014		Pilliod, Alberta - Defendant 23 WalgreenCompany_00000001_00000014	
2571	AP-10-000001-000017		Pilliod, Alberta - Schmit Billing Records	
2572	AP-11-000001-000011		Pilliod, Alberta - Dr. Raja Billing records	
2573	AP-12-000001-000023		Pilliod, Alberta - Stanford Hospital and Clinics	
2574	AP-16-000001-000320		Pilliod, Alberta - Valley Care Medical Associates	
2575	AP-13-000001-000025		Pilliod, Alberta - Stanford Path reports	
2576	AP-19-000001-000028		Pilliod, Alberta - Wal Mart Stores Main	
2577	AP-18-000001-000016		Pilliod, Alberta - Walgreens Medical Records	
2578	AP-14-000001-000022		Pilliod, Alberta - Documents from client	
2579	AP-15-000001-000035		Pilliod, Alberta - Medicare Supplement EOBs - AARP United Healthcare	

2580	AP-16-000001-000174		Pilliod, Alberta - Prescription EOBs - AARP United Healthcare	
2581	AP-20-000001-000004		Pilliod, Alberta - Webster Orthopedics	
2582	001540-001541		Pilliod, Alberta - EdenMedCtrMedRecsDept_00001540_00001541	
2583	000004-000004		Pilliod, Alberta - EdenMedCtrRadDept_00000004_00000004	
2584	000001-000047		Pilliod, Alberta - SchmidtBerndWMD_00000001_00000047	
2585	000048-000048		Pilliod, Alberta - SchmidtBerndWMD_00000048_00000048	
2586	000049-000065		Pilliod, Alberta - SchmidtBerndWMD_00000049_00000065	
2587	000001-000003		Pilliod, Alberta - SSADetailedEarnings_00000001_00000003	
2588	000007-000008		Pilliod, Alberta - StanfordHospsAndClinicsRadDept_00000007_00000008	
2589	000009-000009		Pilliod, Alberta - StanfordHospsAndClinicsRadDept_00000009_00000009	
2590	000001-000166		Pilliod, Alberta - StanfordHospsAndClinicsROIPatientAccts_00000001_00000166	
2591	000167-000337		Pilliod, Alberta - StanfordHospsAndClinicsROIPatientAccts_00000167_00000337	
2592	000001-000001		Pilliod, Alberta - UCSFMedCtrPathDept_00000001_00000001	
2593	000001-000100		Pilliod, Alberta - UCSFMedCtrPatientFinancialSvcs_00000001_00000100	

2594	000001-000002		Pilliod, Alberta - UCSFMedCtrRadDept_00000001_00000002	
2595	000001-000739		Pilliod, Alberta - ValleyCareHealthSystem_00000001_00000739	
2596	000001-000050		Pilliod, Alberta - ValleyCarePhysicianAssocsLivermore_00000001_00000050	
2597	000051-000259		Pilliod, Alberta - ValleyCarePhysicianAssocsLivermore_00000051_00000259	
2598	AP-21-000001-000011		Pilliod, Alberta - AARP United Healthcare - Medical Provider Claims	
2599	AP-22-000001-000007		Pilliod, Alberta - AARP United Healthcare Prescription Claims	
2600	AP-23-000001-000053		Pilliod, Alberta - Medicare Claims	
2601	000001-000006		Pilliod, Alberta - Defendant 41 AccentCareSkilledHomeHealthcare_00000001_00000006	
2602	000001-000022		Pilliod, Alberta - Defendant 42 AdvancedCardiovascularInstitute_00000001_00000022	
2603	000001-000017		Pilliod, Alberta - Defendant 43 AukerToddMD_00000001_00000017	
2604	000018-000019		Pilliod, Alberta - Defendant 44 AukerToddMD_00000018_00000019	
2605	000005-000005		Pilliod, Alberta - Defendant 45 EdenMedCtrRadDept_00000005_00000005	
2606	000007-000416		Pilliod, Alberta - Defendant 46 AccentCareSkilledHomeHealthcare_00000007_00000416	
2607	000001-000026		Pilliod, Alberta - Defendant 47 EricksonSoniaEDPM_00000001_00000026	
2608	000027-000029		Pilliod, Alberta - Defendant 48 EricksonSoniaEDPM_00000027_00000029	

2609	000001-000002		Pilliod, Alberta - Defendant 49 CVSPharmacyIncPrivacyOffice _00000001_00000002	
2610			Pilliod, Alberta - Defendant 51 APilliod -VP A -Livermore-000260	
2611	IMG_1505-135831.jpg		Photographs	
2612	IMG_1505-135831.jpg		Photographs	
2613	IMG_1505-135853.jpg		Photographs	
2614	IMG_1505-135853.jpg		Photographs	
2615	IMG_1506-135844.jpg		Photographs	
2616	IMG_1506-135844.jpg		Photographs	
2617	IMG_1506-135855.jpg		Photographs	
2618	IMG_1506-135855.jpg		Photographs	
2619	IMG_1507-135842.jpg		Photographs	
2620	IMG_1507-135842.jpg		Photographs	
2621	IMG_1507-135854.jpg		Photographs	
2622	IMG_1507-135854.jpg		Photographs	
2623	IMG_1508-135846.jpg		Photographs	
2624	IMG_1508-135846.jpg		Photographs	
2625	IMG_1508-135856.jpg		Photographs	
2626	IMG_1508-135856.jpg		Photographs	
2627	IMG_1509-135841.jpg		Photographs	
2628	IMG_1509-135841.jpg		Photographs	

2629	IMG_1510-135833.jpg		Photographs	
2630	IMG_1510-135833.jpg		Photographs	
2631	IMG_1510-135858.jpg		Photographs	
2632	IMG_1510-135858.jpg		Photographs	
2633	IMG_1511-135832.jpg		Photographs	
2634	IMG_1511-135832.jpg		Photographs	
2635	IMG_1512-135845.jpg		Photographs	
2636	IMG_1512-135845.jpg		Photographs	
2637	IMG_1512-135859.jpg		Photographs	
2638	IMG_1512-135859.jpg		Photographs	
2639	IMG_1513-135843.jpg		Photographs	
2640	IMG_1513-135843.jpg		Photographs	
2641	IMG_1513-135860.jpg		Photographs	
2642	IMG_1513-135860.jpg		Photographs	
2643	IMG_1514-135836.jpg		Photographs	
2644	IMG_1514-135836.jpg		Photographs	
2645	IMG_1514-135861.jpg		Photographs	
2646	IMG_1514-135861.jpg		Photographs	
2647	IMG_1515-135837.jpg		Photographs	
2648	IMG_1515-135837.jpg		Photographs	
2649	IMG_1515-135847.jpg		Photographs	

2650	IMG_1515-135847.jpg		Photographs	
2651	IMG_1516-135840.jpg		Photographs	
2652	IMG_1516-135840.jpg		Photographs	
2653	IMG_1516-135848.jpg		Photographs	
2654	IMG_1516-135848.jpg		Photographs	
2655	IMG_1517-135834.jpg		Photographs	
2656	IMG_1517-135834.jpg		Photographs	
2657	IMG_1517-135849.jpg		Photographs	
2658	IMG_1517-135849.jpg		Photographs	
2659	IMG_1518-135835.jpg		Photographs	
2660	IMG_1518-135835.jpg		Photographs	
2661	IMG_1518-135850.jpg		Photographs	
2662	IMG_1518-135850.jpg		Photographs	
2663	IMG_1519-135838.jpg		Photographs	
2664	IMG_1519-135838.jpg		Photographs	
2665	IMG_1520-135839.jpg		Photographs	
2666	IMG_1520-135839.jpg		Photographs	
2667	IMG_1520-135851.jpg		Photographs	
2668	IMG_1520-135851.jpg		Photographs	
2669	IMG_20181219_144353522.jpg		Photographs	
2670	IMG_20181219_144353522.jpg		Photographs	

2671	IMG_20181219_144400321.jpg		Photographs	
2672	IMG_20181219_144400321.jpg		Photographs	
2673	IMG_20181219_144410475.jpg		Photographs	
2674	IMG_20181219_144410475.jpg		Photographs	
2675	IMG_20181219_144415505.jpg		Photographs	
2676	IMG_20181219_144415505.jpg		Photographs	
2677	IMG_20181219_144426655.jpg		Photographs	
2678	IMG_20181219_144426655.jpg		Photographs	
2679	IMG_20181219_144435496.jpg		Photographs	
2680	IMG_20181219_144435496.jpg		Photographs	
2681	IMG_20181219_144515604.jpg		Photographs	
2682	IMG_20181219_144515604.jpg		Photographs	
2683	IMG_20181219_144548888.jpg		Photographs	
2684	IMG_20181219_144548888.jpg		Photographs	
2685	IMG_20181219_144557010.jpg		Photographs	
2686	IMG_20181219_144557010.jpg		Photographs	
2687	IMG_20181219_144613201.jpg		Photographs	
2688	IMG_20181219_144613201.jpg		Photographs	
2689	IMG_20181219_144618675_HDR.jpg		Photographs	
2690	IMG_20181219_144618675_HDR.jpg		Photographs	
2691	IMG_20181219_144624153.jpg		Photographs	

2692	IMG_20181219_144624153.jpg		Photographs	
2693	IMG_20181219_144632161.jpg		Photographs	
2694	IMG_20181219_144632161.jpg		Photographs	
2695	IMG_20181219_144653559.jpg		Photographs	
2696	IMG_20181219_144653559.jpg		Photographs	
2697	IMG_20181219_144731400.jpg		Photographs	
2698	IMG_20181219_144731400.jpg		Photographs	
2699	IMG_20181219_144738135.jpg		Photographs	
2700	IMG_20181219_144738135.jpg		Photographs	
2701	IMG_20181219_144826185.jpg		Photographs	
2702	IMG_20181219_144826185.jpg		Photographs	
2703	IMG_20181219_144831270.jpg		Photographs	
2704	IMG_20181219_144831270.jpg		Photographs	
2705	IMG_20181219_144858660_BURST000_COVER_TOP.jpg		Photographs	
2706	IMG_20181219_144858660_BURST000_COVER_TOP.jpg		Photographs	
2707	IMG_20181219_144904968.jpg		Photographs	
2708	IMG_20181219_144904968.jpg		Photographs	
2709	IMG_20181219_144913269.jpg		Photographs	
2710	IMG_20181219_144913269.jpg		Photographs	
2711	IMG_20181219_144928800_BURST000_COVER_TOP.jpg		Photographs	

2712	IMG_20181219_144928800_BURST000_COVER_TOP.jpg		Photographs	
2713	IMG_20181219_144937432.jpg		Photographs	
2714	IMG_20181219_144937432.jpg		Photographs	
2715	IMG_20181219_144945875.jpg		Photographs	
2716	IMG_20181219_144945875.jpg		Photographs	
2717	IMG_20181219_144949635.jpg		Photographs	
2718	IMG_20181219_144949635.jpg		Photographs	
2719	IMG_20181219_145019924.jpg		Photographs	
2720	IMG_20181219_145019924.jpg		Photographs	
2721	IMG_20181219_145402181.jpg		Photographs	
2722	IMG_20181219_145402181.jpg		Photographs	
2723	IMG_20181219_145406830.jpg		Photographs	
2724	IMG_20181219_145406830.jpg		Photographs	
2725	IMG_20181219_145413499.jpg		Photographs	
2726	IMG_20181219_145413499.jpg		Photographs	
2727	IMG_20181219_145425224.jpg		Photographs	
2728	IMG_20181219_145425224.jpg		Photographs	
2729	IMG_20181219_155535221.jpg		Photographs	
2730	IMG_20181219_155535221.jpg		Photographs	
2731	IMG_20181219_155546518.jpg		Photographs	
2732	IMG_20181219_155546518.jpg		Photographs	

2733	IMG_20181219_155610049_HDR.jpg		Photographs	
2734	IMG_20181219_155610049_HDR.jpg		Photographs	
2735	IMG_20181219_155622405.jpg		Photographs	
2736	IMG_20181219_155622405.jpg		Photographs	
2737	IMG_20181219_155711061.jpg		Photographs	
2738	IMG_20181219_155711061.jpg		Photographs	
2739	photo 10-134462.jpg		Photographs	
2740	photo 10-134462.jpg		Photographs	
2741	photo 11-134464.jpg		Photographs	
2742	photo 11-134464.jpg		Photographs	
2743	Photo 1-134457.jpg		Photographs	
2744	Photo 1-134457.jpg		Photographs	
2745	photo 12-134454.jpg		Photographs	
2746	photo 12-134454.jpg		Photographs	
2747	photo 13-134456.jpg		Photographs	
2748	photo 13-134456.jpg		Photographs	
2749	Photo 2-134463.jpg		Photographs	
2750	Photo 2-134463.jpg		Photographs	
2751	photo 4-134455.jpg		Photographs	
2752	photo 4-134455.jpg		Photographs	
2753	photo 6-134459.jpg		Photographs	
2754	photo 6-134459.jpg		Photographs	
2755	Photo 7-134460.jpg		Photographs	
2756	Photo 7-134460.jpg		Photographs	
2757	photo 8-134461.jpg		Photographs	
2758	photo 8-134461.jpg		Photographs	
2759	photo 9-134466.jpg		Photographs	
2760	photo 9-134466.jpg		Photographs	

2761	pilliod - scanned pictures.pdf		Photographs	
2762	pilliod - scanned pictures.pdf		Photographs	
2763	Pilliod pictures-136665.pdf		Photographs	
2764	Pilliod pictures-136665.pdf		Photographs	
2765	Pilliod, Alberta.jpg		Photographs	
2766	Pilliod, Alberta.jpg		Photographs	
2767			Satellite image 69 Agate Court	
2768			Satellite image 6789 Stabulis Road	
2769			Satellite image Gabor property	
2770			Satellite image Hartvickson Property	
2771			Pilliod, Alberta Deposition Exhibit 2: Itinerary to Chicago and notes produced at the deposition	
2772			Pilliod, Alberta Deposition Exhibit 4: Copies of photographs, 24 pages	
2773			Pilliod, Alberta Deposition Exhibit 5: Copies of photographs, 11 pages	
2774			Pilliod, Alberta Deposition Exhibit 6: Copies of photographs, 11 pages	
2775			Pilliod, Alberta Deposition Exhibit 7: Copies of photographs, 29 pages	
2776			Pilliod, Alberta Deposition Exhibit 8: Copy of a photograph, 1 page	
2777			Pilliod, Alberta Deposition Exhibit 9: Handwritten note	
2778			Pilliod, Alberta Deposition Exhibit 10: Al Pilliod, Recent appointments Related to Back, Side Muscle, and Hernia	

2779			Pilliod, Alberta Deposition Exhibit 12: Yellow folder labeled Cancer History	
2780			Pilliod, Alberta Deposition Exhibit 13: Blue folder labeled After Effects of Cancer	
2781			Pilliod, Alberta Deposition Exhibit 14: Medical records for Alva Pilliod, 25 pages	
2782			Pilliod, Alberta Deposition Exhibit 15: Blue folder labeled Cancer Treatments Used and Dates	
2783			Pilliod, Alberta Deposition Exhibit 16: Handwritten note	
2784			Pilliod, Alberta Deposition Exhibit 17: Yellow folder labeled Pay from LVJUSD After Retirement, June 2004	
2785			Pilliod, Alberta Deposition Exhibit 18: Google Maps, 69 Agate Court	
2786			Pilliod, Alberta Deposition Exhibit 19: Google Maps, 6789 Stabulis Road	
2787			Pilliod, Alberta Deposition Exhibit 20: Gabor property photographs	
2788			Pilliod, Alberta Deposition Exhibit 21: Hartvickson property photographs	
2789			Pilliod, Alberta Deposition Exhibit 22: Stabulis property photographs	
2790			Pilliod, Alberta Deposition Exhibit 23: Blue binder, collection of documents	
2791	AP-01-000001-000034		Pilliod, Alva- Dr. Raj Medical records	
2792	AP-02-000001-000032		Pilliod, Alva- Dr. Kavitha P. Raj, MD Medical records	
2793	AP-06-000001-000259		Pilliod, Alva (med recs from Dr. Tsung Wong)	

2794	AP-03-000001-001450		Pilliod, Alva Pilliod, Alva Valleycare Health System	
2795	AP-05-000001-000121		Pilliod Alva Pilliod, Alva Stanford Hospital and Clinics	
2796	AP-04-000001-000623		Pilliod, Alva- Pilliod, Alva UCSF Epilepsy Center Medical Records	
2797	AP-07-000001-000016		Pilliod, Alva- Nor Cal Imaging Pleasntion Medical Records	
2798	000001-000013		Pilliod, Alva Defendant 01 SSARetirementandDisability_00000001_00000013	
2799	000001-000003		Pilliod, Alva Defendant 02 InternalRevenueSvcRAIVSTeam_00000001_00000003	
2800	000004-000206		Pilliod, Alva Defendant 03 InternalRevenueSvcRAIVSTeam_00000004_00000206	
2801	000001-000032		Pilliod, Alva Defendant 04 Pilliod, Alva ValleyMedOncologyConsultants_00000001_00000032	
2802	000001-000273		Pilliod, Alva Defendant 05 TriPilliod, Alva ValleyMedAssocsMedRecsDept_00000001_00000273	
2803	000001-000750		Pilliod, Alva Defendant 06 Pilliod, Alva ValleyCareMedCtrMedRecsDept_00000001_00000750	
2804	000751-0001395		Pilliod, Alva Defendant 07 Pilliod, Alva ValleyCareMedCtrMedRecsDept_00000751_00001395	
2805	000003-00004		Pilliod, Alva Defendant 08 Pilliod, Alva ValleyCareMedCtrRadDept_00000003_00000004	
2806	000001-000002		Pilliod, Alva Defendant 09 Pilliod, Alva ValleyCareMedCtrRadDept_00000001_00000002	
2807	001396-001396		Pilliod, Alva Defendant 10 Pilliod, Alva	

			ValleyCareMedCtrMedRecsDept_00001396_00001396	
2808	000005-000006		Pilliod, Alva Defendant 11 Pilliod, Alva ValleyCareMedCtrRadDept_00000005_00000006	
2809	000001-000001		Pilliod, Alva Defendant 12 Pilliod, Alva ValleyCareMedCtrPathDept_00000001_00000001	
2810	000001-000001		Pilliod, Alva Defendant 13 GoodyearTireAndRubberCompanyHRs_00000001_00000001	
2811	000001-000013		Pilliod, Alva Defendant 14 Pilliod, Alva StanfordHealthCarePatientAccts_00000001_00000013	
2812	000001-000100		Pilliod, Alva Defendant 15 Pilliod, Alva UCSFMedCtrMedRecsDept_00000001_00000100	
2813	000101-000189		Pilliod, Alva Defendant 16 Pilliod, Alva UCSFMedCtrMedRecsDept_00000101_00000189	
2814	000001-000046		Pilliod, Alva Defendant 17 Pilliod, Alva UCSFMedCtrPatientFinancialSvcs_00000001_00000046	
2815	000001-000001		Pilliod, Alva Defendant 18 DhanoaTeginderSMD_00000001_00000001	
2816	000001-000010		Pilliod, Alva Defendant 19 LinStanMDPatientAccts_00000001_00000010	
2817	000001-000001		Pilliod, Alva Defendant 20 Pilliod, Alva ValleySurgicalGroup_00000001_00000001	
2818	000001-000066		Pilliod, Alva Defendant 21 GoldenStateDermatology_00000001_00000066	

2819	000067-000139		Pilliod, Alva Defendant 22 GoldenStateDermatology_00000067_00000139	
2820	000001-000001		Pilliod, Alva Defendant 23 EspinasOscarEMD_00000001_00000001	
2821	000001-000012		Pilliod, Alva Defendant 24 LinDavidMDPhd_00000001_00000012	
2822	000001-000001		Pilliod, Alva Defendant 25 Pilliod, Alva WashingtonTownshipMedFoundationNewarkClinic_00000001_00000001	
2823	AP-10-000001-000097		Pilliod, Alva- Dr. Greenberg medical and billing records	
2824	AP-08-000001-000044		Pilliod, Alva- Dr. Wong Billing records	
2825	AP-13-000001-000005		Pilliod, Alva- Dr. Raj Billing Records	
2826	AP-15-000001-000096		Pilliod, Alva (med recs from Pilliod, Alva Stanford Health)-	
2827	AP-11-000001-000165		Pilliod Alva - Pilliod, Alva Stanford Hlth	
2828	AP-12-000001-000013		Pilliod Alva - Pilliod, Alva Stanford neuroscience	
2829	AP-09-00001-000449		Pilliod, Alva- Pilliod, Alva UCSF Epilepy Center Records	
2830	AP-24-00001-000043		Pilliod, Alva (Pilliod, Alva UCSF Epilepsy Center)	
2831	AP-16-00001-000016		Pilliod, Alva (med recs from Walgreens)	
2832	AP-17-00001-000002		Pilliod Alva Wal Mart Stores INC CA	
2833	AP-25-000001-000018		Pilliod, Alva (med recs from Pilliod, Alva NorCal Imaging)	
2834	AP-14-000001-000051		PIlliod, Alva - EOB and records from client	
2835	000001-000001		Pilliod, Alva AdvancedCardiovascularInstitute_00000001_00000001	

2836	000002-000004		Pilliod, Alva AdvancedCardiovascularInstitute_00000002_00000004	
2837	000001-000001		Pilliod, Alva ColumbusDistributingHRs_00000001_00000001	
2838	000001-000164		Pilliod, Alva EastBayCtrforDermatologyCosmeticandLaserSurgery_00000001_00000164	
2839	000165-000183		Pilliod, Alva EastBayCtrforDermatologyCosmeticandLaserSurgery_00000165_00000183	
2840	000001-000001		Pilliod, Alva EdenMedCtrMedRecsDept_00000001_00000001	
2841	000002-000207		Pilliod, Alva EdenMedCtrMedRecsDept_00000002_00000207	
2842	000001-000001		Pilliod, Alva EdenMedCtrPathDept_00000001_00000001	
2843	000001-000001		Pilliod, Alva EdenMedCtrPatientAccts_00000001_00000001	
2844	000001-000001		Pilliod, Alva EdenMedCtrRadDept_00000001_00000001	
2845	000001-000078		Pilliod, Alva GoldenGateUrology_00000001_00000078	
2846	000207-000416		Pilliod, Alva InternalRevenueSvcRAIVSTeam_00000207_00000416	
2847	000001-000266		Pilliod, Alva LinStanMDMedRecsDept_00000001_00000266	
2848	000001-000083		Pilliod, Alva NeuroPsychAllianceInc_00000001_00000083	
2849	000084-000091		Pilliod, Alva NeuroPsychAllianceInc_00000084_00000091	

2850	000001-000003		Pilliod, Alva NorCalImagingPleasanton_00000001_00000003	
2851	000004-000005		Pilliod, Alva NorCalImagingPleasanton_00000004_00000005	
2852	000006-000006		Pilliod, Alva NorCalImagingPleasanton_00000006_00000006	
2853	000007-00007		Pilliod, Alva NorCalImagingPleasanton_00000007_00000007	
2854	000008-000025		Pilliod, Alva NorCalImagingPleasanton_00000008_00000025	
2855	000026-000026		Pilliod, Alva NorCalImagingPleasanton_00000026_00000026	
2856	000001-000029		Pilliod, Alva NorthernCaliforniaSpineInstitute_00000001_00000029	
2857	000001-000009		Pilliod, Alva PacificCoastSleepDisordersCtr_00000001_00000009	
2858	000010-000011		Pilliod, Alva PacificCoastSleepDisordersCtr_00000010_00000011	
2859	000012-000012		Pilliod, Alva PacificCoastSleepDisordersCtr_00000012_00000012	
2860	000001-000001		Pilliod, Alva QuestDiagnosticsPatientAccts_00000001_00000001	
2861	000002-000002		Pilliod, Alva QuestDiagnosticsPatientAccts_00000002_00000002	
2862	000001-000006		Pilliod, Alva RiteAidHeadquartersCorporationLegalDept_00000001_00000006	
2863	000001-000001		Pilliod, Alva StanfordHospsAndClinicsRadDept_00000001_00000001	

2864	000002-000002		Pilliod, Alva StanfordHospsAndClinicsRadDept_00000002_00000002	
2865	000001-000750		Pilliod, Alva StanfordHospsAndClinicsReleaseofInformation_00000001_00000750	
2866	000751-001111		Pilliod, Alva StanfordHospsAndClinicsReleaseofInformation_00000751_00001111	
2867	000274-000274		Pilliod, Alva ValleyMedAssocsMedRecsDept_00000274_00000274	
2868	000190-000190		Pilliod, Alva UCSFMedCtrMedRecsDept_00000190_00000190	
2869	000001-000001		Pilliod, Alva UCSFMedCtrPathDept_00000001_00000001	
2870	000001-000001		Pilliod, Alva UCSFMedCtrRadDept_00000001_00000001	
2871	000002-000002		Pilliod, Alva UCSFMedCtrRadDept_00000002_00000002	
2872	000003-000003		Pilliod, Alva UCSFMedCtrRadDept_00000003_00000003	
2873	000004-000005		Pilliod, Alva UCSFMedCtrRadDept_00000004_00000005	
2874	000001-000750		Pilliod, Alva ValleyCareHealthSystem_00000001_00000750	
2875	000751-000770		Pilliod, Alva ValleyCareHealthSystem_00000751_00000770	
2876	000002-000008		Pilliod, Alva ValleyCareMedCtrPathDept_00000002_00000008	
2877	000009-000009		Pilliod, Alva ValleyCareMedCtrPathDept_00000009_00000009	

2878	000007-000008		Pilliod, Alva ValleyCareMedCtrRadDept_00000007_00000008	
2879	000009-000009		Pilliod, Alva ValleyCareMedCtrRadDept_00000009_00000009	
2880	000010-000010		Pilliod, Alva ValleyCareMedCtrRadDept_00000010_00000010	
2881	000011-000011		Pilliod, Alva ValleyCareMedCtrRadDept_00000011_00000011	
2882	000001-000372		Pilliod, Alva ValleyCarePhysicianAssocsPleasanton_00000001_00000372	
2883	000033-000070		Pilliod, Alva ValleyMedOncologyConsultants_00000033_00000070	
2884	000001-000001		Pilliod, Alva WashingtonHospHealthcareSystemMedRecsDept_00000001_00000001	
2885	000001-000002		Pilliod, Alva WashingtonHospHealthcareSystemPathDept_00000001_00000002	
2886	000001-000001		Pilliod, Alva WashingtonHospHealthcareSystemPatientAccts_00000001_00000001	
2887	000002-000002		Pilliod, Alva WashingtonHospHealthcareSystemPatientAccts_00000002_00000002	
2888	000001-000001		Pilliod, Alva WashingtonHospHealthcareSystemRadDept_00000001_00000001	
2889	AP-18-000001-000014		alva	
2890	AP-19-000001-000005		alva 3	
2891	AP-20-000001-000015		alva_568	

2892	AP-21-000001-000011		Pilliod, Alva - AARP United Healthcare - Prescription Drug Claims	
2893	AP-22-000001-000010		Pilliod, Alva - United Healthcare AARP - Healthcare Provider Claims	
2894	AP-23-000001-000043		Pilliod, Alva - Medicare Claims	
2895	000001-000028		Pilliod, Alva Defendant tab 81 NationalPersonnelRecsCtrMilitaryPersonnelRecs_00000001_00000028	
2896	000001-000001		Pilliod, Alva Defendant tab 82 TriPilliod, Alva ValleyOrthopedicSpecialists_00000001_00000001	
2897	000002-000002		Pilliod, Alva Defendant Tab 83 Pilliod, Alva EdenMedCtrRadDept_00000002_00000002	
2898	000004-000019		Pilliod, Alva Defendant Tab 84 Pilliod, Alva EdenMedCtrRadDept_00000004_00000019	
2899	000001-000006		Pilliod, Alva Defendant tab 85 Pilliod, Alva StanfordHematoPathConsultants_00000001_00000006	
2900	000001-000549		Pilliod, Alva Defendant tab 86 USCFEpilepsyClinic_00000001_00000549	
2901	000001-000029		Pilliod, Alva Defendant tab 87 SanRamonEndoscopyCtr_00000001_00000029	
2902	000030-000030		Pilliod, Alva Defendant 88 SanRamonEndoscopyCtr_00000030_00000030	
2903	000031-000148		Pilliod, Alva Defendant 89 SanRamonEndoscopyCtr_00000031_00000148	
2904	000149-000149		Pilliod, Alva Defendant 90 SanRamonEndoscopyCtr_00000149_00000149	

2905			Pilliod, Alberta Deposition Exhibit 26: Proposition 65, Glyphosate Fact Sheet	
2906			Pilliod, Jr., Alva Lee CVS/Pharmacy, Inc. Pharmacy 2/25/2019 1-3 3	
2907			Pilliod, Jr., Alva Lee Eden Medical Center Compact Disk 1/29/2019 3-3 1	
2908			Pilliod, Jr., Alva Lee John Muir Medical Group Copied NR Cert or Letter 2/11/2019 1-1 1 Pilliod, Jr., Alva Lee Neuro-Psych Alliance, Inc. Billing 2/22/2019 92-92 1	
2909			Pilliod, Jr., Alva Lee San Ramon Regional Medical Center Medical 2/22/2019 1-29 29	
2910			Pilliod, Jr., Alva Lee San Ramon Regional Medical Center Film Inventory 2/20/2019 1-1 1	
2911			Pilliod, Jr., Alva Lee Stanford Hospitals & Clinics Original Certification 1/21/2019 3-3 1	
2912			Pilliod, Jr., Alva Lee Stanford Hospitals & Clinics Compact Disk 1/28/2019 4-4 1	
2913			Pilliod, Jr., Alva Lee Stanford Hospitals & Clinics Pathology Reports 2/19/2019 1-6 6	
2914			Pilliod, Jr., Alva Lee Tri-Valley Orthopedic Specialists Copied NR Cert or Letter 2/8/2019	
2915			Positive prints of Alberta Pilliod MRI, CT, Pet Scans	
2916			Postive prints of Alva Pilliod MRI, CT, Pet Scans	
2917	Medical Imaging C.D.		1/17/2019 XR Foot, 1/15/2019 XR Chest, 12/25/2018 XR Foot, 12/25/2018 XR Ankle, 12/25/218 XR Knee, 12/12/2017 XR Pelvis, 12/12/2017, XR Lumbar spine, 5/10/17 Mammo	

2918	Medical Imaging C.D.		5/15/2015 – Chest	
2919	Medical Imaging C.D.		9/27/2015 – MR Brain	
2920	Medical Imaging C.D.		11/29/2015 – MR Brain	
2921	Medical Imaging C.D.		4/10/2016 – MR Brain	
2922	Medical Imaging C.D.		7/31/2016 – MR Brain	
2923	Medical Imaging C.D.		5/14/2015 – MR Brain, 5/7/2015 Chest, 5/1/2015 Chest, 4/22/2015 Chest, 4/17/2015 CT Head, 4/8/2015 Chest	
2924	Medical Imaging C.D.		4/10/2016 MR Brain	
2925	Medical Imaging C.D.		4/10/2016 MR Brain	
2926	Medical Imaging C.D.		1/12/2016 US Breast, 1/5/2016 XR Hand, 1/5/2016 XR Wrist	
2927	Medical Imaging C.D.		7/31/2016 MR Brain	
2928	Medical Imaging C.D.		7/31/2016 MR Brain, 4/10/2016 MR Brain	
2929	Medical Imaging C.D.		4/10/2016 MR Brain, 1/31/2016 MR Brain	
2930	Medical Imaging C.D.		1/31/2016 MR Brain	
2931	Medical Imaging C.D.		1/31/2016 MR Brain, 11/29/2015 MR Brain	
2932	Medical Imaging C.D.		11/29/2015 MR Brain, 9/27/2015 MR Brain	
2933	Medical Imaging C.D.		9/27/2015 MR Brai, 7/5/2015 MR Brain	
2934	Medical Imaging C.D.		7/5/2015 MR Brain	
2935	Medical Imaging C.D.		7/5/2015 MR Brain, 5/15/2015 DX Chest, 5/14/2015 MR Brain	
2936	Medical Imaging C.D.		45/14/2015 MR Brain, 5/7/2015 DX Chest, 5/1/2015 Chest, 5/1/2015 DX Chest,	

			4/22/2015 DX Chest, 4/8/2015 MR Stereotactic	
2937	Medical Imaging C.D.		4/6/2015 MR Brain	
2938	Medical Imaging C.D.		4/6/2015 MR Brain, 3/12/2015 MR/OT Diagnosis Stroke Protocol	
2939	Medical Imaging C.D.		3/12/2015 MR Diagnosis Stroke Protocol	
2940	Medical Imaging C.D.		3/12/2015 MR Diagnosis Stroke Protocol	
2941	Medical Imaging C.D.		3/12/2015 MR Diagnosis Stroke Protocol	
2942	Medical Imaging C.D.		3/13/2015 CT Chest ABD Pelvis with Con	
2943	Medical Imaging C.D.		3/13/2015 CT Chest ABD Pelvis with Con	
2944	Medical Imaging C.D.		3/13/2015 CT Chest ABD Pelvis with Con	
2945	Medical Imaging C.D.		4/7/2015 CT/PT FDG PET CT	
2946	Medical Imaging C.D.		4/7/2015 CT/PT FDG PET CT	
2947	Medical Imaging C.D.		4/7/2015 CT/PT FDG PET CT	
2948	Medical Imaging C.D.		4/17/2015 CT Head, 4/7/2015 CT/PT FDG PET	
2949	Medical Imaging C.D.		4/7/2015 CT/PT – FDG PET CT, 3/13/2015 CT Chest	
2950	Medical Imaging C.D.		3/13/2015 CT Chest	
2951	Medical Imaging C.D.		3/13/2015 CT Chest, 3/13/2015 CT Head	
2952	Medical Imaging C.D.		3/13/2015 CT Head, 3/12/2015 CT Head	
2953	Medical Imaging C.D.		5/14/2015 MR/OT Brain, 4/08/2015 MR Sterotactic on Call	
2954	Medical Imaging C.D.		4/6/2015 MR Brain	
2955	Medical Imaging C.D.		4/6/2015 MR Brain	

2956	Medical Imaging C.D.		4/8/2015 MR Stereotactic, 4/6/2015 MR Brain	
2957	Medical Imaging C.D.		5/15/2015 DX Chest, 5/7/2015 DX Chest, 5/1/2015 DX Chest, 5/1/2015 Chest, 4/22/2015 DX Chest, 4/8/2015 DX Chest	
2958	Medical Imaging C.D.		4/8/2015 MR Stereotactic, 4/8/215 DX Chest, 4/5/2015 MR Brain	
2959	Medical Imaging C.D.		6/20/2011 PET CT	
2960	Medical Imaging C.D.		11/9/11 PET CT; 8/26/11 PET CT	
2961	Medical Imaging C.D.		7/3/2013 PET CT; 12/10/2012 PET CT	
2962	Medical Imaging C.D.		7/5/2012 CT Neck W WO	
2963	Medical Imaging C.D.		7/5/2012 CT ABD Pelvis Chest W WO	
2964	Medical Imaging C.D.		5/12/2011 MR Lumbar Spine WO	
2965	Medical Imaging C.D.		NorCal Imaging Pleasanton - 6/20/2011 PET/CT WB	
2966	Medical Imaging C.D.		Valleycare Health System - 2/13/2011 Lspine	
2967	Medical Imaging C.D.		Valleycare Health System - 5/9/2011 Hip Right & Pelvis	
2968	Medical Imaging C.D.		NorCal Imaging Pleasanton - 6/20/211 PET/CT Legs	
2969	MONGLY10528554	MONGLY009401670	Roundup® commercial	
2970	MONGLY11770840		Roundup® commercial	
2971	MONGLY11770864		Roundup® commercial	
2972	https://www.youtube.com/watch?v=XHpzMZLOzCU		Roundup® commercial (RoundUp : Weed Killer "Nothing kills weeds better or easier than Roundup." LawnCare TV Commercial) Published 2-16-19	2/16/2019
2973	https://www.youtube.com/watch?v=dsryakfXC0U		Roundup® commercial (1990 Roundup Weed Killer commercial) Published 1-15-19	1990

2974	https://www.youtube.com/watch?v=99l_C9BfVeY		Roundup® commercial (1991 Roundup Commercial) Published 8-2-14	1991
2975	https://www.youtube.com/watch?v=EnxnYIAPa10		Roundup® commercial (Ready to Use | Video | Roundup Weedkiller) Published 7-3-19	7/3/2009
2976	https://www.youtube.com/watch?v=Yp1TdXj6-54		Roundup® commercial (1994 Round Up Weed killer "Judges" TV Commercial) Published 10-24-2017	2017
2977	https://www.youtube.com/watch?v=acJ-x4wKnsI		Roundup® commercial (1989 Round Up Weed Killer TV Commercial) Published 1-11-19	1989
2978	https://www.youtube.com/watch?v=fNycZHr3AnM		Roundup® commercial (Roundup Pump 'N Go) Published 6-2-18	6/2/2008
2979	https://www.atsdr.cdc.gov/news/displaynews.asp?PRid=1991		ATSDR Press Release re: Livermore Nuclear Laboratory	4/23/2004
2980			Roundup Weed & Grass Killer Ready to Use Plus Label,	
2981			Roundup® Weed & Grass Killer Super Concentrate Label,	
2982			Roundup® Weed & Grass Killer Concentrate Label,	
2983			Roundup® Original Label	
2984			Leon, et al, Pesticide use and risk of non-Hodgkin lymphoid malignancies in agricultural cohorts from France, Norway and the USA: a pooled analysis from the AGRICOH consortium, International Journal of Epidemiology, , dyz017, https://doi.org/10.1093/ije/dyz017	
2985			Greenland, et al., Scientists rise up against statistical significance, Nature, 3/20/2019	

			https://www.nature.com/articles/d41586-019-00857-9	
2986			O'Shanick Dep. Ex. 1 Letter to Mr. Esfandiary, Esq. From The Center for Neurorehabilitation Services, dated November 28, 2018	
2987			O'Shanick Dep. Ex. 2 Document containing Legal Testimony by year	
2988			O'Shanick Dep. Ex. 3 Statement dated 3/5/2019	
2989			O'Shanick Dep. Ex. 4 Statement dated 3/5/2019	
2990			O'Shanick Dep. Ex. 5 Document headed "Alva Pilliod Notes"	
2991			O'Shanick Dep. Ex. 6 Center for Neurorehabilitation Services file for Alva Pilliod	
2992			O'Shanick Dep. Ex. 7 Center for Neurorehabilitation Services Alberta Pilliod	
2993			O'Shanick Dep. Ex. 8 Curriculum Vitae for Gregory John O'Shanick	
2994			O'Shanick Dep. Ex. 9 Document entitled "Pilliod v. Monsanto, Dr. O'Shanick's Reliance List - March 4, 2019"	
2995			O'Shanick Dep. Ex. 10 Plaintiffs' Designation of Expert Witnesses	
2996			O'Shanick Dep. Ex. 11 Plaintiffs' First Amended Designation of Expert Witnesses	
2997			O'Shanick Dep. Ex. 12 Document headed "Alberta Pilliod, DOB: 04.17.1944, Roundup: 1982/3-13 2016 (2x/wk)1975-2011?"	
2998			O'Shanick Dep. Ex. 13 Chemotherapy Consent Form,	

			Bates Confidential-Pilliod-APilliodJr- SLin-MD-000177 to 000178 74	
2999			O'Shanick Dep. Ex. 14 Progress Notes, Bates Confidential-Pilliod-APilliodJr-19 SLin-MD-000059	
3000			O'Shanick Dep. Ex. 15 Handwritten notes dated 10/20/2011, Bates Confidential-Pilliod- APilliodJr-SLin-MD-000056	
3001			O'Shanick Dep. Ex. 16 Letter to Dr. Willkom from Dr. Lin, Bates Confidential-Pilliod- APilliodJr-SLin-MD-000094	
3002			O'Shanick Dep. Ex. 17 Consultation Report, Bates Pilliod-APilliodJr-PPR000914 to 000916	
3003			O'Shanick Dep. Ex. 18 Letter to Dr. Kuruma from Dr. Lin,dated 9/25/2008, Bates Confidential-Pilliod-APilliodJr-SLin-MD-000092 to 000093	
3004			O'Shanick Dep. Ex. 19 Documents from UCSF Medical Center re Al Pilliod, Bates Confidential- Pilliod-APilliodJr-UCSFMC-MD-00111 to 00114	
3005			O'Shanick Dep. Ex. 20 Initial Neuropsychological Evaluation records for Alva Pilliod, Bates Confidential-Pilliod-APilliod Jr-Tri-ValMA-00238 to 00249	
3006			O'Shanick Dep. Ex. 21 Handwritten notes, dated 4/5/2012,Bates Confidential-Pilliod- APilliodJr-SLin-MD-000054 112	
3007			O'Shanick Dep. Ex. 22 Handwritten notes, Bates	

			Confidential-Pilliod-APilliodJr-SLin-MD-000050	
3008			O'Shanick Dep. Ex. 23 Consultation Report from ValleyCare Health System, Bates Pilliod-APilliodJr-VCMC-MD-001289 TO 001291	
3009			O'Shanick Dep. Ex. 24 Discharge Summaries - Encounter Notes, Bates Confidential-Pilliod- APilliodJr-StanH&C-MD-000799 to 000809	
3010			O'Shanick Dep. Ex. 25 ED Records for Alberta Pilliod, Bates Confidential-Pilliod-APilliod-HIMS-01538 to 01559	
3011			O'Shanick Dep. Ex. 26 Brief Report from The ClinicalNeuropsychologist entitled "Dichotic Listening Performances of Patients with Chronic Exposure to Organic Solvents"	
3012			O'Shanick Dep. Ex. 27 Article from the Journal of the American Society for Experimental NeuroTherapeutics entitled "The Blood-Brain Barrier: Bottleneck in Brain Drug Development"	
3013			O'Shanick Dep. Ex. 28 Consultation Report from ValleyCare Medical Center for Alva Pilliod	
3014			O'Shanick Dep. Ex. 29 Initial Neuropsychological Evaluation, Bates AP-06-000231 to 000237	
3015			O'Shanick Dep. Ex. 30 National Comprehensive Cancer Network, Chemotherapy Order Template	

3016			O'Shanick Dep. Ex. 31 Document entitled "Follow Up," Valley Medical Oncology Consultants, Bates AP-02-000002 to 000004	
3017			O'Shanick Dep. Ex. 32 Document entitled "Follow Up," Valley Medical Oncology Consultants, Bates AP-04-000009 to 000011 203	
3018			O'Shanick Dep. Ex. 33 Stanford Health Care Encounter record for Alberta Pilliod, Bates AP-08-000001 to 000040	
3019			O'Shanick Dep. Ex. 34 Stanford Health Care Encounter record for Alberta Pilliod, Bates AP-03-001111 and 001460 to 001468	
3020			O'Shanick Dep. Ex. 35 UCSF Medical Center record for Al Pilliod, Bates Confidential-Pilliod- APilliodJr-PPR-002454 to 002457	
3021			ValleyCarePhysicianAssocsPleasanton_0000000l _00000596-	
3022			ValleyCarePhysicianAssocsPleasanton_00000597 00000597-	
3023			ValleyMedOncologyConsultants 00000071 _00000114-	
3024			GoldenStateDermatology 00000140 00000145-	
3025			GoldenStateDermatology 00000146 00000146-	
3026			Pilliod - pictures from clients	
3027			Pilliod Albert Valleycare Health AP-24-000001 to AP-24-000540	
3028			Pilliod, Alva Stanford Neuroscience Heath Center AP-26-000001 to AP-26-002303	

3029			IARC Monographs on the Evaluation of Carcinogenic Risks to Humans VOLUME 112: SOME ORGANOPHOSPHATE INSECTICIDES AND HERBICIDES: DIAZINON, GLYPHOSATE, MALATHION, PARATHION, AND TETRACHLORVINPHOS Lyon, France: 3-10 March 2015	03/10/2015
3030			OEHHA: Frequently Asked Questions Proposition 65 and Glyphosate	
3031	MONGLY07903269	MONGLY07903271	Email from Murphey to Kelland re Blair deposition concealing IARC showed link between glyphosate and cancer	04/27/2017
3032	MONGLY08199064	MONGLY08199071	Email from Partridge to Grant re IARC/House oversight committee investigation	08/08/2017
3033			Thompson Reuters: Glyphosate Battle	02/03/2019
3034			Glyphosate listed Effective July 7, 2017 as Known to the state of California to Cause Cancer	06/26/2017
3035			Gabriella Andreotti, Jay H. Lubin, Stella Koutros, Jonathan N. Hofmann, Dale P. Sandler, Catherine C. Lerro, Christine G. Parks, Debra T. Silverman, Laura E. Beane Freeman. Response to Shepard and Shaffer. JNCI Natl Cancer Inst (2019) 111(2) 1-3	12/28/2018
3036			Revised Glyphosate Issue Paper: Evaluation of Carcinogenic Potential EPA's Office of Pesticide Programs, December 12, 2017	12/12/2017

3037			Gabreilla Andreotti, Jay H. Lubin, Stella Koutros, Jonathan N. Hoffmann, Dale P. Sandler, Catherine C. Lerro, Christine G. Parks, Debra T. Silverman, Laura E. Beanne Freeman. Response to Sheppard and Shaffer. JNCI Natl Cancer Inst (2019) 111(2): djy201	12/28/2018
3038			Mark A. Martens CV	
3039			Trial Demonstrative - Pain and Suffering Chart	
3040			Kate Kelland. Special Report: Cancer agency left in the dark over glyphosate evidence	6/14/2017
3041			Plaintiffs' Amended Notice to Take the Videotaped Oral Deposition of Defendant Monsanto Company	1/16/2019
3042			LinkedIn page - Samuel Murphey	1/16/2019
3043			IARC Monographs n the Evaluation of Carcinogenic Risks of Humans	11/9/2018
3044			Nabhan Deposition Exhibit 20	1/9/2019
3045			Nabhan Curriculumn Vitae	4/1/2019
3046			OShanick Curriculumn Vitae	1/8/2019
3047			Pilliod - Exposure Chart	
3048			Weisenburger Deposition Exhibt 18	
3049			Weisenburger Deposition Exhibit 20	
3050			Weisenburger CV	8/1/2018

3051			All documents and literature used to impeach the testimony of Defendant's witnesses	
3052			All documents and literature used in redirect examination of Plaintiffs' witnesses	
3053			Causation Pillars from Reeves Deposition	
3054			List of Documents Reviewed by Hugh Grant	
3055			Dr. Ritz Curriculumn Vitae	
3056			Michael C. R. Alavanja, Dale P. Sandler, Cheryl J. McDonnell, Charles F. Lynch, Margaret Pennybacker, Shelia Hoar Zahm, David T. Mage, William C. Steen, Wendy Wintersteen, and Aaron Blair. Characterists of Pesticide use in a Pesticide Applicator Cohort: The Agriculutural Health Study. Environmental Research Section A 80, 172-179 (1999)	
3057			Kativtha P. Raj Deposition Transcript Excerpts	01/08/2019
3058			James Rubenstein Deposition Transcript Excerpts	02/07/2019
3059			Neel Gupta Deposition Transcript Excerpts	01/23/2019
3060			Donald E. Born Deposition Transcript Excerpts	01/29/2019
3061			US Department of Health and Human Services, Agency for Toxic Substances and Disease Registry. Toxicological Profile for Glyphosate, Draft for Public Comment. March 2019.	03/01/2019

3062			Lindsay M. Morton, Susan L. Slager, James R. Cerhan, Sophia S. Wang, Claire M. Vajdic, Christine F. Skibola, Paige M. Bracci, Silvia de Sanjosé, Karin E. Smedby, Brian C. H. Chiu, Yawei Zhang, Sam M. Mbulaiteye, Alain Monnereau, Jennifer J. Turner, Jacqueline Clavel, Hans-Olov Adami, Ellen T. Chang, Bengt Glimelius, Henrik Hjalgrim, Mads Melbye, Paolo Crosignani, Simonetta di Lollo, Lucia Miligi, Oriana Nanni, Valerio Ramazzotti, Stefania Rodella, Adele Seniori Costantini, Emanuele Stagnaro, Rosario Tumino, Carla Vindigni, Paolo Vineis, Nikolaus Becker, Yolanda Benavente, Paolo Boffetta, Paul Brennan, Pierluigi Cocco, Lenka Foretova, Marc Maynadié, Alexandra Nieters, Anthony Staines, Joanne S. Colt, Wendy Cozen, Scott Davis, Anneclaire J. de Roos, Patricia Hartge, Nathaniel Rothman, Richard K. Severson, Elizabeth A. Holly, Timothy G. Call, Andrew L. Feldman, Thomas M. Habermann, Mark Liebow, Aaron Blair, Kenneth P. Cantor, Eleanor V. Kane, Tracy Lightfoot, Eve Roman, Alex Smith, Angela Brooks-Wilson, Joseph M. Connors, Randy D. Gascoyne, John J. Spinelli, Bruce K. Armstrong, Anne Kricker, Theodore R. Holford, Qing Lan, Tongzhang Zheng, Laurent Orsi, Luigino Dal Maso, Silvia Franceschi,	

			Carlo La Vecchia, Eva Negri, Diego Serraino, Leslie Bernstein, Alexandra Levine, Jonathan W. Friedberg, Jennifer L. Kelly, Sonja I. Berndt, Brenda M. Birmann, Christina A. Clarke, Christopher R. Flowers, James M. Foran, Marshall E. Kadin, Ora Paltiel, Dennis D. Weisenburger, Martha S. Linet, Joshua N. Sampson. Etiologic Heterogeneity Among Non-Hodgkin Lymphoma Subtypes: The InterLymph Non-Hodgkin Lymphoma Subtypes Project. Journal of the National Cancer Institute Monographs, 48:130–144. 2014.	
3063			Pathology Report by Dr. David Lin at San Ramon Endoscopy Center (Alva Pilliod)	09/09/2010
3064			Eli Zuckerman, Tsila Zuckerman, Dvora Sahar, Sara Streichman, Dina Attias, Edmond Sabo, Daniel Yeshurun, and Jacob M. Rowe. The effect of antiviral therapy on t(14:18) translocation and immunoglobulin gene rearrangement in patients with chronic hepatitis C virus infection. (Blood. 2001; 97:1555-1559)	
3065			Francesca Giannelli, Stefania Moscarella, Carlo Giannini, Patrizio Caini, Monica Monti, Laura Gragnani, Roberto Giulio Romanelli, Vera Solazzo, Giacomo Laffi, Giorgio La Villa, Paolo Gentilini, and Anna Linda Zignego. Effect of antiviral treatment in patients	

			with chronic HCV infection and t(14;18) translocation. (Blood. 2003; 102:1196-1201)	
3066			Venerando Rapisarda, Caterina Ledda, Serena Matera, Lucrezia Fago, Giorgio Arrabito, Luca Falzone, Andrea Marconi, Massimo Libra And Carla Loreto. Absence of t(14;18) chromosome translocation in agricultural workers after short-term exposure to pesticides. Molecular Medicine Reports 15: 3379-3382, 2017.	02/07/2017
3067			OEHHA Notice of Proposed rulemaking: Amendmnet to Section 25705, Sepcific Regulatory Levels No Significant Risk: Glyphosate	03/28/2017
3068			Reeves Deposition Exhibit 99 – Business Record prepared based on facts researched and developed concerning IARC and regulatory evaluations of what IARC had done	
3069			Reeves Deposition Exhibt 73 – List of US Regulators, EPA, ATSDR, OSHA, and OEHHA	
3070			Key Statistics for Non0Hodgkin Lypmphoma. American Cancer Society. https://www.cancer.org/cancer/non-hodgkin-lymphoma/about/key-statistics.html	1/8/2019
3071			Michael Koch Curriculumn Vitae. Koch Deposition Exhibit No. 2	5/19/2016
3072			California Code of Regulations Section 25701	

3073			Days of exposure per year over the period of the Pilliod's exposure	
3074			Robin Mesnage, Charles Benbrook, and Michael N. Antoniou. Insight into the confusion over surfactant co-formulants in glyphosate-based herbicides. Food and Chemical Toxicology. Volume 128, June 2019, Pages 137-145. (https://doi.org/10.1016/j.fct.2019.03.053)	2019
3075			Monkey Chairs	
3076			Roundup Weed & Grass Killer Ready-To-Use Bottle Photo	
3077			Predictive Operator Exposure Model	
3078			Roundup Advertisement	
3079			Epidermal Layers of Human Skin	
3080			Surfactant Toxicology	
3081			Roundup Advertisement Screenshot	
3082			Roundup Super Concentrate Bottle Photo	
3083			History of Glyphosate Study Results (1983-2017)	
3084			William R. Sawyer Curriculumn Vitae	
3085			ACFEI Executive Advisory Board. The Forensic Examiner.	
3086			Dr. Pease Curriculumn Vitae	
3087			California Code of Regulations Section 25904	
3088			Original Inustrial Bio-Test Laboratories, Inc. (IBT) Report to Monsanto Company 18-Month Carcinogenic Study with CP67573 in Swiss Mice	09/19/1973

3089			Environmental Protection Agency, September 13, 1974 Study on Glyphosate technical CP 67573, Glyphosate Water-based formulation 70139 Mon 2139	09/13/1974
3090			OEHHA Proposition 65 Warnings about Glyphosate March 2018	03/01/2018
3091			Charles Benbrook Curriculumn Vitae	04/16/2019
3092			Response to Genotoxicity Research Recommendations Transmitted to Monsanto by Dr. James Perry on Glyphosate Technical and Formulated Glyphosate Herbicides	03/06/2019
3093			Glyphosate usage chart	
3094			Roundup 2015-10-15 Super Concentrate Safety Data Source with IARC Statement	10/15/2015
3095			Various Medical Pages specific to Alberta Pilliod (Discharge Summaries, Encounter Notes, Neurology Reports, Doctors Notes, Pathology Reports, etc.)	Various Dates
3096			Dr. Robert Phalen Expert Report	1/25/2019
3097			James A. Mills Curriculumn Vitae	1/1/2018
3098			James A. Mills Economic Impact Expert Report	1/9/2019
3099			Bryan A. Bassig, Qing, Lan, Nathaniel Rotham, Yawei Zhang, and Tongzhang Zheng. (2012) Current Understanding of Lifestyle and Environmental Factors and Risk of Non-Hodgkin Lymphoma: An Epidemiological Update. Journal of Cancer	8/4/2012

			Epidemiology, Volume 2012, Article ID 978930, 27 pages. doi:10.1155/2012/978930	
3100			American Cancer Society Article: Second Cancers After Bladder Cancer. https://www.cancer.org/cancer/bladder-cancer/after-treatment/second-cancers.html	1/30/2019
3101			Whi-An Kwon, Jae Young Joung, Jiwon Lim, Chang-Mo Oh, Kyu-Won Jung, Sung Han Kim, Ho Kyung Seo, Weon Seo Park, Jinsoo Chung, Kang Hyun Lee and Young-Joo Won. (2018) Risk of second primary Cancer among bladder Cancer patients: a populationbased cohort study in Korea. BMC Cancer 18:617 (https://doi.org/10.1186/s12885-018-4530-3)	1/1/2018
3102			P Brennan, G Scelo, K Hemminki, L Mellemkjaer, E Tracey, A Andersen, DH Brewster, E Pukkala, ML McBride, EV Kliewer, JM Tonita, A Seow, V Pompe-Kirn, C Martos, JG Jonasson, D Colin and P Boffetta. (2005) Second primary cancers among 109 000 cases of non-Hodgkin's lymphoma. British Journal of Cancer 93, 159 – 166.	6/21/2005
3103			B. K. Kleinschmidt-DeMasters, M.D. and Donald H. Gilden, M.D. (2001) The Expanding Spectrum of Herpesvirus Infections of the Nervous System. Brain Pathology 11: 440-451	1/1/2001
3104			Sylvain Lamure, MD; Camille Carles, MD; Quam	4/19/2019

			Aquereburu; Philippe Quittet, MD; Emmanuelle Tchernonog, MD; Franciane Paul, MD; Eric Jourdan, MD, PhD; AgatheWaultier, MD; Christine Defez, MD; Ihssen Belhadj, MD, PhD; Laurence Sanhes, MD; Sara Burcheri, MD; Daniel Donadio, MD; Carole Exbrayat, MD; Alain Saad, MD; Jean-Luc Labourey, MD; Isabelle Baldi, MD, PhD; Guillaume Cartron, MD, PhD; Pascale Fabbro-Peray, MD, PhD. (2019) Association of Occupational Pesticide Exposure With Immunochemotherapy Response and Survival Among Patients With Diffuse Large B-Cell Lymphoma. JAMA Network Open. 2019;2(4):e192093. doi:10.1001/jamanetworkopen.2019.2093	
3105			Brian C.-H. Chiu, Bhavana J. Dave, Aaron Blair, Susan M. Gapstur, Shelia Hoar Zahm, and Dennis D. Weisenburger. (2006) Agricultural pesticide use and risk of t(14;18)-defined subtypes of non-Hodgkin lymphoma. BLOOD. VOLUME 108, NUMBER 4.	8/15/2006
3106			Monsanto Powerpoint - Crop Protection Messaging Research. Presentation of Final Results	03/23/2015
3107			Roundup Weed & Grass Killer Super Concentrate Labels	
3108			Radiology Powerpoint for Alva Pilliod	
3109			Radiology Powerpoint for Alberta Pilliod	

3110			Dr. Alexandra Levine Expert Report	1/24/2019
3111			ValleyCare Medical Center Consultation Report re Superficial Skin Melanoma – Alva Pilliod	6/9/2011
3112			Specialty Laboratories Test Results for Lymphocyte Enumeration, Basic – Alva Pilliod	12/23/2000
3113			Virolab Test Results for Herpes Simplex virus	12/18/2000
3114			Y-K Chen, C-L Lin, FT-F Cheng, F-C Sung and C-H Kao. (2013) Cancer risk in patients with Hashimoto's thyroiditis: a nationwide cohort study. British Journal of Cancer 109, 2496-2501. Doi:10.1038/bjc.2013.597	10/1/2013
3115			Brian C.-H. Chiu, Bhavana J. Dave, Aaron Blair, Susan M. Gapstur, Joan S. Chmiel, Angela J. Fought, Shelia Hoar Zahm, and Dennis D. Weisenburger. (2007) Cigarette Smoking, Familial Hematopoietic Cancer, Hair Dye Use, and Risk of t(14;18)-defined Subtypes of Non-Hodgkin's Lymphoma. American Journal of Epidemiology Vol. 164, No. 6. Doi:10.1093/aje/kwk044	1/4/2007
3116			Amit Khanal, Nibash Budhathoki, Vijay Pal Singh and Binay K. Shah. (2017) Second Primary Malignancy in Bladder Carcinoma – A Population-based Study. Anticancer Research 37:2033-2036. doi: 10.21873/anticanres.11548.	3/2/2017

3117			Vito Pansadoro, Paolo Emiliozzi, Francesco De Paula, Paolo Scarpone, Alberto Pansadoro, and Cora N. Sternberg. (2002) Long-Term Follow-Up of G3T1 Transitional Cell Carcinoma of The Bladder Treated With Intravesical Bacille Calmette-Guerin: 18-Year Experience. Urology 59: 227–231.	1/1/2002
3118			Rees JR, Zens MS, Gui J, Celaya MO, Riddle BL, et al. (2014) Non Melanoma Skin Cancer and Subsequent Cancer Risk. PLoS ONE 9(6): e99674. doi:10.1371/journal.pone.0099674	6/17/2014

Dated: April 22, 2019

BAUM HEDLUND ARISTEI & GOLDMAN, P.C.

R. Brent Wisner (SBN: 276023)
rbwisner@baumhedlundlaw.com
Michael L. Baum (SBN: 119511)
mbaum@baumhedlundlaw.com
Pedram Esfandiary (SBN: 312569)
pesfandiary@baumhedlundlaw.com
10940 Wilshire Blvd., 17th Floor
Los Angeles, CA 90024
Telephone: (310) 207-3233
Facsimile: (310) 820-7444

THE MILLER FIRM, LLC
Michael Miller *(pro hac vice)*
mmiller@millerfirmllc.com
108 Railroad Ave
Orange, VA 22960
Telephone: (540) 672-4224
Facsimile: (540) 672-3055

MILLER DELLAFERA PLC
Peter Miller *(pro hac vice)*
pmiller@millerdellafera.com
3420 Pump Road | PMB 404
Henrico, VA 23233-1111
Telephone: (800) 401-6670
Facsimile: (888) 830-1488

Plaintiffs Counsel

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES.

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 10940 Wilshire Blvd., 17th Floor, Los Angeles, CA 90024.

On April 22, 2019, I served the foregoing document described as: **PLAINTIFFS' SIXTH AMENDED TRIAL EXHIBIT LIST** on the interested parties and/or through their attorneys of record by depositing the original or true copy thereof as designated below, at Los Angeles, California, addressed to the following:

(X) E-MAIL OR ELECTRONIC TRANSMISSION: In accordance with the Court's Order (CMO No. 2) governing Case No. JCCP 4953 authorizing all documents to be served electronically upon interested parties via Case Anywhere and its litigation system.

(X) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 22, 2019 at Los Angeles, California.

Valeriya Adlivankina

SMOGER DECLARATION

EXHIBIT A2

"ROUNDUP FTO GROWTH INITIATIVE" POWER POINT

Message

From: VOSS, MARTIN C [AG/6042] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=528068]
Sent: 2/12/2009 10:53:36 AM
To: FERREIRA, JUAN A [AG/6042] [/O=MONSANTO/OU=LA-5000-01/CN=RECIPIENTS/CN=151896]; ALBA, ALFONSO [AG/5170] [/O=MONSANTO/OU=LA-5050-01/CN=RECIPIENTS/CN=534006]; BASTIEN, REMI [AG/2440] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=620125]; OLIVER, SAMUEL C [AG/6042] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=116021]; EDGE, MARK [AG/6042] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=16743]; LIARDET, VIRGINIE [AG/5170] [/O=MONSANTO/OU=EA-5170-01/CN=RECIPIENTS/CN=228422]; HEERING, DAVID C [AG/6042] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=68681]; KEY, TREY [AG/6042] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=527428]; VORUZ, NATALIA [AG/6042] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=NNVORU]; LUETTMER-OUAZANE, URSULA E [AG/8481] [/O=MONSANTO/OU=EA-5278-01/CN=RECIPIENTS/CN=530845]; MASSA, LISA J [AG/6042] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=296417]; CASTAING, PHILIPPE [AG/5170] [/O=MONSANTO/OU=EA-5170-01/CN=RECIPIENTS/CN=209553]; NARAIN, D [AG/6042] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=243783]; BAKKER, MARJOLEIN [AG/6042] [/O=MONSANTO/OU=EA-5040-01/CN=RECIPIENTS/CN=8567]
Subject: Roundup FTO Growth initiative
Attachments: Roundup FTO Growth initiative JAN 09.pptx

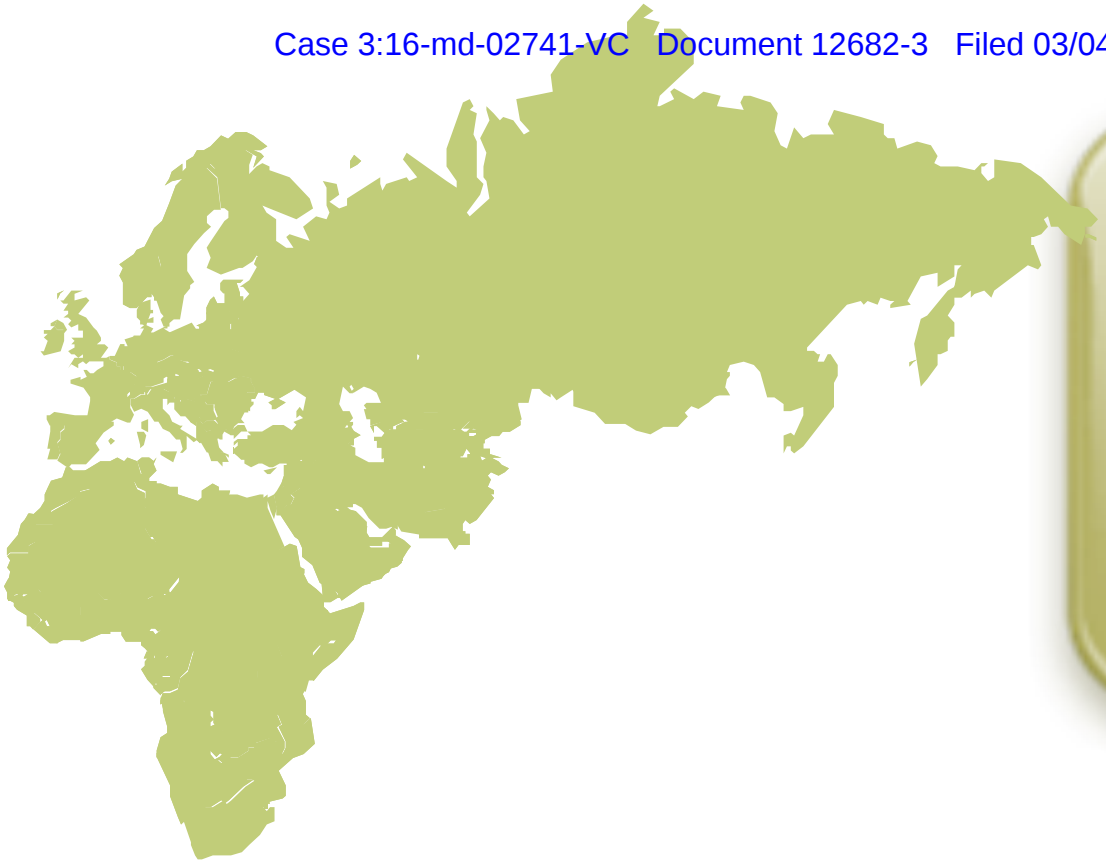
Dear All,

Attached for your reference is the Roundup FTO deck we didn't get to go through today.

Roundup FTO Growth initiative ...

Looking forward to presenting this to you during a telco soon.

Martin



ROUNDUP FTO GROWTH INITIATIVE

MORGES, FEBRUARY 12TH 2009

ROUNDUP FTO AS PART OF THE GROWTH INITIATIVES: WHY?

- Preserve the value of a $470M GP business at the horizon of 2014 (draft LRP EMEA)
- Roundup is key to Monsanto in many aspects:
  - N°1 weedkiller all over the world
  - Fantastic brand
  - Close to 100% awareness amongs farmers around the globe
  - Outstanding contributor to Monsanto earnings
  - Pilar to the development of RR crops
- BUT
  - The political context in Europe is very much « against » pesticides
  - Due to its leadership position, Roundup is the easy target chosen by opponents to attack Monsanto (GMO)

OBJECTIVES OF THE GROUP

- Summarize the issues and better understand what's going on in terms of FTO in Europe
- Raize awareness of risks related to FTO issues and position Roundup FTO as a strategic priority that should be adequately ressouced
- Identify gaps to fill and areas of improvement vs current plans
- How could we make things better or faster?
- Make a recommendation on what incremental ressources would make a real difference and on what initiatives

FTO BACKGROUND

- Number of issues within the EU are beginning to have potential impact on the continued registration of Roundup
- Decisions are now politically motivated; in the past the regulatory system was science based
- Renewal of the Annex I inclusion of Glyphosate (expires in 2012)
- => political considerations determine the continued or restricted use of PPP
- Need to engage in the political debate above our current activities to ensure that regulators and politicians are able to make informed decisions on the future registration of Glyphosate

KEY ISSUES – EXTERNAL

- Registrations are under pressure and will be restricted
- Losing a use or a registration has much more impact on the business vs a competitive product and it is immediate
- Pressure on Roundup is increasing
  - Water detects
  - Dominant position
  - Volume increase
  - NK603 introduction
  - Tox allegations
  - Weed resistance
- High awareness of Roundup is fuelled by adverse publicity => easy target with high political value
- => influence on regulatory restrictions
- ROUNDUP (and Monsanto) are the target rather than glyphosate or generic products
- Few allies for Ag Chem who will stand up and be heard
- Knowledge gap: few potential allies understand the value of the product
- Retailers (L&G) are considering moving to less controversial brands
- Restrictions and taxation of classified products

PRESS ARTICLES

Herbicide, danger !

Les soupçons se renforcent contre le Roundup. Une étude française conclut à sa toxicité pour les femmes enceintes.

Le Roundup pourrait provoquer des fausses couches et des avortements spontanés.

Alertez les bébés : le Roundup, nom commercial du glyphosate, l'herbicide le plus vendu au monde, produit par Monsanto, serait susceptible de provoquer des fausses couches, des avortements spontanés et des malformations chez les femmes enceintes. Selon une étude réalisée par l'équipe de Gilles-Eric Séralini, professeur de biologie moléculaire à l'université de Caen, et qui sera publiée en juillet prochain dans une revue américaine, le pesticide et ses adjuvants ont des effets délétères sur les cellules embryonnaires humaines et agissent comme un perturbateur endocrinien.

« La toxicité apparaît à des concentrations très faibles, 10 000 fois moins élevées que celles du produit vendu dans le commerce », explique le chercheur. Ce résultat vient confirmer d'autres études inquiétantes sur le même sujet. En 2002, des chercheurs du CNRS de la station biologique de Roscoff (Finistère) ont montré que la glyphosate perturbe la régulation de la division cellulaire, selon un mécanisme à l'origine de nombreux cancers. Des biologistes australiens ont de leur côté mis en évidence une division anormale des cellules rénales provoquée par le désherbant chez des souris.

Il semble que cette toxicité est directement liée non à la molécule active de l'herbicide, mais aux adjuvants qui lui sont associés. Sous sa forme pure, le glyphosate n'adhère pas aux feuilles : c'est pourquoi il est toujours dilué dans des produits « surfactants » qui lui permettent de pénétrer dans les cellules végétales. « Le problème, remarque Gilles-Eric Séralini, c'est que les tests d'homologation ont été conduits sur la molécule de glyphosate elle-même, et ne tiennent pas compte de ces adjuvants. » Jointe par *L'Express*, la société productrice n'a pas donné suite.

Gilbert Charles

« Aucun élément nouveau », selon Monsanto

Le Roundup est un désherbant utilisé par les professionnels et les jardiniers amateurs depuis 1974. L'entreprise américaine dont le siège est à Saint-Louis, dans le Missouri, emploie 17 000 salariés dans 90 pays. Elle dispose d'une antenne en France à Lyon.

Joints hier soir par téléphone, la direction se dit confiante face aux résultats de l'enquête menée, à Caen, par l'équipe du professeur Gilles-Eric Seralini. « S'il pense détenir des éléments nouveaux, qu'il les communique aux autorités compétentes. Nos produits sont soumis à des tests et à des procédures d'évaluation sanitaires et environnementales très strictes réalisées par des comités scientifiques des nombreux pays dans lesquels le Roundup est autorisé. Nous nous y soumettons. Dans un souci de transparence, nous allons communiquer à l'Agence française de sécurité sanitaire des aliments (Afssa) ce travail et lui demander de réagir. Nous l'avions déjà fait lors d'une enquête précédente du professeur Seralini en 2005. À l'époque la Commission des toxiques n'avait rien trouvé à redire. »

En Allemagne, un autre produit de Monsanto est actuellement sur la sellette. En s'appuyant sur une étude faite par Greenpeace, les autorités de ce pays ont décidé de suspendre la commercialisation du maïs Mon 810. En France, Alain Juppé a, lui aussi, indiqué qu'un moratoire pourrait être décidé.

L'étude Greenpeace démontre que « la sécrétion de la toxine insecticide ne se fait pas comme prévu ». Pour Monsanto, « la demande du gouvernement allemand pour un plan de surveillance de la culture du Mon 810 est fondée sur des résultats connus qui ont déjà été pris en compte par les autorités sanitaires et qui n'apportent aucun élément nouveau ».

Là encore, Monsanto suggère « de la soumettre aux autorités réglementaires et scientifiques françaises ou européennes ».

En France, environ 30 000 hectares de maïs OGM seront cultivés, selon les déclarations de semenciers recueillies par les ONG. Le maïs Mon 810 vise à protéger les cultures de la pyrale du maïs, une sorte de papillon dont les larves se nourrissent de l'intérieur des tiges de la plante.

P. M.

Le Roundup est mis en cause par l'équipe du professeur Seralini. La firme Monsanto, qui le fabrique, conteste tout danger.

Le Roundup nocif pour les cellules humaines

Une étude réalisée, à Caen, par le laboratoire du professeur Gilles-Eric Séralini s'inquiète des effets du désherbant Roundup sur la santé.

La dernière étude faite par votre laboratoire dénonce les effets du Roundup sur la santé

Nous avons voulu voir quels étaient les effets du Roundup sur les cellules embryonnaires. Même à des doses considérées comme non toxiques, le produit empêche la formation d'hormones sexuelles essentielles au bon développement du fœtus, à ses os et à son sexe.

Comment avez-vous travaillé pour obtenir de tels résultats ?

L'étude porte sur des cellules en culture, sans destruction d'embryon. Nous avons travaillé en diluant 10 000 fois le produit vendu en magasin. Je suis inquiet, car on risque de retrouver des résidus de Roundup dans des aliments commercialisés aux États-Unis, en Australie mais aussi en Europe. Pourquoi ? Tout simplement parce que certaines plantes OGM sont conçues pour résister à ce désherbant et finissent donc par en être imprégnées.

Pourquoi avoir centré cette étude sur le seul Roundup, un désherbant fabriqué par l'entreprise Monsanto ?

Le travail réalisé par l'équipe de l'université de Caen s'intéresse aux effets des pesticides sur la santé. Qu'on les retrouve ou non dans des OGM. Nous nous intéressons notamment aux effets sur la reproduction et les maladies hormonodépendantes. Le Roundup est le pesticide désherbant le plus utilisé dans le monde. Sans même parler des OGM, le Roundup pollue les eaux de surface. On peut même considérer ses résidus parmi les plus polluants.

Gilles-Éric Séralini.

Vous estimez que la réglementation européenne n'est pas au point ?

La réglementation européenne pour les homologations des produits phytosanitaires liste des molécules, mais pas forcément leur assemblage pour obtenir un produit. Or, c'est ce mélange final qui peut avoir des conséquences sur la santé. Le Roundup est, à n'en pas douter, un mélange bien plus nocif que le seul glyphosate qui fait partie de sa composition. C'est le glyphosate qui a été analysé pour obtenir les autorisations et non le Roundup en tant que tel. Nous pensons que cela n'est pas bien pris en compte dans la genèse possible de certaines maladies génétiques ou hormonales.

Pourquoi avoir choisi de publier votre étude aux États-Unis ?

Il est dans la mission des scientifiques de faire connaître les résultats de leurs recherches au meilleur niveau international. De plus, nos travaux précédents avaient été bien accueillis aux États-Unis, notamment par le chef scientifique du bureau de protection environnementale du procureur général de l'État de New York, lequel avait été impliqué dans le procès en 1996 contre le Roundup de Monsanto.

Recueilli par **François LEMARCHAND.**

L'herbicide Roundup toxique pour les cellules embryonnaires

L'herbicide le plus utilisé au monde, le ***Roundup*** de Monsanto, a des effets délétères sur des cellules embryonnaires et des tissus placentaires humains, et agit comme un perturbateur endocrinien, selon une étude dirigée par Gilles-Eric Séralini (université de Caen), membre du Comité de recherche et d'information indépendantes sur le génie génétique (Criigen). Ces résultats, publiés le 4 mai dans la revue Archives of Environmental Contamination and Toxicology, complètent des travaux de 2005. *"On observe les premiers effets toxiques à des doses 10 000 fois moins concentrées que la formulation vendue en magasin"*, indique M. Séralini. Ces effets augmentent au fil du temps. Le ***Roundup*** est, en outre, plus toxique que son principe actif, alors que la majorité des tests avant homologation sont conduits sur cette seule molécule, le glyphosate, regrette le chercheur.

KEY ISSUES – INTERNAL

- Defense of Roundup brand and use is key to allow RR launch and development
- Roundup is no longer a “cash cow” => critical business priority, alone and for future RR business
- Internal knowledge gaps; awareness and priority of chemistry vs biotech/seed defense
- No formalized way of exchanging FTO info across the EA org.
- No political lobbying for Roundup (generic agchem through ECPA)
- CA targets only recently aligned to support Roundup
- Portfolio developments used to focus on COGs and efficacy, not on low risk/hazard (classifications)
- Opportunity to build and defend brand value by taking leadership

SO FAR, FTO ISSUES HAVEN'T HAD CLEAR IMPACT ON THE AG BUSINESS…

- … but RISK IS HIGH:
  - Loss or restriction of registration would have a direct and immediate impact on the business
    - Buffer zones vs water points: already implemented
    - Registration withdrawals on coco-amine formulations in FR
    - Politically driven project in GY for ban of tallow-amine based formulations
  - What happens in one country (FR, GY, NL) could have short or mid term an impact in other countries –ripple effect
- L&G and Industrial markets already affected:
  - French L&G distribution turning away from chemical pesticides (retailer Botanic) or just from Roundup (choice of a less controvertial brand)
  - Huge pressure through legal cases (complaints for misleading advertising) – success rate of legal cases in FR has dropped dramatically vs past
  - Banning of pesticides uses in some municipalities

MANY FTO INITIATIVES GOING ON IN EUROPE

- Roundup FTO group in Brussels (Xavier Belvaux): RA/SA/CA
  - EQS: Avoid inclusion of glyphosate and AMPA in the PSH list (hazardous substances list)
  - Annex 1 renewal at EU level
  - Prepare ground for RR introduction
  - Sustainable use directive
  - Assess Impact of Best Practices: initiate new studies (hard surfaces, vineyards…)
- TD and Stewardship ongoing efforts
  - Water detects: contacts with water industry, studies, monitoring analysis
  - Weed resistance management: LT approach to building network
  - Benefits document
- Political lobbying through ECPA
- Scientific support: need to identify scientists per country (position papers,…)

- Local initiatives such as in France:
  - Develop farmers networks (CT) to talk about Rup for their own ag practice=> field work
  - Use other farmers as stakeholders to avoid ban of chemical cover crop destruction (before June 2009)
  - Organization modified to take FTO into account
  - Need for specific L&G and amenities projects

MANY INITIATIVES BUT WITH A LACK OF COORDINATION

- No need to reinvent the wheel
- But clear need to circulate at country level what's happening at EU level and the other way around
- Missing processes: need to treat FTO as a strategic priority and manage it as a marketing plan (who, what, when, how much?)
- ROUNDUP FTO NEEDS A CHAMPION AT EMEA LEVEL
- ROUNDUP FTO NEEDS A TASK FORCE
- Additional ressources would allow to better or faster exploit existing material, to create new material (studies for example) to justify our assertions, and to communicate

ROUNDUP FTO CHAMPION

- Coordinate actions
- Ensure consistency in communication around FTO issues
- Create links with other initiatives (such as CA/Biotech Growth Initiative and SYI)
- Lead a Roundup/Glyphosate FTO task force
- Clearly identified person in charge with full endorsement of EMEA management
  - Could be European Agchem PM (open position)

ROUNDUP/GLYPHOSATE FTO TASK FORCE

- Multi-functional group with representatives of
  - Agchem Businesses
  - Regulatory affairs
  - Scientific affairs
  - Corporate affairs
  - TD & Stewardship
- Agree on Roundup FTO Strategy
- Define an annual Action plan, priorities and ressources
- Ensure inclusion of action plan in yearly budget exercice
- Coordinate at country level: assign Roundup FTO responsibility (person or multi-fonctional group)
- Measure progress and assess results

IDENTIFIED NEEDS: TRAINING (1/2)

INTERNAL

- Raise awareness of FTO issues and their importance for the company
- Train sales forces, TD, new comers and potentially all employees

EXTERNAL

- To farmers and retailers:
  - provide basic information on Roundup
  - Need to reassure them on
    - Toxicity
    - Ecotoxicity
    - Resistance
    - Usage
    - Regulatory evolutions

IDENTIFIED NEEDS: TRAINING (2/2)

INTERNAL

- Proposed actions:
  - develop CBT mandatory for all employees. Cost: 50k$ to 200K$; Timing: 6 months to 1 year (« regular » CBT or on-line tailor-made training such as Roundup Academy in L&G…)
  - Include FTO objectives in the DPR to make sure each employee participates in the effort . No cost; as of 2010 goal setting exercice
  - FTO special section in On-boarding programs in all countries:
    - make status of existing programs at country level
    - Identify synergies
  - Identify at least one FTO champion in each country

EXTERNAL

- Retailers:
  - include training of distribution sales forces into commercial policy
    - Face to face in annual meetings
    - CBT
  - Use ECPA & local industry associations to initiate trainings on PPP
    - Use TOPPs material
- From retailers to farmers:
  - Cascade above training to growers
- Directly to farmers:
  - Use the Internet
  - Organize at local level special events around weed resistance management

IDENTIFIED NEEDS: COMMUNICATION (1/2)

INTERNAL

- Be ready to reactively address issues when they arise
- Communication strategy made clear to employees
  - Vs current misunderstanding
- More support needed from CA

EXTERNAL

- Be vocal to defend the brand, express our position & restore trust
  - With customers
  - With farmers/users
  - With the media
- Develop proactive communication on Roundup: create opportunities to deliver positive messages on the brand
- Identify Stakeholders (KIPs) for endorsement

IDENTIFIED NEEDS: COMMUNICATION (2/2)

INTERNAL

- Position papers , Q&A ready on time
- Management support and clear communication in crisis context (cf MM. Robin case)
- CA teams in some countries (FR) made able to address immense task (GMO and Roundup FTO in AG, Amenities and L&G) and defend businesses
  - Dedicated headcount for Roundup FTO?
  - Benchmark our current organization vs competition
  - PR/PA agency support

EXTERNAL

- Customers:
  - Newsletters/regular communication
  - Information meetings with teams/special events
- Farmers:
  - Make better use of Internet to communicate directly to farmers
  - Benefits document
- Media:
  - Use study results to create new news
  - Explain benefits (link with Benefit document)
  - Links with SYI
  - Constantly promote and explain Best Practices (use TOPPs messages)
- Stakeholders:
  - establish process and plan for political lobbying, create missing link with country teams

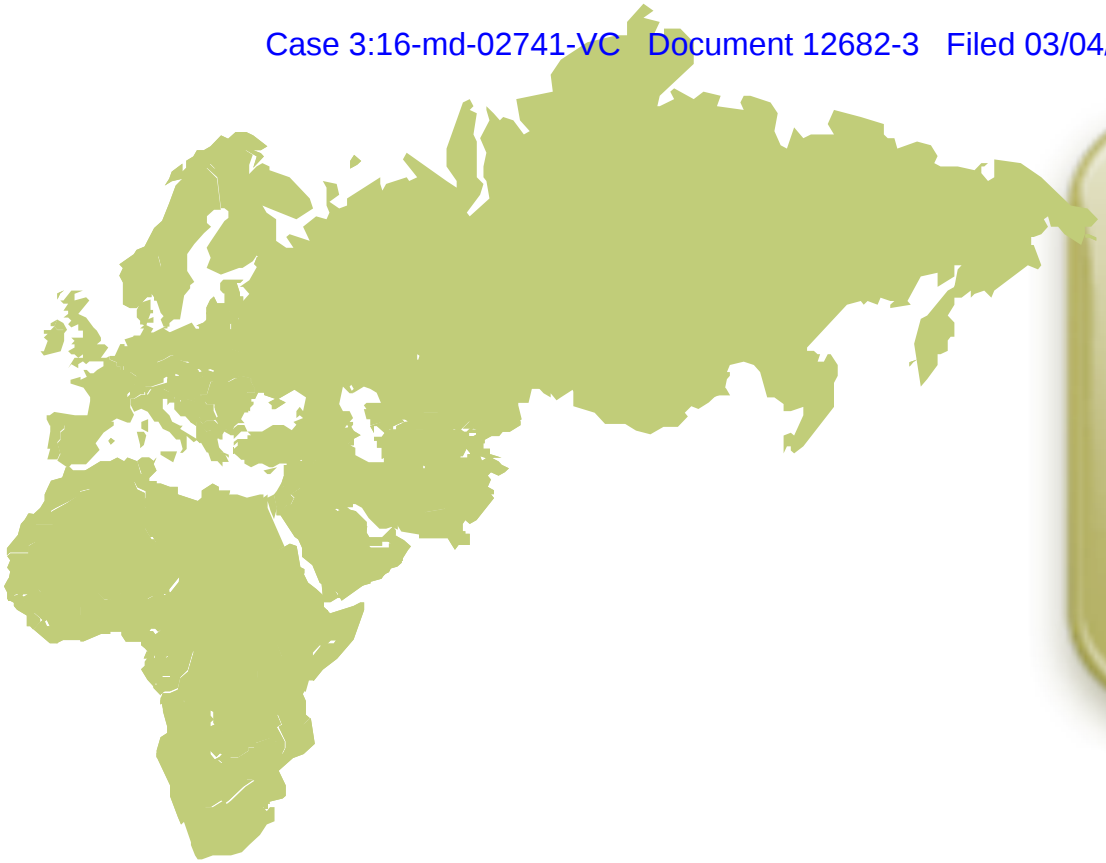
SUMMARY

- FTO is a critical piece of our business
- Risk is high, politically driven, emphasized by anti-pesticides context => NEED TO PREPARE FOR THE FUTURE
- Need to better organize & ressource the defense of Roundup and glyphosate

- Implement adequate organization to focus on Roundup FTO and coordinate efforts
- Manage FTO plan as a marketing plan, included in yearly cycle
- Build stronger bridges between global and local initiatives
- Better communicate around actions
- Better valorize key initiatives, esp those who will have impact in other countries

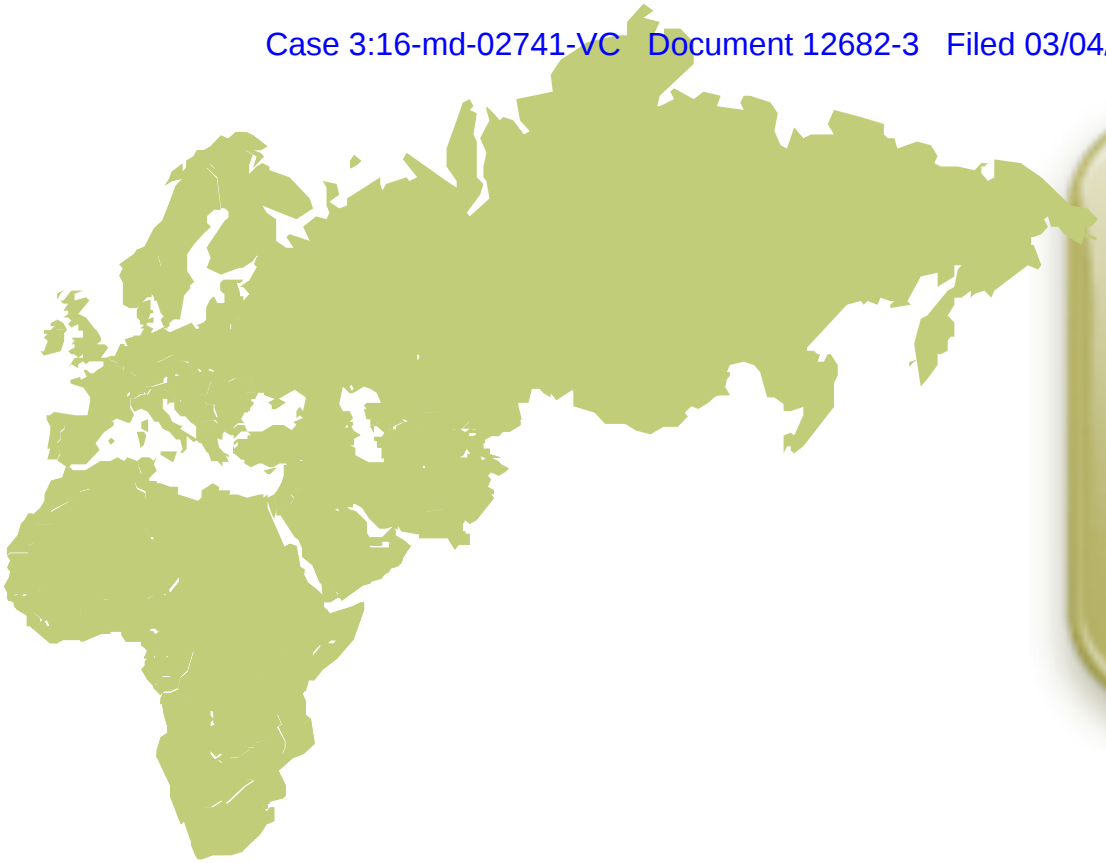
NEXT STEPS

- Elect the Roundup FTO champion
  - Who: Agchem lead with endorsement of EMEA LT
  - When: now or within recruitment timing (EMEA Agchem PM?)
- Gather the Roundup FTO task force & lead:
  - Who: TBC with endorsement of EMEA LT
  - When: now
- Define EMEA Roundup FTO strategy and detailed action plan including plans at country level
  - Who: Roundup FTO champion and Roundup FTO task force
  - When: ASAP



Roundup

THANK YOU

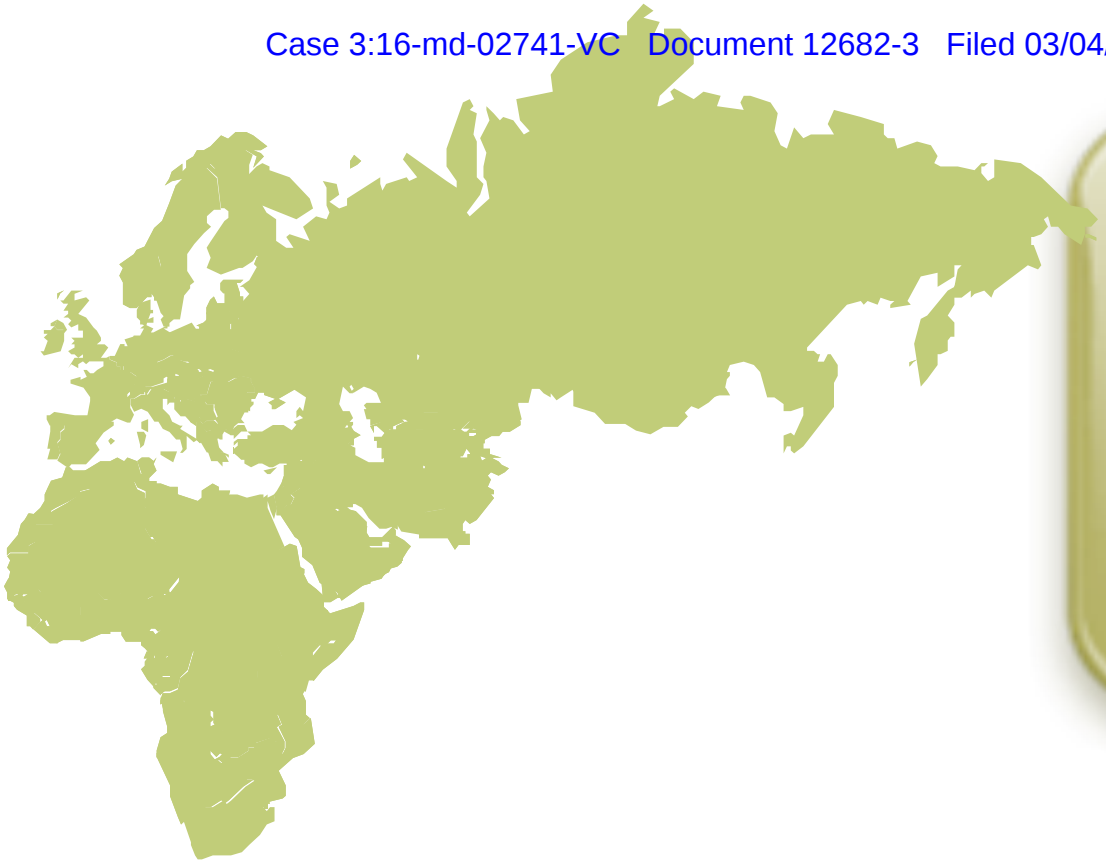


BACKUP SLIDES

FTO ISSUES NOT AFFECTING ALL EMEA COUNTRIES SAME WAY

Volume in KREL / GP in US$@ 2014 LRP Parity		Actual Volume 2008	Draft Volume 2014	Draft GP 2014	Volumes growth 14 vs 08	Risk/health problem	Risk/Water detects	Risk/efficacy, resistance	Benefits Perception	Acceptance pressure
		@ LRP 2014 Parity								
Germany	GLYPHOSATE	11,319	10,553	83,061	-7%					
France	GLYPHOSATE	13,079	11,591	55,879	-11%	**	***	*	*	***
Poland	GLYPHOSATE	6,619	5,910	45,222	-11%					
Spain	GLYPHOSATE	8,023	7,700	31,121	-4%			*	**	
SouthAfrica	GLYPHOSATE	5,267	8,585	27,049	63%					
UK	GLYPHOSATE	5,181	4,512	25,917	-13%					
Italy	GLYPHOSATE	4,494	5,302	24,331	18%			*	**	
Russia	GLYPHOSATE	2,903	6,300	19,929	117%	(*)		*	**	
Benelux	GLYPHOSATE	2,178	1,811	16,091	-17%					
Czecho	GLYPHOSATE	1,502	1,496	12,884	0%					
Ukraine	GLYPHOSATE	1,625	3,100	11,318	91%			*	*	
Baltics	GLYPHOSATE	1,897	1,828	10,931	-4%					
CIS	GLYPHOSATE	3,397	2,750	9,623	-19%			*	*	
CESAfrica	GLYPHOSATE	1,623	2,833	9,256	75%					
Denmark	GLYPHOSATE	1,719	1,539	8,972	-10%					
Greece	GLYPHOSATE	1,306	1,439	7,455	10%					
Sweden	GLYPHOSATE	1,092	1,060	7,264	-3%					
Ireland	GLYPHOSATE	1,254	1,000	6,997	-20%					
WestAfrica	GLYPHOSATE	3,569	2,278	6,367	-36%					
Finland	GLYPHOSATE	967	866	6,332	-10%					
Portugal	GLYPHOSATE	1,187	1,301	6,327	10%					
Hungary	GLYPHOSATE	1,007	1,425	6,028	41%					
Turkey	GLYPHOSATE	957	1,350	5,010	41%					
Norway	GLYPHOSATE	854	750	4,338	-12%					
Romania	GLYPHOSATE	363	1,080	4,062	197%					
Switzerland	GLYPHOSATE	398	465	3,189	17%					
Austria	GLYPHOSATE	338	316	2,922	-6%					
Slovakia	GLYPHOSATE	322	515	2,769	60%					
Middle East	GLYPHOSATE	978	752	2,577	-23%					
Bulgaria	GLYPHOSATE	229	300	1,225	31%				*	
Croatia	GLYPHOSATE	192	250	1,072	30%				*	
TOTAL		86,095	90,957	465,518	6%					

Ranking of countries on 2014 LRP GP
Determine which FTO/Stewardship factor
Affects each country and which has most impact on GP



KEY ISSUES
FTO IN FRANCE

FTO SITUATION IN FRANCE

- Monsanto is the final target but ROUNDUP is attacked
- Post M-M. Robin situation in 2008:
- HUGE press coverage
  - From 100 million in 07 to over 250 million negative contacts in 08
  - Roundup as a product is attacked
    - Toxic
    - Cancer
    - Poison
    - Gardeners asbestos
    - Polluting
    - Recently proved to be carcinogenic
    - Endocrine disruption
- Seralini « 3 » to start 2009 with
- Monsanto not vocal => critical political decisions with restrictions

ROUNDUP ON THE MEDIA SCREEN / CONSEQUENCES

- For Roundup
  - Restrictions could directly impact our business
    - Uses the more at risk: vineyard / Around the farm / amenity / L&G
  - Media pressure is damaging / eroding the high value perception of Roundup brand
  - Roundup: the only brand quoted
    - Perception that Roundup is more dangerous than a generic formulation
- For pesticides
  - A legal ban of advertising is possible

A DEBATE WITHOUT REFEREE

- Public opinion
  - Frustrated by recent food scares: BSE, dioxin, contaminated blood
  - Increasing public sensitivity to agriculture practices (pesticides, GMOs)
  - Unacceptable perceived water contamination with pesticides
  - Lack of experts and scientists' credibility
- Politicians and local authorities
  - Promotion of sustainable agriculture by Minister of Ag, including pesticide volume reduction
  - More and more decentralized and non concerted actions / decisions / controls
  - Organic-like agriculture systems promoted by politicians, public and stakeholders
  - Some non rational decisions have been taken by politicians
    - French level: ban Regent and Gaucho
    - European level: paraquat non inclusion
    - Le Grenelle de l'Environnement
  - Authorities don't even dare defend current evaluation system in front of attacks

FTO ISSUES

- A general context: opponents and official messages are to ban / reduce pesticides use

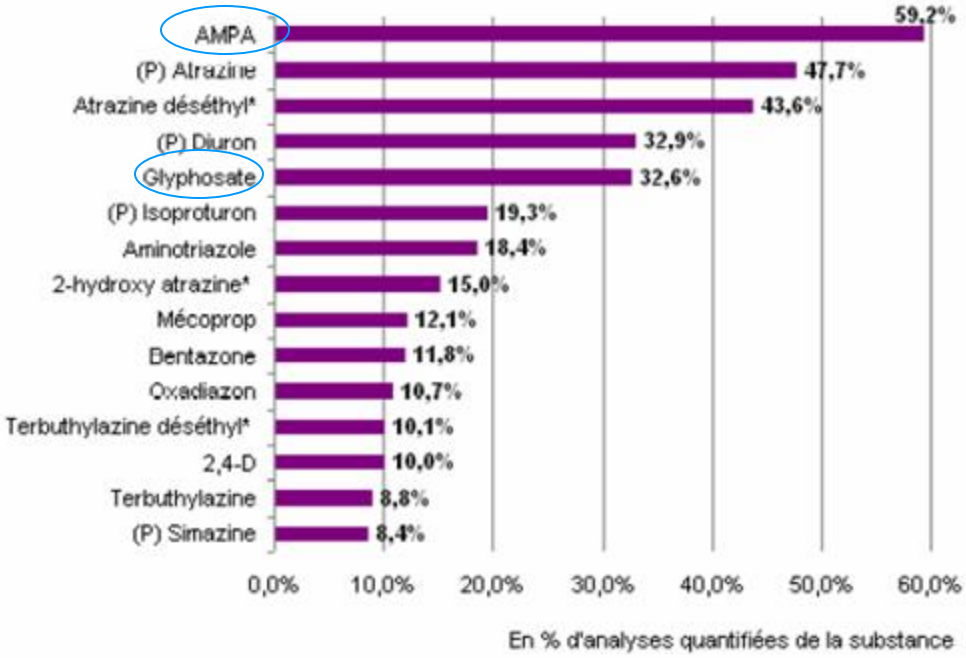
- 2 months of media crisis: MM Robin Documentary & book / new GMO bill
  - Broadcasting of the documentary by Marie-Dominique Robin “the world according to Monsanto”
  - 1st target: GMO
  - Lot of negative messages on Roundup, a “product which carcinogenicity is now proven”
  - widely announced by the media several weeks before
  - The rapporteur of the GMO bill at the National Assembly even quoted the documentary in his official report
  - A Green MP organized a viewing of the documentary at the National Assembly, just the day before the Plenary discussion of the GM bill (March 31)
  - The book is distributed to politicians / Monsanto was quoted 50 to 60 times during the debate at the National Assembly
  - The strategy of the opponents to GM is very clear: they want to kill Monsanto, to kill the technology and to stop the GM law

NITRATE DIRECTIVE

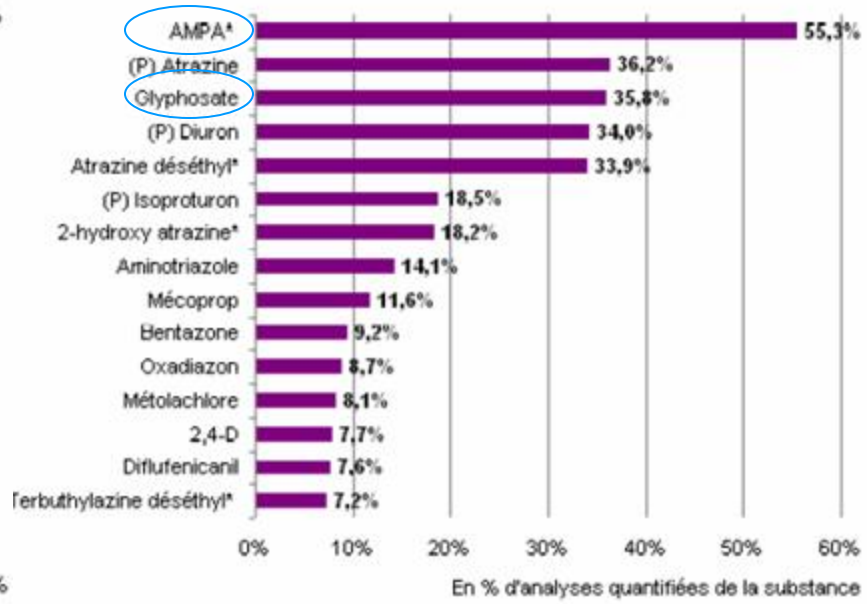
- France has been condemned by Europe for nitrates content in drinking water above 50g/l.
- On March 26, the Ministers of Ecology and Agriculture have published a ‘circulaire’ (official document) giving recommendations to local authorities to write decrees for water quality improvement.
- Measures on ‘water sensitive areas’ must be published on January 2009.
- The frame given by the Ministers are:
  - Permanent buffer zone of minimum 5m along all water bodies
  - Cover crop on all soils during the period of risk of run off. On all vulnerable area, the cover crop will be an obligation. The objective is to reach 100% of cover of the cultivated areas for 2012.
  - The issue: they recommend mechanical destruction of the cover crop and propose the prohibition of chemical destruction
- Local (département) decision to be taken before the end of this year
  - A lot of discussion will occur in July
- In Poitou: vulnerable area / the battle is uncertain => decision made to cancel billboard campaign for summer 08

WATER DETECTION / WATER FRAMEWORK DIRECTIVE

2003 data / IFEN Report



2004 data / IFEN Report



- Implementation of the Water Framework Directive
  - ✓ Draft Water Agency « Seine Normandie »
  - ✓ Reduce by 30 % to 50 % the glyphosate presence in water

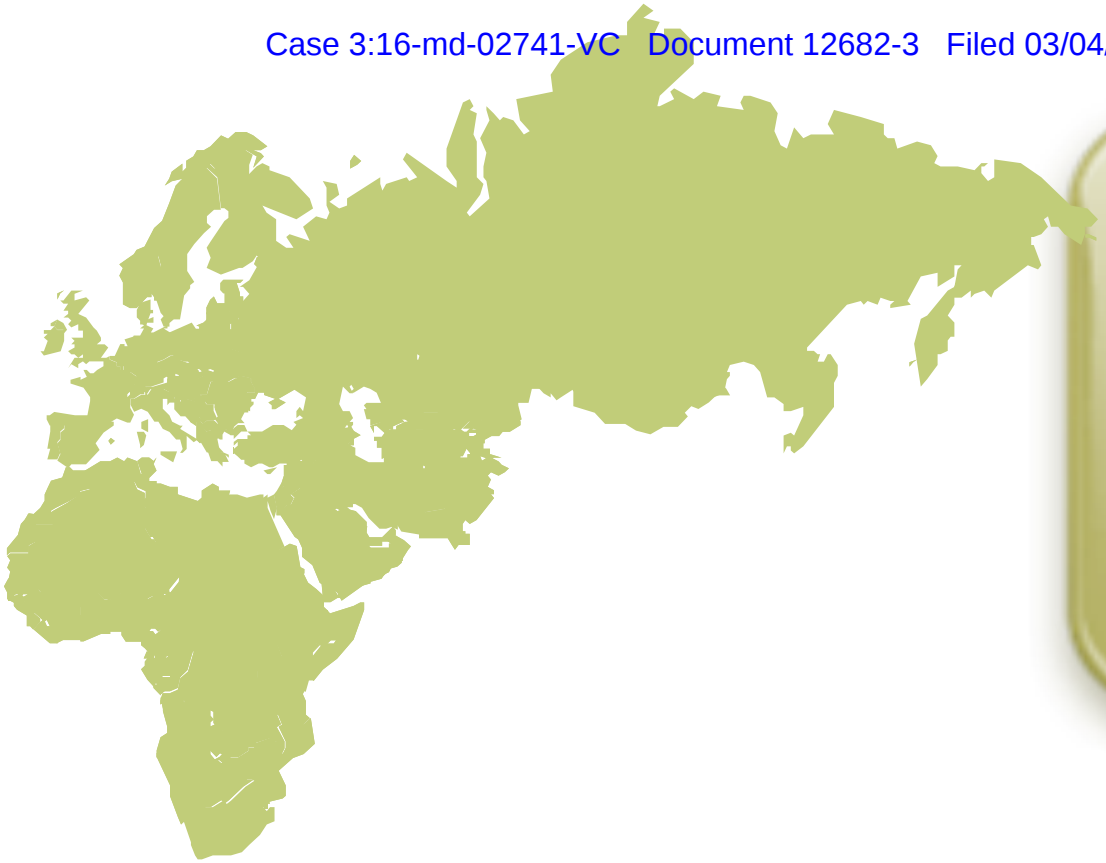
WHAT DO WE DO?

Stewardship / technical teams

- Glyphosate water contamination:
  - Create and provide information's/tools necessary to scientifically defend glyphosate water issues
- Glyphosate & Roundup Tox allegation :
  - Defend glyphosate & Roundup against all toxicological allegations (Bellé / Seralini … studies) by asking to the officials or independent experts to write reports/publications refuting their conclusions
- Glyphosate weed resistance management
- Glyphosate GAP promotion
- Farmers mobilization to defend gyphosate

DO WE HAVE TO GO FURTHER?

- There is effectively no political lobbying for Roundup: generic agchem through Industry Unions (ECPA / UIPP)
- Proactive action
  - Alignement of our messages
    - Good sharing « internally »: Monsanto / Scotts / Industry unions / Supportive Farmer associations
  - Define our targets
  - How can we leverage our messages to our key targets?
    - Priority / Resources
- Communication crisis
- Secure our future portfolio with non classified formulation



FRANCE PUBLIC AFFAIRS

COMMUNICATION STRATEGY

PROPOSALS

GLOBAL & FRANCE MEETING
LA GRANDE MOTTE, 2008 JULY 8TH AND 9TH

CONTEXT : ATTACKS, THREATS BUT POTENTIAL

- Why France has such reaction to our activities?
  - Emotional on food
  - Tradition of ideology and contestation
  - Debates are not science-based
  - Sanitary crisis
  - Farmers disliked
  - Leadership disliked - anti-americanism
- Very active opponents - orchestrated attacks
  - Roundup and MON810 strongly challenged → permanent crisis
  - Robin's movie → company reputation is a disaster
- Threats to Monsanto : doubts are growing with potential risk for business
  - Scaring leadership
  - « Fantasm » on Monsanto emphasized by our silence
  - Public opinion creates conditions of decisions → we are the « symbol to kill »
    - MON810 – ban
    - Roundup – risk of restrictions
    - Monsanto – diffamation
- Opportunities
  - Global context
  - Facts and products « are playing for us »
  - Vocal stakeholders and wide network
  - Confused but very motivated teams

TODAY, GLOBAL CA GUIDELINES ARE DIFFICULT TO USE IN FRANCE

• Biotechs more than Roundup

CA communication focused on biotechs because priority given to « not yet accepted » techs → Today, Roundup « acceptation » is threatened too

• Stakeholders more than Monsanto

« Pool game » strategy because stakeholders are more credible than us → Today, Monsanto's reputation makes it difficult to find vocal stakeholders who are expecting Monsanto to be vocal too : in France, you are suspected to be corrupted by Monsanto if you claim you are pro-biotech

• Benefits more than issues

Communication expected on benefits because communication on issues is disturbing and makes polemics bigger → Today, fire is maintained by the activists whatever our silence, and our refusal to responde on issues presents Monsanto as an arrogant and media opportunist company

TODAY, WE RECOMMEND TO BUILD A MORE OFFENSIVE STRATEGY OF COMMUNICATION

- Challenges
  - a technology « to be accepted »
  - an agchemical product which is an « clay feet colosseum »
  - an «unpleasant » company….in France

- The strategic proposal
  - Multitargets
  - Pluritactical
  - Customized for France

- Structure of the strategy : 3 focus
  - Biotechs : remain the « heart » of CA communication
  - Roundup : the emergency of CA communication
  - Monsanto corporation : critical situation → we want and have to become « pleasant »

2) ROUNDUP

ROUNDUP : CONTEXT

- Pesticides : post-grenelle + organic fashion
- Roundup and glyphosate : 3 weaknesses
  - Water detections
  - Lack of studies on the surfactant
  - GP advertising necessary to Garden brand leadership
- Image + regulatory threat : risk of imminent ban or restriction
  - Local decrees of ban already taken
  - Rationalization of gly uses by French technical institutes
  - Risk of Roundup listed on EU priority listing for water monitoring
  - Gaucho/Regent scenario → irreversibility beyond any scientific assessment
  - Attack against Monsanto and biotech via Roundup (symbol of « pesticides to kill »)
- Current limits
  - Silence does not stop fires → critical point
  - Difficult to get scientist or farmer endorsement if we remain silent
  - Roundup com = « vicious circle » → defend the product without exposing it too much
  - Is a lawsuit an option ? Chances to win are close to inexistant…

ROUNDUP : OBJECTIVE ET TACTICS

- Objective : maintain key decision-makers' perception positive on Roundup safety and utility in order to secure approved uses and users' access

- Tactics: neutralize attacks in order to initiate positive communication
  - Limitate increasing unpopularity of Roundup falling down false allegations
    = restore acceptable conditions of reputation for the product
  - encourage recognition that sustainable ag will go through Roundup use
    = start to install Roundup as a sustainable tool

- 5 tactical focus

  1) Media: Monsanto to be vocal in the media in order to encourage endorsement by our allies

  2) GP Journalists : reduce false media allegations and create opportunities for network

  3) Authorities : alert them on utility of glyphosate pointing the threat of a restriction scenario

  4) Customers and users : motivate them to be vocal on glyphosate as a sustainable tool

  5) Our teams : arm our teams to better forward Roundup messages

1. MEDIA: MONSANTO TO BE VOCAL IN THE MEDIA TO ENCOURAGE ENDORSEMENT OF ROUNDUP MESSAGES BY OUR ALLIES

- Targets : general public media and trade media
- Messages : Roundup is safe and useful, Monsanto defends it publicly
- Actions
  - Reactive PR→ press releases, press conferences and briefs, interviews – 08/09
    - Not wait for media requests
    - Works when we do it - examples
  - Proactive PR → PR agenda to develop positive stories and coverage – 08/09
- Some tools
  - Support of a PR agency – logistics and production
  - Reassuring Roundup brochure (utility, safety, environment) - Oct 08
  - All Q&A about Roundup
  - Q&A about utility oriented on« which consequences for Ag and Lawn markets in case of use restrictions? »

2. GENERAL PUBLIC JOURNALISTS : REDUCE FALSE MEDIA ALLEGATIONS AND CREATE OPPORTUNITIES FOR NETWORK

- Target : general public journalists
- Message : a lot of false allegations on Roundup and glyphosate
- Action : « off » mails to chief editors in case of very bad and false coverage
  - Make regular pedagogy and show proofs of openminded attitude
  - Non hostile mails – informative and argumentative
  - Example of the Pesticide Union
- Some tools
  - Support of a PR agency
  - Reassuring Roundup brochure (utility, safety, environment) - Oct 08
  - All Q&A about Roundup
  - Q&A about utility oriented on« which consequences for Ag and Lawn markets in case of use restrictions? »

3. AUTHORITIES : ALERT THEM ON GLYPHOSATE UTILITY POINTING THE THREAT OF A « RESTRICTION » SCENARIO

- National and local political and regulatory decision-makers
- Message : Roundup is a necessity for Ag and towns + good practices
- Action : emergency plan of local contacts for Britanny – 3Q/4Q 08
  - 3 priority regions → reactive contacts in case of issue
  - Brittany pilot region → Preventive contacts (RA, Marketing, TD, commercial – coordination by PA lead)
    - Local and regional administration
    - Ag Chambers
    - Mayors
    - Env associations → mapping
    - Water production unions → mapping
- Some tools
  - Q&A about utility oriented on« which consequences for Ag and Lawn markets in case of use restrictions? »
  - Proposal « what would we let ifit was requested »
  - Reassuring Roundup brochure (utility, safety, environment) - Oct 08
  - All Q&A about Roundup
  - Analysis of IFEN water data

4. CUSTOMERS AND USERS : MOTIVATE THEM TO BE POSITEVELY VOCAL ON GLYPHOSATE AS A SUSTAINABLE TOOL

- Target : customers and users –Ag and non ag markets
- Message : utility and good practices
- Actions
  - Actions targeting ag and non ag customers and users
    - Create a « Roundup Price » to encourage projects limitating glyphosate presence in water - 09
    - Attend agricultural general public fairs with Roundup kits - 09
    - Monsanto presence in the media (cf infra) – 08/09
  - Actions targeting Ag customers and users
    - Set up and moderate local think tanks (distrib/farmers) on Roundup - 09
    - Help reduced or no tillage farmers networks to defend glyphosate - 09
    - Contribute to legitimate IAD - 09
    - Convey positive messages on Roundup at coops commercial launches – oct 08
  - Actions targeting Garden customers
    - Scotts : regional tour + e-learning – Apr 08 + 09
    - Retailers : direct link with Monsanto – 08/09
- Some tools
  - GP animation kits
  - e-learning
  - Reassuring Roundup brochure (utility, safety, environment) - Oct 08

5. OUR TEAMS : ARM OUR TEAMS TO BETTER FORWARD ROUNDUP MESSAGES TO CUSTOMERS AND STAKEHOLDERS

- Target : regional teams
- Message : all Roundup and gly messages (utility, safety, env. et GP)
- Actions
  - 2008 commercial launch focused on Roundup to help forwarding messages at distributors launches – Fall 08
  - UIPP training for regional teams (inter-companies) - 09
  - Monsanto EMEA communication training (RR) for France employees – 09/10
- Some tools
  - « All ambassadors » UIPP training shaped for regions
  - Monsanto CA EMEA training (RR part)
  - All Q&A about Roundup
  - Reassuring Roundup brochure (utility, safety, environment) - Oct 08
  - e-learning
  - internal event and meetings (cf infra)

SMOGER DECLARATION

EXHIBIT A3

IARC FOLLOW UP DEMONSTRATE SAFETY OF GLYPHOSATE

IARC FOLLOW UP

Demonstrate Safety of Glyphosate

Goals:

1. WHO Retraction/Clarification/Minimization: Lowry/Dykes
    a. Make sure determination doesn't get more widely adopted within WHO
    b. Prevent spread to WTO/SPS
    c. Prevent future bad IARC decisions on pesticides/GMOs
    d. Invalidate relevance of IARC

2. Protect Regulatory FTO: Miller/Vaughn/Dykes/Stater
    a. Re-registration
    b. No bans/restrictions (national; state; local)
    c. Prop 65
    d. SDS Revisions
    e. International requirements (if any) managed
    f. Maintain current MRLs; manage any increased testing

3. Litigation prevention/defense: McClain

4. Protect Sales Globally: Christiansen/Calvo
    a. No Restrictions – help monitor FTO risks and coordinate with regulatory
    b. Maintain demand for products

Work Products:

1) Comparison of studies cited by IARC v. available studies. (Available now)
    - Can be used now but of limited utility because we know they considered more studies than they cited in Lancet

2) Comparison of studies considered by IARC v. available studies. (Donna Farmer working on this)
    - Embargoed until monograph published

3) Explanation of what good scientific risk assessment would look like (combines hazard v. risk concept along with need to consider all available evidence, weight of evidence etc.). (Bill Heydens working on this).

4) Assessment of Available Experts
    - Supportive of glyphosate (which to use in what role)
    - Know what experts likely to speak out against

5) Complilation of 3RD Party Statements in defense of glyphosate
    - EPA
    - Germany

6) Assessment of options for convening independent scientific panel and pros/cons. (Vaughn)

7) General Safety of Glyphosate – explanation of the types of assessments done beyond carcinogenicity and how

"safe" glyphosate is. Only potential issue is reversible eye and skin irritation of formulations. (Donna Farmer working on this).

SMOGER DECLARATION

EXHIBIT A4

EMAIL RE: IARC RESPONSE MANUSCRIPT – IARC PLANNING

Message

From: SALTMIRAS, DAVID A [AG/1000] [/O=MONSANTO/OU=NA-1000-01/CN=RECIPIENTS/CN=DASALT]
Sent: 2/19/2015 11:35:16 PM
To: HEYDENS, WILLIAM F [AG/1000] [/O=MONSANTO/OU=NA-1000-01/cn=Recipients/cn=230737]
Subject: Re: IARC Planning

... And it is an IARC category 1

Sent from my iPhone

On Feb 19, 2015, at 5:31 PM, "HEYDENS, WILLIAM F [AG/1000]" <william.f.heydens@monsanto.com> wrote:
David,

Thanks for the update/feedback from Roger. If he ultimately doesn't want to run it in CRT, I'm sure we can find some journal to take it.

Btw, I looked at the butadiene paper – it was 108 pages long!! I don't think we need (or want) to do anything that big. Butadiene had lots of stuff going on that glyphosate doesn't.

Bill

From: SALTMIRAS, DAVID A [AG/1000]
Sent: Thursday, February 19, 2015 4:01 PM
To: HEYDENS, WILLIAM F [AG/1000]; FARMER, DONNA R [AG/1000]
Cc: KOCH, MICHAEL S [AG/1000]; HODGE-BELL, KIMBERLY C [AG/1000]
Subject: RE: IARC Planning

Bill et al.,

I had an extended chat with Roger this afternoon, as is the custom. He said that Critical Reviews has already dedicated some significant space to the glyphosate topic, especially the pending issue #3 with both the carc paper & Kier paper. However, to the contrary, he did say he'd consider something along the lines of the 1, 3 – butadiene issue... I think we would have to prepare a very compelling story.

David Saltmiras, Ph.D., D.A.B.T.
Science Fellow
Novel Chemistry and Microbials Product Lead
Toxicology and Nutrition Center
Monsanto
ph (314) 694-8856

> **From:** HEYDENS, WILLIAM F [AG/1000]
> **Sent:** Thursday, February 19, 2015 7:53 AM
> **To:** FARMER, DONNA R [AG/1000]
> **Cc:** KOCH, MICHAEL S [AG/1000]; SALTMIRAS, DAVID A [AG/1000]; HODGE-BELL, KIMBERLY C [AG/1000]
> **Subject:** RE: IARC Planning

Donna,

Per our phone call with John the other day, the next two most important things that we need to do are the Meta-analysis publication and the Ag Health Study Follow-up publication, assuming we can get our hands on the data in a reasonable timeframe. I feel confident that we will have organizational support for doing these projects, so I think we need to start setting them up now.

For the meta-analysis, please contact Elizabeth, let her know we would like her/Ellen to do this, and get a cost estimate from her.

For the AHS data, I heard 2 action items during our call: first - get with the lawyers to initiate the FOI process; second - contact Tom Sorohan and get him lined up to do the analysis when we get the data; also, get a cost estimate from him.

For the overall plausibility paper that we discussed with John (where he gave the butadiene example), I'm still having a little trouble wrapping my mind around that. If we went full-bore, involving experts from all the major areas (Epi, Tox, Genetox, MOA, Exposure - not sure who we'd get), we could be pushing $250K or maybe even more. A less expensive/more palatable approach might be to involve experts only for the areas of contention, epidemiology and possibly MOA (depending on what comes out of the IARC meeting), and we ghost-write the Exposure Tox & Genetox sections. An option would be to add Greim and Kier or Kirkland to have their names on the publication, but we would be keeping the cost down by us doing the writing and they would just edit & sign their names so to speak. Recall that is how we handled Williams Kroes & Munro, 2000.

One thing we could do now on this is to contact Roger McClellan at CRC and see if they would be amenable to putting this publication in *Crit. Rev. Toxicol.* John said he knew that Roger had done such a publication in the past. David, since you have worked with Roger on the other papers, would you be willing to contact him to judge his willingness to publish such a paper?

Any other thoughts welcomed.

Bill

From: HEYDENS, WILLIAM F [AG/1000]
Sent: Tuesday, February 17, 2015 4:53 PM
To: KOCH, MICHAEL S [AG/1000]; FARMER, DONNA R [AG/1000]; SALTMIRAS, DAVID A [AG/1000]; GARNETT, RICHARD P [AG/5040]; GUSTIN, CHRISTOPHE [AG/5040]; LISTELLO, JENNIFER J [AG/1000]
Cc: HEYDENS, WILLIAM F [AG/1000]
Subject: IARC Planning

All,

Attached is an updated spreadsheet for our IARC preparations.

Please let me know if you have any additions/corrections. Ongoing Activities are indicated by light blue fill color.

We did not have our IARC Planning meeting Monday due to the site being closed. However, Donna and I had a phone conference with John Acquavella today, and this resulted in several additions which are on page 4 of the attached Work Plan document.

Please let me know if you have other ideas or comments.

Thanks.

Bill

EXHIBIT B

DECLARATION OF STEPHEN J. HERMAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	*	MDL No. 2741
	*	Case No. 3:16-md-02741-VC
This Document Relates to:	*	**DECLARATION OF STEPHEN J. HERMAN**
Ramirez, et al. v. Monsanto Co., Case No. 3:19-cv-02224	*	

****

I, the undersigned,

STEPHEN J. HERMAN

respectfully declare, under penalty of perjury, that the following are true and correct to the best of my knowledge, information, recollection, and belief:

1. I practice law in New Orleans, Louisiana, and was appointed to serve as Co-Liaison Counsel for Plaintiffs in MDL No. 2179 as well as Co-Lead Class Counsel with respect to the Class Settlements with BP. This Declaration is offered to provide the Court with information, insight and opinions regarding the differences between the Proposed Class Settlement in the above-captioned matter and the *Deepwater Horizon* Medical Benefits Class Action Settlement.

Background and Qualifications

2. I am licensed to practice law in the State of Louisiana, the United States District Courts for the Middle, Eastern and Western Districts of Louisiana, the U.S. Fifth Circuit, Second Circuit, Ninth Circuit, and Eleventh Circuit Courts of Appeal, and the U.S. Supreme Court.

3. I am a partner in the law firm of Herman Herman & Katz, LLC.

4. Over the past 25 years, I have represented plaintiffs, defendants, and objectors in putative class actions, certified class actions, and class settlements.

5. I have, since 2005, taught an advanced torts seminar on class actions at Loyola University of New Orleans Law School, and have, for a number of years, also taught the advanced civil procedure course on complex litigation at Tulane University School of Law.

6. I have authored and presented a number of articles, papers and speeches on class actions, MDLs, and complex litigation, as well as general civil litigation, legal ethics and professionalism, and attorneys' fees.

7. I was, as previously noted, appointed to serve as Plaintiffs' Co-Liaison Counsel in the *Deepwater Horizon* MDL, No. 2179;[1] Co-Lead Class Counsel for the BP Economic and Medical Settlement Classes;[2] and Lead Settlement Class Counsel for the Halliburton/Transocean Settlement Classes.[3]

8. I was personally involved in the negotiation, approval and implementation of the *Deepwater Horizon* Medical Benefits Class Action Settlement.[4]

9. A complete resume is attached hereto and incorporated herewith.

10. My firm represents a number of plaintiffs with claims against Monsanto arising out of exposure to glyphosate. However, I believe that all of these clients retained our firm and/or co-counsel prior to February 3, 2021, and would therefore not seem to be affected by approval of the Proposed Settlement.

11. I am not being compensated for the preparation or submission of this Declaration.

The BP Medical Class Settlement

12. The BP Medical Benefits Settlement was intended, first and foremost, to **(i)** provide direct compensation to those who, due to exposure to oil and/or dispersants during the clean-up / response efforts, had experienced acute reactions, and in some cases developed lingering chronic conditions resulting therefrom,[5] and **(ii)** provide all clean-up workers with long-term monitoring for the early detection of more serious longer latency illnesses or disease.[6]

13. Due to a lack of medical infrastructure in many of the low-lying and coastal areas that were most directly affected by the spill, the parties also decided to develop and fund a series of grants, to be administered by and thru the state and other major hospitals in the area, to

---

[1] PRE-TRIAL ORDER NO. 6, *In re: Deepwater Horizon,* MDL No. 2179, Eastern District of Louisiana, Case No. 2:10-md-02179, Rec. Doc. 110 (Aug. 27, 2010).

[2] PRELIMINARY APPROVAL ORDER (Economic), *Deepwater Horizon,* Rec. Doc. 6418 (May 2, 2012) at ¶19, *and,* PRELIMINARY APPROVAL ORDER (Medical), *Deepwater Horizon,* Rec. Doc. 6419 (May 2, 2012) at ¶18(a).

[3] PRELIMINARY APPROVAL ORDER (HESI/Transocean), *Deepwater Horizon,* Rec. Doc. 16183 (April 12, 2016) at ¶16.

[4] *See generally,* DECLARATION OF STEPHEN J. HERMAN, *Deepwater Horizon,* Rec. Doc. 7116-2, at 89-93 (signed July 23, 2012) (filed Aug. 14, 2012), *and,* DECLARATION OF STEPHEN J. HERMAN AND JAMES PARKERSON ROY, *Deepwater Horizon,* Rec. Doc. 21098-1 (signed July 14, 2016) (filed July 21, 2016) at ¶¶ 63-67, 83-86.

[5] All of the Specified Physical Conditions, whether Acute or Chronic, were required to have first manifested within 24, 48, or 72 hours of exposure. *See* EXHIBIT 8 to the BP Medical Benefits Settlement (Specified Physical Conditions Matrix) [Rec. Doc. 6273-10].

[6] As ultimately developed, the Periodic Medical Consultation Program is not a traditional "medical monitoring" program, but provides more general access to basic medical services, without charge, to participating class members, over a period of 21 years. *See* Deepwater Horizon, 295 F.R.D. 112, 122-123 (E.D. La. 2013).

ensure that such settlement-related medical surveillance, as well as more general services, would be available to the class members and their communities.[7]

14. Finally, with the recognition that some class members would likely later develop more serious long-latency illnesses or diseases arguably related to the spill, the parties agreed that such class members would have to retain the right to pursue such future claims, the class settlement notwithstanding. Hence, the class members were also provided with a Back-End Litigation Option.[8]

15. When class counsel agreed to structure the BP Medical Benefits Settlement as a proposed class settlement, we knew that we were likely testing the limits of what could be accomplished within the bounds of Rule 23(b)(3).

16. As acknowledged by Professor Coffee at the time, the certification of a class action covering personal injuries, even in the settlement context, poses special legal problems.[9]

17. In overview, the BP Medical Benefits Settlement was designed to "provide compensation for acute and chronic physical conditions that are likely to arise from short-term exposure to oil, oil dispersants, or, in certain limited cases, to heat," while "more serious and more idiosyncratic injuries that might be caused by trauma, exposure or toxic reactions – *e.g.,* heart attacks, strokes, cancer, broken bones – are deliberately not compensated in order both (1) to create a cohesive class whose members have similar injuries (in terms of both the directness of their causation and their market value as legal claims) and (2) to define a class in which the causation is straightforward."[10]

---

[7] This Gulf Region Health Outreach Program is described more fully in Deepwater Horizon, 295 F.R.D. at 123-124.

[8] The Back-End Litigation Option process is set forth in Section VIII of the BP MEDICAL SETTLEMENT AGREEMENT [Rec. Doc. 6273-1] at pp.56-69, and summarized by the Court as follows: "The Parties have stipulated that in a lawsuit brought under the Back–End Litigation Option, the Class Member need not prove and may not litigate at trial: (a) the fact of exposure of the Class Member to oil and/or dispersants during the *Deepwater Horizon* Incident or Response Activities; (b) the alleged fault of BP for the Deepwater Horizon Incident; and (c) the fact and/or existence of the Agreement to prove liability. BP has also agreed to forego defenses based on prescription, statute of limitations or repose, laches, and certain other defenses. As a result, the only issues to be litigated under the Back–End Litigation Option are: (a) the fact of diagnosis; (b) the amount, location, and timing of oil and/or dispersants released and/or used during the *Deepwater Horizon* Incident or Response Activities; (c) the level and duration of the Class Member's exposure; (d) causation, including potential alternative causes; and (e) the amount, if any, of compensatory damages." Deepwater Horizon, 295 F.R.D. at 124-125.

[9] DECLARATION OF JOHN C. COFFEE, JR., *Deepwater Horizon,* Rec. Doc. 7113-2 (signed Aug. 10, 2012) (filed Aug. 13, 2012) at ¶3; *see also, e.g.,* DECLARATION OF ROBERT H. KLONOFF, *Deepwater Horizon,* Rec. Doc. 7116-2 at p.6, ¶14 ("under established law, mass tort personal injury cases are ordinarily not suitable candidates for class certification").

[10] COFFEE DECLARATION, *Deepwater Horizon,* Rec. Doc. 7113-2, at ¶2. *See also,* KLONOFF DECLARATION, *Deepwater Horizon,* Rec. Doc. 7116-2, at ¶46 ("the narrow and precise class definition limits the scope of the class to those most likely exposed to oil or oil-dispersing chemicals.… [G]iven that the injuries must have manifested themselves within 24 to 72 hours after exposure, that the injuries could have been caused through only two pathways, and that the class includes only those most likely to have been exposed to oil or petroleum-based dispersants, the likelihood of serious competing causation arguments is remote.… Because the class includes only individuals who were in close geographic and temporal proximity to the spill, a class member who shows that he or she suffers from a specified medical condition that manifested itself (or worsened) following the oil spill should not have serious trouble proving individual causation").

18. Against the existing "backdrop of greater obstacles to the certification of a mass tort settlement class action," Professor Coffee opined that the BP Medical Benefits Class Settlement could nevertheless be approved, ***because***:

    a. Variations in state law were not an issue;

    b. BP was a classic "single-event" disaster, which "avoids the difficulties in other mass tort class actions that have involved extended exposure, long latency periods, and greater uncertainty as to causation";

    c. ...

    d. The BP medical claims for acute and chronic injuries covered by the settlement were largely "negative value" claims; and,

    e. The chain of causation for the conditions and injuries covered by the BP settlement was "straightforward" …. [11]

19. Despite the availability of a Back-End Litigation Option for BP Medical Settlement Class Members, the parties were cognizant of the Supreme Court's concern about the ability to provide class members with meaningful notice, particularly with respect to the potential impacts of a proposed class settlement on future claims.[12]

20. The BP Medical Class Definition was therefore tightly drawn to include only **(a)** Clean-Up Workers, and **(b)** coastline residents within geographically limited and well-defined zones.[13]

---

[11] COFFEE DECLARATION, *Deepwater Horizon,* Rec. Doc. 7113-2, at ¶9. *See also,* KLONOFF DECLARATION, *Deepwater Horizon,* Rec. Doc. 7116-2, at ¶15 (summarizing the elements that make the BP Medical Class Settlement "truly an exception to the general rule that mass tort personal injury cases should not be certified").

[12] *See* Amchem v. Windsor, 521 U.S. 591, 628 (1997) ("Impediments to the provision of adequate notice, the Third Circuit emphasized, rendered highly problematic any endeavor to tie to a settlement class persons with no perceptible asbestos-related disease at the time of the settlement…. Many persons in the exposure-only category, the Court of Appeals stressed, may not even know of their exposure, or realize the extent of the harm they may incur. Even if they fully appreciate the significance of class notice, those without current afflictions may not have the information or foresight needed to decide, intelligently, whether to stay in or opt out"; although "we need not rule, definitively, on the notice given here … we recognize the gravity of the question whether class action notice sufficient under the Constitution and Rule 23 could ever be given to legions so unselfconscious and amorphous").

[13] *See DEEPWATER HORIZON* MEDICAL BENEFITS CLASS SETTLEMENT AGREEMENT, *Deepwater Horizon,* Rec. Doc. 6273-1 (April 18, 2012) at ¶¶ I(A) (Class Definition), II(Q) (Definition of Clean-Up Worker), Exhibit 9 [Rec. Doc. 6273-11] (Zone A and B Geographical Descriptions), Exhibit 10 [Rec. Doc. 6273-12] (Zone A Maps), and Exhibit 11 [Rec. Doc. 6273-13] (Zone B Maps).

21. Most, if not all, of the BP Medical Settlement Class Members were objectively ascertainable and individually identifiable for notice purposes from property ownership records and one or more of the clean-up/response databases.[14]

22. While BP Medical Class Members pursuing Back-End Litigation Option lawsuits are subject to pre-suit notice, discovery, and mediation requirements, there are no individual or aggregate limitations on the compensatory damages available to such class members; nor is there any other aggregate limitation or cap on the settlement funds available for Specified Medical Condition payments, the Periodic Medical Consultation Program, or the costs of settlement administration.[15]

23. In approving the BP Medical Class Settlement, the Court underscored that: "The claims of each of the Medical Class Members arise out of a single event – the Macondo well blowout, the resulting oil spill, and the Response thereto."[16]

24. It is "limited to individuals who suffered past exposure to oil and/or dispersants during a well-defined, finite time period" and "is based upon objective criteria, including participation in Response Activities, residency in objectively-defined geographic areas, and the manifestation of clearly-identified Specified Physical Conditions."[17]

25. As distinguished from *Amchem,*[18] the BP Medical Benefits Class "consists exclusively of individuals who have suffered a past exposure and, by definition, an injury. All Class Members retain the right to sue for Later–Manifested Physical Conditions under the Back–End Litigation Option. There is thus no 'future' injury released by the Settlement."[19]

---

[14] *See, e.g.,* BP MEDICAL BENEFITS SETTLEMENT AGREEMENT, at ¶ XXI(B)(1) (identifying the "Badged Workers" database, "Medical Encounters" database, "Training" database, "Traction" database, "Injury and Illness" database, "Persons on Board" lists); *see also,* XI(B)(2) ("Individual mailed notification to those Medical Benefits Settlement Class Members who can practicably be identified from Court filings and records; GCCF records; databases, data files, data collections, and other documentary evidence in the possession, custody, or control of BP; names and addresses of known residents who resided in ZONE B; and other sources, pursuant to the Court-approved Medical Benefits Class Notice Plan").

[15] In addition, the Class Counsel and other Common Benefit Attorney Costs and Fees were paid by BP over and above the compensation and other settlement benefits flowing to the BP Medical Class Members. *See* BP MEDICAL BENEFITS SETTLEMENT AGREEMENT, ¶ XIX, *and,* EXHIBIT 19 [Rec. Doc. 6273-21]; (*see* Deepwater Horizon, 295 F.R.D. at 126 ("Any common benefit Class Counsel fees and costs awarded by the Court will not be deducted from Class Members' recoveries, but will be paid by BP in addition to other class benefits")).

[16] Deepwater Horizon, 295 F.R.D. at 141.

[17] Deepwater Horizon, 295 F.R.D. at 133.

[18] *See* Amchem, 521 U.S. at 626, where "for the currently injured, the critical goal is generous immediate payments," whereas exposure-only plaintiffs, by contrast, had an interest "in ensuring an ample, inflation-protected fund for the future."

[19] Deepwater Horizon, 295 F.R.D. at 140.

Important Differences Between the BP Medical Class Settlement and the Proposed Class Settlement in This Case

26. There are important differences between the BP Medical Class Settlement and the Proposed Class Settlement in the above-captioned case, including particularly:

    a. BP was a "single event" case;

    b. All of the relevant exposure had already occurred;

    c. The class members could be specifically identified and provided with individualized notice;

    d. All of the claims were governed by general maritime law;

    e. The BP Medical Class Members were entitled to ***both*** immediate compensation from the settlement program for acute and chronic conditions ***and also*** the ability to come back and sue BP in the future in the event of a later-manifested physical condition or disease; and,

    f. The potential future claims for punitive damages that were released in the Back-End Litigation Option process were uncertain and legally challenging.

27. These distinctions, in my opinion, are significant in terms of the Rule 23(a) and (b)(3) requirements for certification, even (and in some cases especially) in the settlement context.

28. While perhaps not as "sprawling" as the class settlement proposed in *Amchem,* this Proposed Class Settlement does attempt to encompass the claims of literally millions of people who have been exposed to different glyphosate products, "for different amounts of time, in different ways, and over different periods."[20]

[20] *See* Amchem, 521 U.S. at 624 (quoting Georgine v. Amchem Products, 83 F.3d 610, 626 (3d Cir. 1996)). Under this Proposed Class Settlement, the products include: Roundup; Accord; AFG; Agent; Agrivalu; Albaugh; Aquamaster; Aquaneat; Backdraft; Bronco; Buccaneer; Chemsico; Clean Clearout; Cornerstone; Corral; Credit; Custom; Dog Fight; Doomsday; Drexel; DuPont; Dynasty; Eagre; Ecoplug Implant; Edger II; Erase Blue; Esplanade; ETK-2301; Exchange; Expedite; Expert; Extreme; EZ-Ject; Fallow; Ferti-Lome; Foresters; Fozzate; GLY; GlyStar; Glyfos; Gly-Flo; Glygran; Glykamba; Glymix; Glyphosate; Glypho; Glyphomax; Glypro; Grass, Weed and Vegetation Herbicide; Green Light Com-Pleet; Green Light; GroundClear; Helosate; Honcho;Jury; Kleenup; Kleeraway; Kornerstone K; Kredit; Landmaster; LG; Lilly/Miller; LPI; Makaze Yield-Pro; Marman Atila; Martin's Eraser; Militia; Mirage; Mon; NAF; Nomix; NS; NSR; NuFarm; NUP; Ortho; Polado; Prep It; Prodeuce; Razor; Ranger; RD; Ready-to-Use; Recoil Broad Spectrum; Rigo; Riverdale Credit; Rodeo; RT; RT3; SC; Security Blot-Out; Shackle; Specticle; Super K-Gro; Surrender; Systemic; Takeout; Thundermaster; Tomahawk; Touchdown; TVC; Weed & Grass Killer; and ZPP. *See* EXHIBIT 1 to the Proposed Class Settlement Agreement [Rec. Doc. 12531-2 at pp.130-150]; PROPOSED CLASS NOTICE, No.9 (Exhibit 2 to the Proposed Settlement Agreement) [Rec. Doc. 12531-2 at p.161].

29. By the time the BP Medical Class Settlement was reached, the clean-up/response effort had long concluded, and virtually all if not all of the exposure by class members to oil and dispersants had already occurred. In this case, by contrast, the parties attempt to capture anyone who has been exposed to Roundup at any point prior to February 3, 2021,[21] even as the product remains on the market and additional exposure to Proposed Settlement Class Members may be ongoing or recurring.[22]

30. Even in *Amchem,* although the resulting conditions had long-latency periods, much if not all of the exposure to the proposed settlement class members had already occurred in the past.[23]

31. Here, by contrast, the class is confronted with ***both*** the manifestation of long-latency illness ***and*** continued exposure to the product long beyond the date of the settlement.

32. Consider, hypothetically, a 13-year-old girl who in 2020 helped her parents with the garden and was exposed to Roundup, and then goes on to work as a landscaper in her 20s and 30s (from 2027-2046), and is ultimately diagnosed with Non-Hodgkin's Lymphoma when she is 50 (in 2057): Are we going to say that the notice she purportedly received, or that her parents purportedly received, in 2021 is sufficient to curtail her future rights as a matter of Due Process?

---

[21] "Exposure" according to the Proposed Class Notice, means "that you were exposed when Roundup Products were mixed or applied, whether or not you were the person doing the mixing or application." *See* PROPOSED CLASS NOTICE, No.8. According to the Proposed Class Settlement Agreement: "'Exposure to Roundup Products through the application of Roundup Products' includes exposure through mixing and any other steps associated with application, whether or not the individual performed the application, mixing, or other steps associated with application himself or herself." PROPOSED CLASS SETTLEMENT AGREEMENT [Rec. Doc. 12531-2] §1.1(a).

[22] *See* PROPOSED CLASS SETTLEMENT AGREEMENT, §12.8 ("For the avoidance of doubt, if a Settlement Class Member is further exposed to Roundup Products on or after February 3, 2021, … the Releases… and the stay … shall apply to Claims arising from, resulting from, in any way relating to or in connection with such exposure to the same extent as Claims arising from, resulting from, in any way relating to or in connection with exposure prior to February 3, 2021").

[23] *See* Amchem, 521 U.S. at 598 (quoting REPORT OF THE JUDICIAL CONFERENCE AD HOC COMMITTEE ON ASBESTOS LITIGATION 2–3 (Mar. 1991) ("This is a tale of danger known in the 1930s, exposure inflicted upon millions of Americans in the 1940s and 1950s, injuries that began to take their toll in the 1960s, and a flood of lawsuits beginning in the 1970s")).

33. In the BP Medical Class Settlement, by contrast, notice was mailed to a discreet group of identifiable people, within a limited geographical region, who already knew whether they had been exposed to oil and/or dispersants and whether they had thereafter suffered from acute or chronic injuries.[24]

34. Also potentially significant is the fact that the BP medical claims were all governed by a single uniform body of general maritime law.[25] While I personally do not believe that variations in state law are relevant in the settlement context,[26] courts have sometimes disagreed.[27] The Proposed Settlement Class here would seem to implicate the substantive

---

[24] *See* FOOTNOTES 13 and 14 *supra*. *See also, e.g.,* Deepwater Horizon, 295 F.R.D. at 134 ("The Medical Class includes approximately 90,000 Clean–Up Workers and nearly 5,000 Zone B Residents. Approximately 100,000 individuals reside in Zone A"); DECLARATION OF CAMERON AZARI, *Deepwater Horizon,* Rec. Doc. 7113-1 (Aug. 13, 2012), at ¶¶19-33 (explaining how, utilizing information from the BP clean-up and response databases and geographical mapping, Hilsoft was able to provide individual notice to 274,294 potential Medical Benefits Settlement Class Members by mail and 56,136 by e-mail, as well as 64,798 to known attorneys or other representatives of potential Medical Benefits Settlement Class Members, and to 483 entities that were known to have participated in the Response Activities, with only a 3.3% undeliverable rate).

[25] *See* In re Deepwater Horizon, No.10-2179, 2011 WL 4575696 at **2-3 (E.D.La. Oct. 4, 2011) (medical claims governed by maritime law, to the exclusion of state law) (citing In re Deepwater Horizon, 808 F.Supp.2d 943, 951-958 (E.D.La. Aug. 26, 2011)).

[26] At least for Rule 23(b)(3) purposes. *See, e.g.,* Amchem, 521 U.S. at 620 ("Confronted with a request for settlement-only class certification, a district court need not inquire whether the case, if tried, would present intractable management problems…, for the proposal is that there be no trial"). There might be some circumstances in which the variations in substantive law between and among the proposed classmembers are so significant that Rule 23(a)(4) adequacy of representation concerns would arguably suggest the need for procedural safeguards such as the appointment of a neutral for internal allocation purposes or formal sub-classing.

[27] *See, e.g.,* In re Hyundai and Kia Fuel Economy Lit., 881 F.3d 679 (9th Cir. 2018) (reversing national class settlement on the basis that the district court failed to adequately consider variations in state law). While the Ninth Circuit, sitting *en banc,* vacated this original panel decision, such reversal seems predicated largely on the Court's determination in that case that the substantive law of California could be applied to the entire class. *See* In re Hyundai and Kia Fuel Economy Lit., 926 F.3d 539, 561-562 (9th Cir. 2019) (en banc). The Court, at the same time, does state that: "Importantly, the *Mazza* class was certified for litigation purposes. The prospect of having to apply the separate laws of dozens of jurisdictions presented a significant issue for trial manageability, weighing against a predominance finding. *See also Zinser v. Accufix,* 253 F.3d at 1190–1192 (treating state law variations as a subspecies of trial manageability concerns). In settlement cases, such as the one at hand, the district court need not consider trial manageability issues. *Amchem,* 521 U.S. at 620." Hyundai and Kia Fuel Economy Lit., 926 F.3d at 563 (citing Mazza v. American Honda Motor Co., 666 F.3d 581, 590-594 (9th Cir. 2012) (national certification of litigation class vacated and remanded based on the finding that each class member's consumer protection claim should be governed by the consumer protection laws of the jurisdiction in which the transaction took place), and Zinser v. Accufix Reasearch Institute, 253 F.3d 1180, 1189 (9th Cir. 2000) ("Where the applicable law derives from the law of the 50 states, as opposed to a unitary federal cause of action, differences in state law will compound the disparities among class members from the different states")). In the Ninth Circuit, therefore, the presence of variations in state law may not be significant when a class is sought to be certified for settlement purposes only. *See* Jabbari v. Farmer, 965 F.3d 1001, 1007 (9th Cir. 2020) ("*Hyundai* thus dictates that, as a general rule, a district court does not commit legal error by not conducting a choice-of-law analysis, despite variations in state law, before determining that common issues predominate for a settlement class…. For purposes of a settlement class, differences in state law do not necessarily, or even often, make a class unmanageable"). *But see*: Amchem, 521 U.S. at 624 (quoting the Third Circuit, with apparent approval, to the effect that: "Differences in state law … compound these disparities").

law of all 50 States – and arguably the laws of other nations.[28] Although perhaps in and of itself insufficient to preclude certification of the Proposed Class for settlement purposes, the variations in substantive law, combined with other factors, would seem material to the Rule 23(b)(3) analysis.[29]

35. In the BP Medical Class Settlement, moreover, the BP Medical Class Member was entitled to receive compensation under the Specified Medical Condition Matrix, ***and then also*** come back later to pursue a Back-End Litigation Option lawsuit in the event of a later-manifested physical condition.[30]

36. It appears that under this Proposed Class Settlement, by contrast, the Proposed Settlement Class Member can only receive ***either*** compensation under the settlement matrix ***or*** an accelerated payment award of $5,000 ***or*** compensatory damages that may be awarded in a conventional lawsuit.[31] A Proposed Settlement Class Member does not seem to have the ability to seek additional compensation – either within the class settlement program or in litigation – for a later manifested physical condition.

37. Superficially, BP Medical Class Members, like the Roundup Proposed Settlement Class Members, gave up their right to assert claims for punitive damages in the event of a later-manifested physical conduction. However, at the time the BP Medical Settlement was entered, such claims were uncertain and legally challenging. The MDL Court had already dismissed the punitive damages claims of Jones Act seamen class members involved in the clean-up / response efforts, as a matter of law.[32] The remaining BP Medical Settlement Class Members would have been required, at trial, under U.S. Fifth Circuit precedent, to not only demonstrate egregious conduct, but to also prove that such willful, wanton, or reckless conduct "emanated from corporate policy or that a corporate official with policy-making authority participated in, approved of, or subsequently ratified the egregious conduct."[33] Indeed, after a full liability trial on the merits, the Court would ultimately conclude that, while there was willful, wanton and reckless conduct on the part of BP

---

[28] The Proposed Class Definition attempts to capture not only residents and citizens of the United States, but also those individuals "who claim exposure to Roundup Products through the application of Roundup Products in the United States."

[29] *See, e.g.,* Amchem, supra, 521 U.S. at 624 (quoting the Third Circuit, with apparent approval, in addressing the predominance issues: "Differences in state law … compound these disparities").

[30] *See* FOOTNOTE 47 *infra,* relating observations from the Klonoff Declaration that was submitted in *Deepwater Horizon.*

[31] *See* PROPOSED CLASS NOTICE, Nos.14, 49-51 (Exhibit 2 to the Proposed Settlement Agreement) [Rec. Doc. 12531-2 at pp.162-163, 170-171]. *See also* PROPOSED CLASS SETTLEMENT AGREEMENT, §6.1(b) (One Award Per Settlement Class Member), §6.2(a)(i)(3) (Release of Claims), §6.2(a)(ii)(5) (Release of Claims), and §17.2 (Release of Unknown Claims).

[32] *See* Deepwater Horizon, 2011 WL 4575696 at *11.

[33] In re Deepwater Horizon, 21 F.Supp.3d 657, 749 (E.D.La. 2013); *citing,* In re: P & E Boat Rentals, Inc., 872 F.2d 642, 652-653 (5th Cir.1989).

employees acting in a "managerial" capacity, this was insufficient to visit punitive damages exposure on the company.[34]

38. In the Roundup Litigation, by contrast, it is my understanding that all three trials have resulted in substantial punitive damages verdicts.[35]

39. Therefore, the hopeful and somewhat theoretical claims for punitive damages that were given up by the settling BP Medical Class Members are not analogous, in my opinion, to the proposed-to-be-released Roundup-related punitive damages claims.

40. Finally, it is worth noting that in a BP Back-End Litigation Option lawsuit, the BP Medical Class Member is relieved from having to prove either that he or she was exposed to oil and/or dispersants, or that BP is at fault.[36]

41. In this case, by contrast, if a Proposed Class Member elects to file a conventional lawsuit for compensatory damages, Monsanto appears to retain the right to contest both exposure and liability, in addition to specific causation – separate and apart from Monsanto's ability to utilize and/or contest the Science Panel's general causation determinations.[37]

Other Observations About the Proposed Class Settlement

42. An asymptomatic Proposed Settlement Class Member is arguably required to register within 45 days of the conclusion of the initial settlement period in order to receive future settlement compensation under the matrix if and when Non-Hodgkin's Lymphoma might

---

[34] Deepwater Horizon, 21 F.Supp.3d at 746-751.

[35] *See, e.g.,* MEMORANDUM IN SUPPORT OF PRELIMINARY APPROVAL, *In re Roundup Products Liability Litigation,* MDL No. 2741, Rec. Doc. 12509 (Feb. 3, 2021) at pp.49-50 fn.13 (punitive damage verdict of $75 million, reduced to $20 million, in *Hardeman v. Monsanto Co.,* No.16-525 (N.D. Cal.); punitive damages verdict of $250 million, reduced to $10.3 million, in *Johnson v. Monsanto,* 52 Cal. App.5th 434 (Cal. App. 1st Dist. 2020); and punitive damages verdicts of $1 billion to each of two plaintiffs, reduced to $24.5 million and $44.8 million, in *Pilliod v. Monsanto Co.,* No.RG17862702 (Cal. Super.)).

[36] *See* FOOTNOTE 8 *supra.*

[37] *See* PROPOSED CLASS SETTLEMENT AGREEMENT, at ¶12.7(i) and ¶30.2 ("The Monsanto Parties do not waive or concede any position or arguments they have for or against, and retain full right and ability to contest, a Settlement Class Member's claim of exposure to Roundup Products or whether an individual is a Settlement Class Member in any action or proceeding, including any Roundup Lawsuit, Related Party Lawsuit, and/or with respect to any and all Roundup Claims. The Monsanto Parties and the Related Parties will not be precluded in any action or proceeding from contesting a Settlement Class Member's claim of exposure to Roundup Products or whether an individual is a Settlement Class Member, even if the Settlement Class Member receives a favorable Notice of Registration Determination, Accelerated Payment Determination, or Claims Program Determination"); *see also* MEMO IN SUPPORT OF PRELIMINARY APPROVAL, at p.18 ("either class members or Monsanto may introduce or challenge the determination in individual cases, and either may introduce supplemental or conflicting evidence on causation. In addition, if new scientific evidence emerges three years or more after the Panel reaches its determination, any party may challenge the admissibility of the Panel's determination under *Daubert/Frye* on that basis").

develop[38] - assuming that Monsanto agrees, and the Court approves, a continuation and further funding.[39]

43. The Proposed Settlement Class appears to effectively shorten the statute of limitations for currently asymptomatic Proposed Settlement Class Members to only 180 days following an Non-Hodgkin's Lymphoma diagnosis[40] - at least with respect to settlement matrix compensation claims.[41] (In BP, by contrast, a Medical Settlement Class Member has four years from the date of diagnosis to initiate a Back-End Litigation Option claim.[42])

44. It is not clear the extent to which a Proposed Settlement Class Member retains his or her right to sue Monsanto for compensatory damages if he or she is denied settlement matrix compensation or the fund runs out of money and Monsanto refuses to extend (or the Court refuses to approve continuation of) the settlement program. The answer to Question No. 49 in the Proposed Settlement Class Notice suggests that such rights will be retained.[43] But the answer to Question No. 40 advises that: "if you stay in the class, you can only bring an individual lawsuit against Monsanto for your exposure to Roundup Products after the Science Panel completes its work, and then only if you were offered a compensation award and did not accept it, or you did not apply for a compensation award."[44]

45. What if I am a Proposed Settlement Class Member, and I am diagnosed in the next three years with Non-Hodgkin's Lymphoma, and I expend the time and effort to submit a settlement compensation claim, which is accepted, but the Compensation Fund is exhausted and not extended: I have to then file a conventional lawsuit, wherein Monsanto can use an adverse Science Panel determination against me, and my claim will be limited to compensatory damages only? [45]

---

[38] *See* PROPOSED CLASS NOTICE, No.20 (Exhibit 2 to the Proposed Settlement Agreement) [Rec. Doc. 12531-2 at p.164]

[39] *See* PROPOSED CLASS NOTICE, No.25.

[40] PROPOSED CLASS NOTICE, No.20. The limitation period may, as a practical matter, turn out to be longer than 180 days for a Proposed Settlement Class Member who is diagnosed before the settlement becomes final.

[41] Presumably, a future lawsuit for compensatory damages would be governed by the ordinarily applicable statute of limitations. (*See* PROPOSED CLASS NOTICE, Nos. 49, 51)

[42] *See* BP MEDICAL SETTLEMENT AGREEMENT, §VIII(A).

[43] *See* Rec. Doc. 12531-2, at p.170.

[44] *See* Rec. Doc. 12531-2, at p.168.

[45] This would appear to be the case. *See* PROPOSED CLASS SETTLEMENT AGREEMENT, §6.4, §7.13(f), and §13.4(e). (In addition, it appears that if claim determination were made, but the Proposed Settlement Class Member never formally "accepted" the "offer" because the Compensation Fund has been exhausted, Monsanto would be able to use the plaintiff's unhonored settlement claim determination as an offer of judgment against them.)

46. While the exclusion of medical monitoring and punitive damages from the definition of "Compensatory Damages" seems clear, I am not sure how "any damages that were increased because of the absence of medical monitoring for any injuries"[46] would be quantified or determined(?)

47. This is not a "negative value" case.[47]

48. This Proposed Settlement strikes me as the "judicial blackmail" complaint[48] in reverse: Monsanto faces such daunting exposure from the prospect of future *individual* cases that the company seeks to now insulate itself through the protections of a settlement class.

49. But Rule 23(e) does not instruct the Court to consider whether the Proposed Settlement is fair and reasonable from the defendant's perspective; it only directs the Court to consider whether the Proposed Settlement is fair, reasonable and adequate ***to the members of the class***.[49]

---

[46] *See* PROPOSED CLASS SETTLEMENT AGREEMENT, §2.1(16) and §17.1(b).

[47] Putting aside claims for punitive damages, (*see* Footnote 35 *supra*), it is my understanding that compensatory damages of $5 million were awarded in *Hardeman*; that compensatory damages of $39.2 million, reduced to $4 million, were awarded in *Johnson*; and that compensatory damages of $55 million were awarded in *Pilliod.* Addressing the BP Medical Class Settlement, on the other hand, Dean Klonoff noted that: "in contrast to most attempted mass tort personal injury class actions, the medical claims in this case are, in the main, classic 'negative value' cases (*i.e.,* claims that are not economically viable as individual lawsuits because the likely recovery is less than the costs of bringing suit)" (citing *Amchem,* 521 U.S. at 617 (noting that the drafters of Rule 23(b)(3) "had dominantly in mind vindication of 'the rights of groups of people who individually would be without effective strength to bring their opponents into court at all'"); and further noting that the Specified Physical Conditions being claimed and compensated under the BP Medical Benefits Settlement were "relatively minor", while the "more serious injuries" which may take years to manifest "would be covered by the Back-End Litigation Option". DECLARATION OF ROBERT H. KLONOFF, *Deepwater Horizon,* Rec. Doc. 7116-2 at p.22, ¶45.

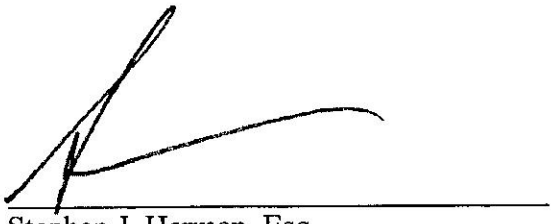
[48] ***But see***: Klay v. Humana, 382 F.3d 1241, 1274 (11th Cir. 2004) ("if their fears are truly justified, the defendants can blame no one but themselves. It would be unjust to allow corporations to engage in rampant and systematic wrongdoing, and then allow them to avoid a class action because the consequences of being held accountable for their misdeeds would be financially ruinous. We are courts of justice, and can give the defendants only that which they deserve").

[49] *See* FED. RULE CIV. PRO. 23(e)(2)(C) ("the relief provided for the class is adequate…"); *see also, e.g.,* FED. RULE CIV. PRO. 23(e)(2) ("If the proposal would bind class members, the court may approve it only … on finding that it is fair, reasonable, and adequate"); FED. RULE CIV. PRO. 23(e)(2)(A) ("the class representatives and class counsel have adequately represented the class"); FED. RULE CIV. PRO. 23(e)(2)(C)(2) ("the effectiveness of any proposed method of distributing relief to the class"); FED. RULE CIV. PRO. 23(e)(2)(D) ("the proposal treats class members equitably relative to each other"); *see also* MANUAL FOR COMPLEX LITIGATION (4th ed. 2004) §21.61 ("To determine whether a proposed settlement is fair, reasonable, and adequate, the court must examine whether the interests of the class are better served by settlement than by further litigation").

50. If Monsanto's fears about its exposure to future plaintiffs is justified, the company has no one to blame but itself. Indeed, it would be unjust, in my view, to allow a corporation like Monsanto to engage in rampant and systematic wrongdoing, and then allow it to avoid liability because the consequences of being held accountable at trial might be financially ruinous for the company. A court of justice can give a defendant like Monsanto only so much justice as it deserves.

I declare, under penalty of perjury, that the above and foregoing is true and correct to the best of my knowledge, information, and belief.

This 25th day February, 2021.



Stephen J. Herman, Esq.

STEPHEN J. HERMAN

820 O'Keefe Avenue
New Orleans, Louisiana 70113
Telephone: (504) 581-4892
Fax No. (504) 561-6024
E-Mail: sherman@hhklawfirm.com

PERSONAL

Born, in New Orleans, Louisiana, on November 22, 1968.
Married, in 1994, to the Honorable Karen Kirshbom Herman, Criminal District Court for the Parish of Orleans, Section I.
Children: Alexandra Rae Herman, 21, and Harris Andrew Herman, 18.

EDUCATION

Isidore Newman School — **New Orleans, LA**
Board of Regents Scholar, 1987.
National Merit Letter of Commendation, 1986.

Dartmouth College — **Hanover, NH**
Bachelor of Arts, 1991.
GPA, Overall: 3.3; Major (English): 3.6.
Third Honor Group, 1989-1990.
Citation of Excellence in the Study of Milton, 1990.
Citation of Excellence in the Study of Shakespeare, 1990.
Winner of the Elenor Frost Playwriting Competition, 1991.

Tulane University School of Law — **New Orleans, LA**
Juris Doctor, *Magna Cum Laude,* 1994.
GPA: 3.52; Class Rank: Top Ten Percent.
Order of the Coif.

EMPLOYMENT

Herman, Herman & Katz, L.L.C. — **New Orleans, LA**
Associate, 1995 - 2001.
Partner, 2002 -

Herman Gerel, L.L.P. — **Atlanta, GA**
Associate, 1999 - 2001.
Partner, 2002 -

Justice Harry T. Lemmon, Louisiana Supreme Court — **New Orleans, LA**
Judicial Clerk, 1994-1995.

Democratic Senatorial Campaign Committee — **Washington, DC**
Paid Intern, 1989.

ACADEMIC POSITIONS

Tulane University Law School — **New Orleans, LA**
Adjunct, Advanced Civil Procedure: Complex Litigation, 2009-2016.
Adjunct Associate Professor, 2017-2019.
Adjunct Professor of Law, 2020 -

Loyola University School of Law — **New Orleans, LA**
Adjunct Professor, Advanced Torts Seminar on Class Actions, 2005 -

PROFESSIONAL APPOINTMENTS

Louisiana Attorney Disciplinary Board
Hearing Committee Member, 4th and 5th Circuits, 2008-2010.
Lawyer Chairman, Hearing Committee 56, 2010 -2013.

Southeast Louisiana Legal Services, Board of Directors, 2009-2011

Louisiana State Law Institute, Code of Civil Procedure Committee, Sub-Committee on Multi-District Litigation, 2009.

Louisiana Attorney Fee Review Board, 2014-2015.

Louisiana Supreme Court Committee on Rules of Professional Conduct for Class Actions, Mass Torts and Complex Litigation, 2015-

LSBA Rules of Professional Conduct Committee, 2016 -

LSBA Receivership Panel, 2019 -

ADMISSIONS TO PRACTICE

State of Louisiana, Supreme Court and all inferior courts, 1994.

United States District Courts, Eastern, Western, and Middle Districts of Louisiana, 1995.

U.S. Fifth Circuit Court of Appeals, 1995.

U.S. Ninth Circuit Court of Appeals, 2004.

U.S. Second Circuit Court of Appeals, 2009.

U.S. Eleventh Circuit Court of Appeals, 2020.

U.S. Supreme Court, 2007.

BAR AND TRIAL ASSOCIATIONS

International Academy of Trial Lawyers.
Fellow, 2015 -

American Bar Association, 1994 -
Fellow, American Bar Foundation.
Member, Labor and Employment Section, 2004-2017.
Member, Tort Trial and Insurance Practice Section, 2014 -
Member, Litigation Section, 2015 -

American Association for Justice, (formerly ATLA), 1995 -
Executive Committee, 2011-2012.
Board of Governors, 2014 -
Harry Philo Award, 2018.
State Delegate, Louisiana, 2007-2013.
Chair, AAJ State Delegates, 2011-2012.
National College of Advocacy (NCA) Board of Trustees, 2011-2017, 2019 -
AAJ Endowment Board, 2010 -
Wiedemann-Wysocki Award, 2001, 2011.
Heavy Lifting Award, 2012.
Above and Beyond Award, 2019.
Legal Affairs Committee, 2016 -
Amicus Curiae Committee, 2008 -
Chair, 2019 -
"Fellow" - National College of Advocacy.
Co-Chair, Gulf Oil Spill Litigation Group, 2010 -
Co-Chair, Chinese Drywall Litigation Group, 2009 -2011.
Co-Chair, Dialysis Products Litigation Group, 2012.
ATLA Press Advisory Board, 1999-2002, 2007-2010.
Keyperson Committee, 1996 -
AAJ PAC Eagle / M-Club.
Leaders' Forum Member.
Constitutional Litigation Committee, 1997 -
Preemption Task Force, 2008 -
Rule 23 Working Group, 2014 -
30(b)(6) Working Group, 2017 -
MDL Working Group, 2018 -
Member, Commercial Law Section, 1996 -
Member, Insurance Law Section, 1996 -
Member, Product Liability Section, 2014 -
Member, Jury Bias Litigation Group, 2015 -
Member, Class Action Litigation Group, 2009 -
Member, Tobacco Litigation Group, 1996 -
Member, Health Care Finance Litigation Group, 1998 -
Member, Electronic Discovery Litigation Group, 2004 -

Louisiana State Bar Association, 1994 -
Fellow, Louisiana Bar Foundation.
Rules of Professional Conduct Committee, 2016 -
Receivership Panel, 2019 -
Cuba Task Force, 2016-2017.

BAR AND TRIAL ASSOCIATIONS (cont.)

Louisiana Association for Justice, (formerly LTLA), 1995 -
President, 2014-2015.
Stalwart Award, 2017.
Executive Committee, 2011-2017.
Amicus Curiae Committee, 1999 -
Chair, 2017 -
Chair, Maritime Section, 2012-2013.
Chair, Law Office Technology Section, 2006-2007.
Board of Governors, 2004-2017.
Council of Directors, 2006-2017.
AAJ State Delegate, 2007-2013.
President's Advisory Board, 1996-1997, 1999-2000.
Constitutional Litigation Committee, 1996 -
Key Contacts Committee, 1997 -
Speakers Bureau, 1999 -

Civil Justice Foundation.
President, 2003-2004.
Board of Trustees, 1999-2012.
President's Award, 2001.

Public Justice, (formerly TLPJ).
Executive Committee, 2015-2016, 2017-2018.
Board of Trustees, 2010 -
Membership Committee Co-Chair, 2008-2009.
Louisiana State Network Coordinator, 2000-2012.

Roscoe Pound Foundation (Pound Civil Justice Institute).
President, 2020 -
Board of Trustees, 2015 -

Litigation Counsel of America.
Senior Fellow, 2016 -
Fellow, 2007-2016.

Federal Bar Association, New Orleans Chapter.
Board of Trustees, 2018 -

Bar Association of the Fifth Federal Circuit.

New Orleans Bar Association.
Board of Trustees, 2018 -
Treasurer, 2020 -
Inn of Court, 2019 -

Mississippi Trial Lawyers Association.

Attorney Information Exchange Group (AIEG).

National Association of Legal Fee Analysis (NALFA).
Nation's Top Attorney Fee Experts: Assessing Fees in Class Actions, 2018.

Injury Board.

PUBLICATIONS

America and the Law: Challenges for the 21st Century, Austin & Winfield, 1998, (revised edition, Gravier House Press, 1999).

"Duties Owed by Appointed Counsel to MDL Litigants Whom They Do Not Formally Represent" Loyola Law Review, Vol. 64, p.1 (Spring 2018).

"Layers of Lawyers: Parsing the Complexities of Claimant Representation in Mass Tort MDLs," co-authored with Lynn A. Baker, Lewis & Clark Law Review, Vol.24, Issue No.2, p.469 (Spring 2020).

"HMO Litigation" Tort Litigation: Preparation and Tactics - 2000 and Beyond (West 2003).

"Spoliation of Evidence" Civil Trial Practice: Winning Techniques of Successful Trial Attorneys (Lawyers & Judges Publishing, 2000), revised and reprinted in, Aircraft Accident Reconstruction and Litigation (Lawyers & Judges Publishing, 2003).

PUBLICATIONS (cont.)

"Percentage Fee Awards in Common Fund Cases" Tulane Law Review Vol. 74, Nos. 5-6, p.2033 (June 2000).

"Back to Basics – Briefing and Arguing Motions" TRIAL Magazine (Oct. 2019) p.18, and, reprinted in revised and edited form, as: "Tips for Briefing and Arguing Motions" Louisiana Advocates (Nov. 2019) p.9.

Contributing Author, "Lead Counsel Duties" Standards and Best Practices for Large and Mass Tort MDLs (Bolch Judicial Institute, Duke Law School) (September 2018).

Editorial Board, Guidelines and Best Practices Implementing 2018 Amendments to Rule 23 (Duke Law School Center for Judicial Studies) (August 2018).

Contributing Author, "Procedures and Standards for Objections and Settlement of Objections Under Rule 23(e)(5)" Guidelines and Best Practices Implementing 2018 Amendments to Rule 23 (Duke Law School Center for Judicial Studies) (August 2018).

"Evidence Preservation and Spoliation" TRIAL Magazine, September 2005, p.50.

"Federal Preemption: *Geier* and Its Implications" Louisiana Advocates Vol.XVI, No.1, p.8 (Jan. 2001).

"The Use and Abuse of Privilege in Discovery" Australian Products Liability Reporter, Vol. 10, No.5 (June 1999).

"Understanding Spoliation of Evidence" TRIAL Magazine March 2001, p.45.

Review of *In Defense of Tort Law,* TRIAL Magazine November 2001, p.86.

"Proposed Changes to Rule 23: Consulting with Practicing Attorneys" Sidebar Vol. 3, No. 2, p.7 (Spring 2002), reprinted in, The Federal Lawyer Vol. 49, No.8, p.14 (Sept. 2002).

"Fighting Mandatory Arbitration" Louisiana Advocates Vol.XVII, No.5, p.13 (May 2002).

"*Roark v. Humana:* What This New Decision Means for Your Medical Malpractice Cases Involving HMOs" Louisiana Advocates Vol. XVIII, No. 1, p.8 (Jan. 2003).

"TLPJ Urges Trial Lawyers to Fight Court Secrecy" Louisiana Advocates Vol.XVII, No.6, p.13 (June 2002).

"Federal Court Upholds Rights of Plaintiffs Who Opted Out of Nationwide Class Action Settlement to Pursue Individual Claims" Louisiana Advocates Vol. XVIII, No. 1, p.14 (Jan. 2003).

"U.S. Supreme Court Rules Asbestosis Victims Can Recover Damages Based on Fear of Cancer" Louisiana Advocates Vol.XVII, No.6, p.7 (June 2003).

"Being a Savvy Blogger" Louisiana Advocates (July 2007), p.12.

"How to Maximize the Advantages of E-Mail and Eliminate the Risks" Louisiana Advocates (August 2007), p.6.

"Standing on the Shoulders of Those Who Came Before Us" Louisiana Advocates Vol. XXIX, No.10 (Oct. 2014).

"To Protect and Preserve an Independent Judiciary" Louisiana Advocates Vol. XXIX, No.12 (Dec. 2014).

"Hot Coffee" Louisiana Advocates Vol. XXX, No.2 (Feb. 2015).

"Personal Remarks" Louisiana Advocates Vol. XXX, No.5 (May 2015).

"How I Spent My Summer Vacations (and Still Remember the Lessons Learned)" Louisiana Advocates Vol. XXX, No.6 (June 2015).

"The Long Arc of Justice" Louisiana Advocates Vol. XXX, No.8 (Aug. 2015).

SPEECHES AND PAPERS

"Removal by Preemption Under the *Avco* Exception...." Litigation at Sunrise, 1996 ATLA Annual Convention, Boston, Massachusetts, July 23, 1996.

"Spoliation of Evidence and Related Topics" Yours to Choose Seminar, LTLA, New Orleans, Louisiana, December 28, 1996.

"The Use and Abuse of Privilege in Discovery" Litigation at Sunrise, 1998 ATLA Annual Convention, Washington D.C., July 1998, and Yours to Choose Seminar, LTLA, Baton Rouge, Louisiana, December 30, 1998.

"Force-Placed Insurance: Banks' Failure to Disclose" Last Chance Seminar, LTLA, New Orleans, Louisiana, December 18, 1998.

"HMO Litigation" Winter Ski Seminar, LTLA, Aspen, Colorado, March 6, 2000, and Last Chance Seminar, Winning With the Masters, LTLA, New Orleans, Louisiana, Dec. 14, 2000.

"Class Action Litigation Against HMOs" 2001 ATLA Annual Convention, Montreal, Canada, July 17, 2001.

"Managing Complex Litigation for the Louisiana Paralegal" Institute for Paralegal Education, New Orleans, Louisiana, July 9, 1999.

"Subrogation and Loss Recovery in Louisiana" National Business Institute, New Orleans, Louisiana, March 24, 2000.

"Can We 'Import' Better Law in Personal Injury Cases?" LTLA Spring CLE Retreat, Orlando, Florida, March 31, 2002.

SPEECHES AND PAPERS (cont.)

"Case Evaluation and Other Pre-Filing Considerations" Tobacco Litigation Group, ATLA Annual Convention, Atlanta, Georgia, July 21, 2002.

"Proving Fraud in Tobacco Cases" ATLA Annual Convention, Atlanta, Georgia, July 21, 2002.

"Preparing and Taking Depositions for Use at Trial" STLA, New Orleans, Louisiana, February 28, 2003, and LTLA *A La Carte* Seminar, New Orleans, Louisiana, December 30, 2004.

"Trial and Post-Trial Motions: The Plaintiff's Perspective" National Business Institute, New Orleans, Louisiana, June 20, 2003.

"A Practical Framework for Class Action Litigation" ABA National Institute on Class Actions, San Francisco, California, Oct. 24, 2003, and Washington, D.C., Nov. 7, 2003.

"Identifying Spoliation of Evidence Issues and Related Issues Surrounding the Preservation and Discovery of Electronic Data" National Business Institute, New Orleans, LA, March 30, 2004, and Lafayette, LA, December 2, 2004.

"Civil Discovery Sanctions" Dealing with Destruction: Preservation and Spoliation of Electronic Data and Other Evidence in Louisiana, National Business Institute, New Orleans, LA, March 30, 2004, and Lafayette, LA, December 2, 2004.

"Plaintiff's Personal Injury from Start to Finish" National Business Institute, New Orleans, Louisiana, November 30, 2004, and New Orleans, Louisiana, June 30, 2006.

"Litigating the Class Action Suit in Louisiana" National Business Institute, New Orleans, Louisiana, January 7, 2005.

"Proposed Changes to the Federal Rules" Electronic Discovery Teleseminar, May 10, 2005, and, ATLA Annual Convention, Toronto, Canada, July 25, 2005.

"Recent Decisions Affecting E-Discovery" E-Discovery: Get Ready to Apply the New FRCP Changes, National Business Institute, New Orleans, Louisiana, December 20, 2006.

"E-Discovery Procedures and Compliance with the New Rules" E-Discovery: Get Ready to Apply the New FRCP Changes, National Business Institute, New Orleans, Louisiana, December 20, 2006.

"Conducting Forensic Analysis" E-Discovery: Get Ready to Apply the New FRCP Changes, National Business Institute, New Orleans, Louisiana, December 20, 2006.

"E-Discovery Under the New Rules" LTLA *A La Carte* Seminar, New Orleans, Louisiana, December 29, 2006.

"The E-Discovery Amendments to the Federal Rules: Panel Discussion - E-Discovery Practical Considerations" Federal Bar Association, New Orleans Chapter, February 2, 2007.

"The E-Discovery Amendments to the Federal Rules: Panel Discussion - E-Discovery Ethics" Federal Bar Association, New Orleans Chapter, February 2, 2007.

"Class Action Reforms Post CAFA: Leverage the Reforms and Emerging Trends" Strafford Publications, CLE Teleconference, March 20, 2007.

"Electronic Evidence Symposium: New Rules, E-Discovery, Spoliation & Sanctions" New Orleans Bar Association, 2007 Bench Bar Conference, Point Clear, Alabama, March 30, 2007.

"Personal Injury Cases: Calculating and Proving Damages" National Business Institute, New Orleans, LA, October 16, 2007.

"Vioxx Litigation: History, Overview and Navigating Through the Settlement Process" AAJ Weekend With the Stars, New York, NY, December 8, 2007.

"E-Discovery: Applying the New FRCP Changes" National Business Institute, New Orleans, LA, Dec. 13, 2007.

"Rethinking Depositions: Discovery vs. Trial" LAJ CLE A La Carte, Baton Rouge, LA, December 27, 2007.

"E-Discovery: A Changing Landscape - Practical & Legal Perspectives" SeminarWeb, January 16, 2008.

"Approaches to Defense Expert Depositions - Technique & Style" AAJ Mid-Winter Convention, Puerto Rico, January 26, 2008.

"E-Discovery Workshop" National Disability Rights Network Annual Conference, New Orleans, LA, June 4, 2008.

"San Diego Fire Cases" Litigation at Sunrise, AAJ Annual Convention, Philadelphia, PA, July 16, 2008.

"E-Discovery: The Paralegal's Role and Ethical Considerations" AAJ Annual Convention, Philadelphia, PA, July 16, 2008.

"Preparation of Expert Testimony" National Business Institute, New Orleans, LA, October 30, 2008.

"Avoiding Common Ethical Pitfalls" Building Your Civil Trial Skills, National Business Institute, New Orleans, LA, December 18, 2008.

"Documentary Evidence" Personal Injury Trials: Getting the Most out of Your Evidence, National Business Institute, New Orleans, LA, April 29, 2009.

"Electronic Evidence" Personal Injury Trials: Getting the Most out of Your Evidence, National Business Institute, New Orleans, LA, April 29, 2009.

SPEECHES AND PAPERS (cont.)

"Ethics and Professionalism" AAJ Jazz Fest Seminar, New Orleans, LA, May 3, 2009.

"12 Lessons in Litigation" Web 2.0 and The Trial Bar, InjuryBoard.com, St. Petersburg, FL, June 5, 2009.

Moderator, Chinese Drywall Litigation Seminar, AAJ, New Orleans, Louisiana, August 11, 2009.

"Re-Thinking Experts" LAJ Post-Legislative Retreat, Carmel, CA, June 30, 2009, LAJ Last Chance Seminar, New Orleans, LA, December 10, 2009, and, LAJ CLE a la Carte, Baton Rouge, LA, December 30, 2009.

"Re-Thinking Experts" SeminarWeb! Live, December 17, 2009.

"Avoiding Common Ethical Pitfalls" Building Your Civil Trial Skills, National Business Institute, New Orleans, LA, December 18, 2009.

"Evaluating Class Actions: How Do You Know When You Have One?" LAJ CLE a la Carte, New Orleans, LA, December 30, 2009.

"Predatory Lending and Sub-Prime Class Actions" AAJ Mid-Winter Convention, Maui, Hawaii, January 30, 2010.

"Coast Guard / MMS Hearings" Gulf Coast Oil Spill Symposium, LSBA, New Orleans, LA, May 25, 2010.

Moderator, Gulf Coast Oil Spill Litigation Teleseminar, AAJ, June 2, 2010.

"Chinese Drywall Litigation" LSBA Summer School for Lawyers, Sandestin, Florida, June 7, 2010.

"12 Lessons in Litigation" LAJ Post-Legislative Retreat, Carmel, CA, June 29, 2010, (invited) (submitted paper) (could not attend).

Moderator, Chinese Drywall Litigation Program, AAJ, Vancouver, British Columbia, July 14, 2010.

Status of BP Claims Facility and Escrow Fund, Gulf Coast Oil Spill Litigation Group Program. Vancouver, British Columbia, July 16. 2010.

Update on MDL Issues and Litigation in the Eastern District of Louisiana, Gulf Coast Oil Spill, Vancouver, British Columbia, July 16, 2010.

"Oil Pollution Act of 1990: An Overview" Gulf Coast Oil Spill Litigation Group Program. Vancouver, British Columbia, July 16. 2010.

Oil Spill Litigation Panel Discussion: Liability, Punitive Damages, Environmental Issues, etc., HB Litigation Conference, Miami, Florida, November 4, 2010.

"Class Actions and Mass Torts" Avoyelles Parish Bar Association, Marksville, Louisiana, November 5, 2010.

"Ethical Issues in Litigation" SeminarWeb! Live, November 8, 2010.

"Ethics and Professionalism" Last Chance Seminar, Louisiana Association for Justice, New Orleans, Louisiana, December 9, 2010.

"Ethics and Professionalism" CLE a la Carte, Louisiana Association for Justice, New Orleans and Baton Rouge, Louisiana, December 30, 2010.

"Ethics and Professionalism in Litigation" AAJ Annual Convention, San Francisco, California, July 2013.

"The BP Oil / *Deepwater Horizon* Oil Spill Litigation: An Overview" Louisiana State Bar Association 20th Annual Admiralty Symposium, New Orleans, Louisiana - September 20, 2013.

Faculty, Essentials of Civil Litigation AAJ Trial Advocacy College, Tulane Law School, New Orleans, Louisiana, October 7-10, 2013.

"Multi-District Litigation" National Association of Women Judges, New Orleans, Louisiana, October 11, 2013.

"Ethical Questions Raised by the BP Oil Spill Litigation" 22nd Annual Admiralty and Maritime Law Conference, South Texas College of Law, Houston, Texas, October 18, 2013.

"BP / Deepwater Horizon Oil Spill Litigation" Louisiana Judicial Conference, Evidence and Procedure Seminar, New Orleans, Louisiana, February 20, 2014.

"Ethical and Professional Issues in MDLs" LSBA Annual MDL Conference, New Orleans, Louisiana, March 14, 2014.

"'Legalnomics': Lessons from the Field of Behavioral Economics About Perception and Decision-Making for Trial Lawyers" LAJ a la Carte, New Orleans and Baton Rouge, Louisiana, December 29-30, 2014, and Mississippi Association for Justice Annual Convention, June 12, 2015.

"When the Levee Breaks – Resolving Complex Claims: Lesson of the Deepwater Horizon, Katrina, and More" ABA Section of Litigation, Annual Conference, New Orleans, Louisiana, April 15, 2015.

"E-Discovery: It's Not Just for Big Civil Suits in Federal Court Anymore" NOBA Bench-Bar Conference, Point Clear, April 17, 2015.

"Ethical and Professional Questions in Mass Tort Cases" LSBA Summer School for Lawyers, Sandestin, Florida, June 10, 2015.

"Telling Our Story: The Trial Lawyer's Journey" LAJ Post-Legislative Retreat, Carmel, California, June 22, 2015, and AAJ Weekend with the Stars, New York, New York, December 12, 2015.

Faculty Moderator, Pound Civil Justice Institute 2015 Forum for State Appellate Court Judges, "Contracting Transparency: Public Courts, Privatizing Processes, and Democratic Practices" and "Judicial Transparency in the 21st Century", Montreal, Canada, July 11, 2015.

SPEECHES AND PAPERS (cont.)

"Sidestepping Some of the *Daubert* Landmines" AAJ Annual Convention, Montreal, Canada, July 14, 2015.

"Unsettling Issues with Mass Tort Settlements" ABA Annual Convention, Chicago, Illinois, July 31, 2015.

Stephen J. Herman and James Bilsborrow, "Much Ado About Nothing: The So-Called 'No-Injury Class'" August 18, 2015.

"Class Actions, Mass Torts and Potential Changes to Rule 23" NOBA Bench-Bar Conference, Point Clear, March 10, 2016.

"Attacks on the Judiciary" LSBA Summer School for Lawyers and Judges, Sandestin, Florida, June 6, 2016.

"Procedure & Tactics in Complex Appellate Proceedings: A Case Study" Texas State Bar, Advanced Civil Appellate Practice, Austin, Texas, September 8, 2016.

"Ethics – Important Recent Developments that Impact Litigators on Both Sides of the 'V'" LSBA 23rd Annual Admiralty Symposium, New Orleans, Louisiana , September 16, 2013.

Duke Law Center for Judicial Studies MDL Conference, Panel 1: Extent of Co-Lead Counsel's and PSC's Fiduciary Responsibility to All Plaintiffs, Washington, DC, October 27, 2016.

"Federal State Coordination: Peacefully Co-existing in Parallel Universes" LSBA 16th Annual Class Action / Complex Litigation Symposium, New Orleans, Louisiana, November 11, 2016.

Moderator, "Pros/Cons of State MDLs: Complex Litigation Rules of Professional Responsibility" LSBA 16th Annual Class Action / Complex Litigation Symposium, New Orleans, Louisiana, November 11, 2016.

"Managing Complex Litigation" NOBA Masters of the Courtroom, New Orleans, Louisiana, December 15, 2016.

"Fool Me Once, Shame on You (and Other Thoughts on Professionalism)" NOBA Procrastinators' Program, New Orleans, Louisiana, December 28, 2016.

"A Conversation on Intergenerational Professionalism" NOBA Bench-Bar Conference, Point Clear, Alabama, April 2, 2017.

"Litigating the Disaster Case" ABA Business Section, New Orleans, Louisiana, April 6, 2017.

"Defense Perspective" AAJ Future of Class Actions Conference, Nashville, Tennessee, May 11, 2017.

"Duties Owed by Appointed Counsel to MDL Litigants Whom They Do Not Formally Represent" AAJ Mass Torts Best Practices Seminar, Boston, MA, July 21, 2017.

"Handling Complex Litigation" EDLA First Biennial Bench and Bar Conference, September 28, 2017.

"Duties Owed by Appointed Counsel to MDL Litigants Whom They Do Not Formally Represent" LSBA 17th Annual Class Action/Complex Litigation Symposium, New Orleans, LA, November 10, 2017.

Faculty, AAJ Advanced Deposition College, New Orleans, LA, January 2018.

"Social Media as Evidence" LAJ / La. Judicial College Evidence & Procedure Seminar, New Orleans, Louisiana, March 16, 2018.

Duke Law Center for Judicial Studies MDL Conference, Panel 3: Standards in Determining Optimum Number of PSC Members and Amounts of Common Benefit Fund, Atlanta, Georgia, April 26, 2018.

"Emerging Issues in Civil Litigation" George Mason University Law & Economics Center 12th Annual Judicial Symposium on Civil Justice Issues, Arlington, Virginia, May 21, 2018.

Panel: Update on La. Supreme Court Committee on Ethical Rules in Complex Litigation and Multi-District Litigation, LSBA Summer School for Lawyers, Sandestin, Florida, June 5, 2018.

"Ethics of Class Action Settlements" AAJ Annual Convention, Denver, Colorado, July 8, 2018.

"Punitive Damages After *Batterton, Tabingo,* and *McBride*: What's Next?" LAJ High Stakes on High Seas, New Orleans, Louisiana, August 17, 2018, and LSBA 25th Annual Admiralty Symposium, New Orleans, Louisiana, September 14, 2018.

Program Coordinator / Moderator, LSBA Personal Injury Seminar, September 7, 2018.

Faculty, AAJ Mass Tort Deposition College, New Orleans, Louisiana, October 24-26, 2018.

"The 'Take No Prisoners' Deposition" AAJ Mass Tort Deposition College, New Orleans, Louisiana, October 24, 2018.

"So, You Settled the Case: Now What?" AAJ Class Action Seminar, New York, NY, December 6, 2018.

"Ethics" NOBA Procrastinators' Program, New Orleans, LA, December 19, 2018.

"Four Hot Spots to Avoid Legal Malpractice" AAJ Mid-Winter Convention, Miami, FL, February 5, 2019.

"Current Landscape of Punitive Damages under Maritime Law" ABA Admiralty and Maritime Law Conference, New Orleans, LA, March 23, 2019.

"Bet the Company Litigation: Are We Really Going to Trial?" LSBA Annual Convention, Sandestin, FL, June 3, 2019, and, New Orleans, LA, December 12, 2019.

SPEECHES AND PAPERS (cont.)

"Why Knowing Admiralty Law is Important to Your Practice" Melvin Belli Seminar, San Diego, CA, July 26, 2019.

"Ethical Issues in Class Action Litigation" AAJ Annual Convention, San Diego, CA, July 28, 2019.

"Ethical Issues Facing Litigators" LSBA, Lafayette, LA, Sept. 5, 2019, and New Orleans, LA, Sept. 20, 2019.

"Layers of Lawyers in MDLs: Parsing the Complexities of Claimant Representation in Mass Tort MDLs" Lewis & Clark Symposium on Class Actions, Mass Torts, and MDLs: The Next 50 Years" Portland, Oregon, Nov. 1, 2019.

"Fee Disputes: Intersection of Ethical Rules and Contract Law" Avoyelles Parish Bar CLE, Marksville, LA, November 8, 2019.

"Thoughts on Professionalism" New Orleans Bar Association, Nov. 26, 2019.

"Ethics: Survey of Recent Cases and Advisory Opinions" New Orleans Bar Association, November 26, 2019, and, Louisiana State Bar Association, New Orleans, LA, Dec. 11, 2019.

Program Coordinator / Moderator, LSBA Personal Injury Seminar, December 4, 2019.

"Next Big Thing(s) – What Are the New Class Actions to Watch For?" AAJ Class Action Seminar, New York, NY, December 5, 2019.

"E-Discovery from the Plaintiff's View" New Orleans Bar Association, December 12, 2019.

"A Trial Lawyer's Journey" Winning With the Masters, LAJ, New Orleans, LA, December 12, 2019, and, Western Trial Lawyers Association, Jackson Hole, WY, March 6, 2020 (invited) *

"Legal Ethics in Maritime Cases" Admiralty Law Institute, Tulane University Law School, New Orleans, LA, March 13, 2020.

"Financing Litigation: Views from the Bench and Bar" NOBA Bench-Bar Conference, Point Clear, AL, March 22, 2020 (invited) *

"Bet the Company Litigation: Are We Really Going to Trial?" LSBA Annual Convention, Sandestin, FL, June 8, 2020 (invited) *

"Masters of Disaster: What 9/11, Hurricane Katrina, and Northern California Fires Taught Us That Can Help You with Your Case During and After the COVID Crisis" San Francisco Trial Lawyers Association, SeminarWeb, June 22, 2020.

"Ethical Issues Facing Litigators" Louisiana State Bar Association, New Orleans, LA, June 19, 2020 (invited) *

"Difficult Depositions: Ethical Issues and Strategies" AAJ Annual Convention, Washington, DC, July 14, 2020.

"Whether to Pursue an MDL, and, if so, Issues Affecting What Court to Recommend to the JPML" Baylor Law School Complex Litigation Program, August 4, 2020.

"Plaintiff Perspective on Common Benefit Orders" Baylor Law School Complex Litigation Program, August 13, 2020.

"How to Get the Most out of Lay Witnesses" FBA Federal Practice Series, New Orleans, LA, August 20, 2020.

"Implications for Civil Litigation and the Courts in a Post-Pandemic World" COVID and the Courts Symposium, sponsored by the Civil Justice Research Initiative at Berkeley Law School and RAND, September 24, 2020.

"Case Management" Mass Tort MDL Certification Program, Bolch Judicial Institute, Duke University, Nov. 9, 2020.

"Ethics: Update of Recent Decisions" New Orleans Bar Association, Nov. 17, 2020.

"Thoughts on Professionalism" New Orleans Bar Association, Nov. 17, 2020.

"Evaluation, Preparation, Research and Background Checks on Plaintiff and Defense Experts" New Lawyers Bootcamp, AAJ, April 12, 2021 (invited)

"Difficult Depositions: Ethical Issues and Strategies" Arkansas Trial Lawyers Association, Little Rock, AR, April 31, 2021 (invited)

"Bet the Company Litigation: Are We Really Going to Trial?" LSBA Annual Convention, Sandestin, FL, June 6, 2021 (invited)

* Postponed or Cancelled Due to the Covid-19 Coronavirus Crises.

REPORTED CASES

Alliance for Affordable Energy vs. New Orleans City Council,, No. 96-0700 (La. 7/2/96), 677 So.2d 424.

O'Reilly and Griffith vs. Brodie, et al and PMIC, 975 S.W.2d 57 (Tex. App. 4th Dist. - San Antonio 1998), *review denied,* (Aug. 25, 1998); and, 42 *ATLA Law Reporter* 264 (Sept. 1999).

Marchesani v. Pellerin-Milnor, 248 F.3d 423 (5th Cir. 2001), *and,* 269 F.3d 481 (5th Cir. 2001); and, *ATLA Law Reporter,* Vol. 46, p.240 (Sept. 2003), and *Louisiana Advocates* Vol.XVIII, No.4 (April 2003) p.14.

Scott v. American Tobacco, No. 01-2498 (La. 9/25/01), 795 So.2d 1176, *and,* No. 02-2449 (La. 11/15/02), 830 So.2d 294, *and,* No. 2004-2095 (La. App. 4th Cir. 2/7/07), 949 So.2d 1266, *writ denied,* 973 So.2d 740 (La. 2008), *cert. denied,* 128 S.Ct. 2908 (2008), *and, later proceeding,* No. 2009-0461 (La. App. 4th Cir. 4/23/2010), 36 So.3d 1046, *writ denied,* 44 So.3d 686 (La. 2010), *cert. denied,* 131 S.Ct. 3057 (2011).

REPORTED CASES (cont.)

Schultz v. Texaco Inc., 127 F.Supp.2d 443 (S.D.N.Y. 2001), *and,* 308 F.Supp.2d 289 (S.D.N.Y. 2004), *and,* 2009 WL 455163 (S.D.N.Y. Feb. 24, 2009).

Oubre / Orrill v. Louisiana Citizens Fair Plan, No. 09-0566 (La. App. 4th Cir. 12/09/09), 26 So.3d 994, *and,* No. 2009-0888 (La. App. 4th Cir. 4/21/2010), 38 So.3d 457, *writ denied,* 45 So.3d 1035 (La. 2010); *and,* No. 2011-0097 (La. 12/16/2011), 79 So.3d 987.

In re Oil Spill by the Oil Rig Deepwater Horizon, 808 F.Supp.2d 943 (E.D.La. 2011) ("B1 Order"); *and,* 910 F.Supp.2d 891 (E.D.La. 2012), *aff'd,* 739 F.3d 790 (5th Cir. 2014) ("*Deepwater Horizon II*"), *cert. denied,* 135 S.Ct. 754 (2014); 744 F.3d 370 (5th Cir. 2014) ("*Deepwater Horizon III*"); 785 F.3d 986 (5th Cir. 2015) ("*Rule 79 Decision*"); 785 F.3d 1003 (5th Cir. 2015) ("*Non-Profits Decision*"); 793 F.3d 479 (5th Cir. 2015) ("*Data Access Appeal*"); 858 F.3d 298 (5th Cir. 2017) ("*495 Appeal*"); *and,* 295 F.R.D. 112 (E.D.La. 2013) (approval of Medical Benefits Settlement); *and,* 21 F.Supp.3d 657 (E.D.La. 2014) ("Phase One Trial Findings and Conclusions").

In re Harrier Trust, No. 2018-1467 (La. 2/18/2019), 263 So.3d 884.

Duhon v. Activelaf d/b/a SkyZone, No.2016-1818 (La. 10/19/2016), 218 So.3d 1001 (and 2016 WL 6123820) (*amicus curiae*).

Maggio v. Parker, No.2017-1112 (La. 6/27/2018), 250 So.3d 874 (*amicus curiae*).

Bulot v. Intracoastal Tubular, No. 00-2161 (La. 2/9/01), 778 So.2d 583 (*amicus curiae*).

Dumas v. Angus Chemical, No. 97-2356 (La. 11/14/97), 702 So.2d 1386.

Sommers v. State Farm, No. 99-2586 (La. App. 4th Cir. 5/3/00), 764 So.2d 87.

Andrews v. TransUnion Corp., No. 2004-2158 (La. App. 4th Cir. 8/17/2005), 917 So.2d 463, *writ denied,* 926 So.2d 495 (La. 4/17/06), and MDL No. 1350; *Louisiana Advocates,* Vol.XXIV, No.5 (May 2009), p.14.

Bratcher v. National Standard Life, 365 F.3d 408 (5th Cir. 2004), *cert. denied,* 125 S.Ct. 277 (2004).

Bauer v. Dean Morris, 2011 WL 3924963 (E.D.La. Sept. 7, 2011).

Schafer v. State Farm, 507 F.Supp.2d 587 (E.D.La. 2007), *and,* 2008 WL 131225 (E.D.La. Jan 10, 2008).

Moeckel v. Caremark Inc., 385 F.Supp.2d 668 (M.D. Tenn. 2005).

In re Managed Care Litigation, 150 F.Supp.2d 1330 (S.D.Fla. 2001).

Lakeland Anesthesia v. Aetna U.S. Healthcare, 2000 U.S. Dist LEXIS 8540 (E.D.La. June 15, 2000), *Andrews Managed Care Litigation Reporter,* Vol.I, Issue 13 (July 17, 2000) p.12.

Mays v. National Bank of Commerce, 1998 U.S. Dist. LEXIS 20698 (N.Dist. Miss. Nov. 20, 1998), *aff'd* No. 99-60167 (5th Cir. April 11, 2000).

Jones v. Hyatt, No. 94-2194 (La. App. 4th Cir. 9/25/96), 681 So.2d 381 (appeal counsel).

Delcambre v. Blood Systems, Inc., No. 2004-0561 (La. 1/19/05), 893 So.2d 23 (*amicus curiae*).

VERDICTS, DECISIONS, REPORTED SETTLEMENTS AND AWARDS

Scott v. American Tobacco, et al, Civil District Court for the Parish of Orleans, State of Louisiana, No. 96-8461, July 28, 2003, (Jury verdict in Phase I trial for class of Louisiana smokers finding tobacco industry liable for fraud, conspiracy, and intentional torts, and responsible for the establishment of a court-supervised medical monitoring and/or cessation program), and, May 21, 2004 (Jury verdict in Phase II in the amount of $591 Million for 10-year comprehensive court-supervised smoking cessation program), *aff'd, in part,* No. 2004-2095 (La. App. 4th Cir. 2/7/07) (upholding award of $279 Million fund to Class for 10-year cessation program), *on subsequent appeal,* No. 2009-0461 (La. App. 4th Cir. 4/23/2010), 36 So.3d 1046 (ordering Defendants to deposit $241 Million, plus interest, into the Registry of the Court), *writ denied,* 44 So.3d 686 (La. 2010), *cert. denied,* 131 S.Ct. 3057 (2011) (Member of Trial Team, Philip Morris Team, and co-Lead of Briefing Team).

In re Oil Spill by the Oil Rig *Deepwater Horizon*, 21 F.Supp.3d 657 (E.D.La. 2014) (Phase One Trial Findings & Conclusions that BP was guilty of gross negligence and reckless and willful misconduct) (Co-Liaison Counsel for Plaintiffs and member of the Trial Team).

In re Oil Spill by the Oil Rig *Deepwater Horizon,* 910 F.Supp.2d 891 (E.D.La. 2012), *aff'd,* 739 F.3d 790 (5th Cir. 2014), *rehearing en banc denied,* 756 F.3d 320 (5th Cir. 2014), *cert. denied,* 135 S.Ct. 734 (2014) (approving BP Economic & Property Damages Class Settlement), *and,* 295 F.R.D. 112 (E.D.La. 2013) (approving BP Medical Benefits Class Settlement) (Settlements in Excess of $12.9 Billion) (Co-Lead Class Counsel), *and,* No.10-2179, Rec. Doc. 22252 (E.D.La. Feb. 15, 2017), *aff'd,* 934 F.3d 434 (5th Cir. 2019) (approving Distribution Model for $1.25 Billion Halliburton/Transocean Class Settlements) (Co-Lead Class Counsel).

VERDICTS, DECISIONS, REPORTED SETTLEMENTS AND AWARDS (cont.)

Hernandez v. Knauf, No.09-6050, 2010 WL 1710434, *In re Chinese-Manufactured Drywall Products Liability Litigation,* MDL No. 2047 (E.D.La. April 27, 2010) (awarding over $164,000 in remediation and other damages, plus interest, costs, and reasonable attorneys' fees, in first bellwether trial, holding that all drywall, insulation, entire electrical system, HVAC system and copper plumbing must be removed) (Co-Lead Trial Counsel).

In re Chinese-Manufactured Drywall Products Liability Litigation, 424 F.Supp.3d 456 (E.D.La. 2020) (approving class settlement of $248 Million against Chinese Manufacturers) (Settlement Class Counsel).

Marchesani v. Pellerin-Milnor, 248 F.3d 423 (5th Cir. 2001), *and,* 269 F.3d 481 (5th Cir. 2001), and, *Louisiana Advocates* Vol.XVIII, No.4 (April 2003) p.14, and *ATLA Law Reporter,* Vol. 46, p.240 (Sept. 2003) ($3.375 million settlement).

Turner v. Angelo Iafrate, et al, No. 596-274 (La. 24th JDC), *Louisiana Advocates,* Vol.XXI, No.10, p.15 (Oct. 2006), and, *AAJ Law Reporter,* Vol.L, No.6 (Aug. 2007) ($4.5 million settlement).

Niven v. Boston Old Colony, et al, 24th JDC, State of Louisiana, No.373-299, December 28, 1998, (judgment of $529,027.02 for plaintiff against La. DOTD - total damages $5,290,270.20), *rev'd,* No. 99-783 (La. App. 5th Cir. 1/25/2000).

Schultz v. Stoner, et al, 127 F.Supp.2d 443 (S.D.N.Y. 2001), *and,* 308 F.Supp.2d 289 (S.D.N.Y. 2004), *and,* 2009 WL 455163 (S.D.N.Y. Feb. 24, 2009) (summary judgment granted in favor of mis-classified employees' right to benefits under the Texaco pension plans).

Oubre v. Louisiana Citizens Fair Plan, No. 2011-0097 (La. 12/16/2011), 79 So.3d 987 (affirming class judgment of $92.8 Million).

In re: Vioxx Prod. Liab. Lit., MDL No. 1657 (E.D.La.), *Louisiana Advocates,* Vol.XXIII, No.1 (Jan. 2008) ($4.85 Billion Settlement Fund) (Co-Chair of Sales & Marketing Committee, Insurance Committee, Member of Drafting Team for PNC).

Andrews v. TransUnion Corp., No. 2004-2158 (La. App. 4th Cir. 8/17/2005), 917 So.2d 463, *writ denied,* 926 So.2d 495 (La. 4/17/06), and MDL No. 1350, *Louisiana Advocates,* Vol.XXIV, No.5 (May 2009), p.14 ($75 million settlement fund and significant additional in-kind relief).

DeGarmo v. Healthcare Recoveries, Inc., No. 5:94cv14 (N.D.W.Va. 2001), 45 *ATLA Law Reporter* 180 (June 2002), and *Louisiana Advocates,* Vol.XVI, No.9, p.10 (Sept. 2001) ($3 million settlement for class of policyholders for unlawful subrogation practices).

Galuzska v. Rosamond and GEICO, No.618-435 (La. 24th JDC), *Louisiana Advocates,* Vol.XXIII, No.6 (June 2008) ($925,000 settlement in auto case).

Marberry v. Sears, 15th JDC, State of Louisiana, No.96-3244, December 7, 1998, (judgment of $195,054.96 for plaintiff).

Kettles v. Hartford Life, 1998 U.S. Dist. LEXIS 12899 (E.D.La. Aug. 14, 1998) (summary judgment for plaintiff awarding over $80,000 in disability benefits).

EXPERT TESTIMONY

Mitchell v. Freese, Civil Action No. 61C11:16-CV-00023, Circuit Court, Rankin County, Mississippi, (report August 24, 2017), (testimony, arbitration proceeding, November 15, 2017) (ethical and professional duties to clients and co-counsel in mass tort cases).

U.S. ex. rel. Boogaerts v. Vascular Access Centers, No. 17-2786, United States District Court for the Eastern District of Louisiana, (declaration submitted on November 2, 2018 in support of fee petition for prevailing relator in *qui tam* case).

Holmes v. Pigg, No. 2007-2803, Civil District Court, Parish of Orleans, State of Louisiana, (deposition September 20, 2011) (legal malpractice liability arising out of an ERISA case).

Cressy v. Lewis, No. 2017-2704, Civil District Court, Parish of Orleans, State of Louisiana, (report October 14, 2019) (alleged malpractice liability in product liability case).

Hampton v. Hampton, No. 775-881, 24th Judicial District Court, State of Louisiana, (preliminary report of questions and impressions re fee request of adversary party).

Bayou Corne Sinkhole Litigation: *LaBarre v. Occidental,* No.33796, 23rd Judicial District Court, State of Louisiana, (report July 7, 2020 in support of AIG's Reconventional Demand on Texas Brine's claim for reimbursement of costs and attorneys' fees, and report August 10, 2020 relating to Texas Brine's Third-Party claims for costs and fees against Zurich and AIG).

Cantu v. Gray Ins. Co., No.745-245, 24th Judicial District Court, State of Louisiana (report submitted Jan. 15, 2021 in fee dispute between former counsel and subsequent counsel for plaintiff on intervention) (deposition Jan. 22, 2021).

PG&E Fire Victims Trust, Bankruptcy Case No. 19-30088 (declaration submitted on February 15, 2021 in support of reimbursement of attorneys fees to Fire Victim Trust Claimants represented by Singleton Schreiber McKenzie & Scott, LLP)

OTHER ACTIVITIES, APPEARANCES, APPOINTMENTS, RECOGNITION, AND AWARDS

A/V Rated, Martindale-Hubbell.

Finalist, Trial Lawyer of the Year Award, TLPJ, 2005.

Leadership in the Law Recipient, *New Orleans CityBusiness,* 2010, 2017, 2018.
Hall of Fame, 2018.

Louisiana Appleseed, Board of Trustees, 2018 -

Top 500 Lawyers in America, *Lawdragon,* 2013, 2018, 2020.

Best Lawyers in America, 2012 -
"Lawyer of the Year" in the area of Product Liability Litigation, in New Orleans, by Best Lawyers, 2016.
Also recognized in areas of Appellate Practice, Mass Tort / Class Actions, and Personal Injury Litigation, as of 2020.

"Superlawyer" in the area of Class Actions and Mass Torts, 2007 -

Top 100 Trial Lawyers, National Trial Lawyers Association, 2008 -

Million Dollar Advocates Forum.

Appointed Plaintiffs' Co-Liaison Counsel / Co-Lead Class Counsel, *In re: Deepwater Horizon,*
MDL No. 2179, Civil Action No. 2:10-md-02179, USDC for the Eastern District of Louisiana.

Appointed to the Plaintiffs' Steering Committee, *In re: Express Scripts Pharmacy Benefits Management Litigation,*
MDL No. 1672, Civil Action No. 4:05-md-01672-SNL, USDC for the Eastern District of Missouri.

Appointed to the Plaintiffs' Executive Committee, *In re: Cox Set-Top Box Antitrust Litigation,*
MDL No. 2048, Civil Action No. 5:09-ml-02048-C, USDC for the Western District of Oklahoma.

Appointed to the Plaintiffs' Executive Committee, *In re: Budeprion XL Marketing and Sales Litigation,*
MDL No. 2107, Civil Action No. 09-md-2107, USDC for the Eastern District of Pennsylvania.

Appointed Settlement Class Counsel, *In re Chinese Drywall Litigation,* MDL No. 2047
(re Class Settlement with Taishan Defendants, 2019).

Curator *Ad Hoc, Boomco LLC vs. Ambassador Inn Properties, et al,* CDC No. 98-21208, Parish of Orleans, State of Louisiana.

Receiver, *In re P. Michael Doherty Breeden, III,* No.2020-OB-00315, appointed by Chief Judge, CDC, Parish of Orleans.

Host Committee, Fifth Circuit Judicial Conference, New Orleans, Louisiana, April 19-22, 1998.

Moderator, "Dangerous Secrets: Confronting Confidentiality in Our Public Courts" sponsored by AAJ and the Pound Institute, October 13, 2020.

Moderator, "Winning With the Masters" Last Chance Seminar, LTLA, New Orleans, Louisiana, December 19, 1998.

Moderator, "Winning With the Masters" Last Chance Seminar, LTLA, New Orleans, Louisiana, December 14, 2000.

Welcome, ATLA Jazz Fest Seminar, New Orleans, Louisiana, May 1, 2003.

Guest Appearance, *It's the Law* "Challenges for the 21st Century" New Orleans Bar Association, March 15, 1999.

Guest Appearance, *Bev Smith Show* "Is Tobacco Litigation Good For America?" American Urban Radio Network, June 8, 2000;
The Morning Show "Are Tobacco Lawsuits Good For America?" KRLV Radio, June 9, 2000;
On the Air with Mike Bung "Tobacco Litigation and Challenges for the 21st Century" 1540 AM, June 15, 2000.

Guest Lecturer, "The Nuremberg Trials" Touro Synagogue Religious School, April 2003.

Judge, ATLA Student Trial Advocacy Competition, Finals, New Orleans, Louisiana, March 26, 1999.

Associate Member, Louisiana Injured Employees Union Education Fund, 1999-2003.

Board of Directors, Touro Synagogue Brotherhood, 1998-2000.

Top Individual Fundraiser, Susan G. Komen Race for the Cure, Oct. 25, 2014.

Advocacy Award, Breastoration, (Cancer Association of Greater New Orleans), 2019.

Member, Mystery Writers Association, 1999 -

Author of Three Novels: The Gordian Knot (Gravier House Press 1998), The Sign of Four (Gravier House Press 1998), and A Day in the Life of Timothy Stone (Gravier House Press 1999), as well as a fourth book, My Life As a Spy.

Maintains Website / Blog regarding Legal, Literary and Other Issues, including updates of What's New in the Courts, including What's New in Products Liability, Class Actions, Legal Ethics and Professionalism, ERISA Litigation, and Electronic Discovery and Spoliation, at: www.gravierhouse.com.

EXHIBIT C

DECLARATION OF GEORGE C. RODGERS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS LIABILITY LITIGATION	MDL No. 2741
	Case Number: 3:16-md-02741-VC
This Document Relates to:	**DECLARATION OF GEORGE C. RODGERS, M.D., PH.D.**
Ramirez, et al.	**IN OPPOSITION TO MOTION FOR PRELIMINARY APPROVAL OF PROPOSED CLASS SETTLEMENT, APPOINTMENT OF INTERIM CLASS AND SUBCLASS COUNSEL, DIRECTION OF NOTICE UNDER FED. R. DIV P. 23(e), SCHEDULING OF A FAIRNESS HEARING, AND STAY OF THE FILING AND PROSECUTION OF ROUNDUP-RELATED ACTIONS BY SETTLEMENT CLASS MEMBERS**
Plaintiff(s),	
vs.	
Monsanto Co.	
Defendant(s).	
Case No. 3:19-cv-02224	

I, George C. Rodgers, M.D., Ph.D. declare:

1. I have personal knowledge concerning the matters addressed herein and submit this declaration in opposition to the Motion for Preliminary Approval of Proposed 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. If called as a witness, I would testify to the opinions set forth in this declaration. I hold all of the opinions in this declaration to a reasonable degree of scientific and medical certainty.

2. I received my Ph.D. in Organic Chemistry from Yale University and my M.D. from the State University of New York. I hold board certifications in Pediatrics and Medical Toxicology.

3. I currently hold the following positions at the University of Louisville School of Medicine: Professor of Pediatrics/Pharmacology/Toxicology, and International Pediatrics; Chief, Section of International Pediatrics; and Humana Chair in International Pediatrics.

4. I have been the Associate Medical Director of the Kentucky Regional Poison Center from 2003 to the present.

5. Since 1998, I have been on the board of the Committee on Pesticide Exposures in Children at the EPA. Since 2000, I have been on the board of the CDC Advisory Committee on Childhood Lead Poisoning. Since 2000 I have been on the board of the American Academy of Clinical Toxicology's Pediatric Poisoning committee. I have been on the board of the National Academy of Sciences' Committee on Acute Exposure Guidelines since 2009. I was on the board of the National Committee to Develop Acute Exposure Guideline Levels for Hazardous Substances at the Environment Protection Agency (EPA) from 1996 to 2007.

6. This declaration is written regarding certain instructions given to a five-person science panel. It is my understanding that they may be charged with finding that there is a positive causal association between the environmental toxin glyphosate and the medical endpoint non-Hodgkin's lymphoma with an affirmation "that such positive association is not due to chance, confounding, or bias." In my opinion, this can never be said with the absolute certainty the instruction to the science panel requires.

7. "Chance, confounding, and bias" are terms used in epidemiology. Even though the results of an epidemiological study may reflect the true effect of an exposure to a toxic substance under investigation and conclude that there is a positive association between exposure to that toxic substance and a medical endpoint, given the nature of epidemiology, this conclusion cannot completely eliminate chance (random error), bias, or confounding factors. Any study of environmental toxins, no matter how well conducted, cannot entirely eliminate these. This is

particularly true in the case of observational studies, because all confounding factors depend on available data which can never be completely controlled for.

8. In concluding that there is an association, we rely on the convention of statistical significance. However, even this convention does not entirely rule out chance, bias, or confounding factors. Statistical significance is an accepted mathematical determination where we agree chance is very unlikely, but it cannot be completely eliminated.

9. I have also been asked to opine on the second charge to the panel where this same group must decide on a single minimum internal dose before a primarily airborne environmental toxin can cause a specific human cancer. It is my opinion that it would not be within the medical or scientific standard of care to answer this question.

10. First, studies of environmental toxins are not interventional, meaning we do not give measured doses of a toxin to a human as is done in pharmaceutical trials. Certainly, there would not be any studies where humans were given glyphosate to see if it caused them to get non-Hodgkin's lymphoma or any other type of cancer.

11. It appears that the panel is being instructed to calculate an internal dose before a specific cancer endpoint can occur in humans relying solely on non-human experimental data. However, definitively extrapolating this data to a non-Hodgkin's endpoint or any specific cancer endpoint cannot be done given the difficulties of quantifying dose and the huge variability in human reactions among other things. This is particularly true with a latent disease such as cancer.

12. Even if this were possible, it would still not be possible to then calculate an internal dose based on past exposure in a trial setting, as is assumed by the science panel's exercise. The best that can be done is to estimate the frequency, duration and proximity of exposure. But this only explains what an individual might have been exposed to; it does not measure what actually entered that individual's body which is what internal dose means.

13. Furthermore, even estimating past exposure to try to come up with some calculation is fraught with the difficulties of relying on memories, often poor record-keeping, a

lack of knowledge regarding environmental conditions, etc. To put it bluntly, it is scientifically impossible to calculate the internal dose someone going to trial might have had when they were exposed to an airborne toxin often long in the past, which I am informed and believe would be argued as necessary to prove if the science panel came to a conclusion of the minimum internal dose required before someone could get non-Hodgkin's lymphoma.

14. Furthermore, I have been asked whether in my medical and scientific practice I have seen or heard of this methodology to determine whether a substance causes cancer. The answer is that I have not. In science and medicine, there are accepted standards for assessing whether a substance causes cancer in humans. In my opinion, conclusions of the International Agency for Research on Cancer Working Groups that has been convened to make such determinations would be far more reliable than a five-person private and secret group as contemplated by the settlement. The proposed science panel does not follow the scientifically accepted methodologies that an IARC Working Group follows nor is it being selected from experts relevant to all of the pertinent fields necessary to draw such conclusions. Indeed, the questions being asked of the science panel here are questions that are generally contemplated by large working groups skilled in epidemiology, toxicology, oncology and biostatistics to list just a few of the necessary disciplines.

15. Finally, I am unaware of any medical professionals who require a calculated internal dose of a substance before being able to opine on whether the substance can cause cancer in a specific person. This is not a generally accepted practice required to determine whether a substance can cause a cancer in humans.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on March 3, 2021.

Signature: _____

Printed name: George C. Rodgers, M.D., Ph.D.