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22 *Attorneys for Plaintiffs*

23 **UNITED STATES DISTRICT COURT**  
24 **NORTHERN DISTRICT OF CALIFORNIA**

25 IN RE: ROUNDUP PRODUCTS LIABILITY  
26 LITIGATION

MDL No. 2741

Case No. 16-md-02741-VC

27 This document relates to:  
28 *Cervantes v. Monsanto Co.*, 3:19-cv-03015-VC  
*Karman v. Monsanto Co.*, 3:19-cv-01183-VC  
*Pecorelli v. Monsanto Co.*, 3:19-cv-06936-VC  
*Peterson v. Monsanto Co.*, 3:19-cv-07271-VC  
*Rehak v. Monsanto Co.*, 3:19-cv-01719-VC  
*Schafer v. Monsanto Co.*, 3:19-cv-02169-VC  
*Seidl v. Monsanto Co.*, 3:17-cv-00519-VC

**PLAINTIFFS' RESPONSE IN  
OPPOSITION TO MONSANTO'S  
MOTION TO EXCLUDE  
TESTIMONY OF DR. CHARLES  
BENBROOK, DR. CHARLES  
JAMESON, AND MR. STEPHEN  
PETTY**

29 In response to Monsanto's Motion to Exclude Testimony of Dr. Charles Benbrook, Dr.  
30 Charles Jameson, and Mr. Steven Petty,<sup>1</sup> and consistent with the Court's repeated instructions not  
31 to relitigate issues previously ruled upon and applying the principles in Pre-Trial Order 202, but

32 <sup>1</sup> This responds to Document 12781.

1 in order to fully preserve the appellate record, Plaintiffs hereby incorporate the following pleadings  
2 that were filed on the MDL docket:

- 3 • Plaintiffs' Response to Motion to Exclude Testimony of Dr. Charles Jameson on  
4 *Daubert* Grounds (ECF #8332)
- 5 • Plaintiffs' Response in Opposition to Defendant Monsanto Company's Motion to  
6 Exclude Testimony of Dr. Charles Benbrook (ECF #8344)
- 7 • Plaintiff's Response in Opposition to Defendant Monsanto Company's Motion to  
8 Exclude Testimony of Mr. Stephen Petty (ECF #8357)
- 9 • Plaintiffs' Response in Opposition to Defendant Monsanto Company's Motion to  
10 Exclude Testimony of Mr. Stephen Petty (ECF #8359-3)

11 By incorporating by reference prior filings and attaching them to this pleading, Plaintiffs  
12 are in no way waving any arguments raised therein.

13 DATED: April 2, 2021

14  
15 Respectfully submitted,

16 /s/ Fatima Abuzerr

17 Ken Moll

18 Rebecca Fredona

19 Fatima Abuzerr

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*Attorneys for Plaintiffs*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2nd day of April 2021, a copy of the foregoing 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/ Fatima Abuzerr

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