



Eric G. Lasker
dir 202 898 5843
elasker@hollingsworthllp.com

May 26, 2017

FILED VIA ECF

Honorable Vince Chhabria
United States District Court, Northern District of California

Re: *In re Roundup Prods. Liab. Litig.*, No. 3:16-md-02741-VC

To the Honorable Vince Chhabria,

Monsanto submits this short reply to plaintiffs' supplement to the parties' May 22, 2017 joint discovery letter regarding the scheduling of expert discovery in light of PTO 23. In their supplemental filing, plaintiffs state that one of their two disclosed epidemiology experts (and one of the five plaintiffs' experts who offer epidemiology opinions in their expert reports) "is unavailable for much of November and possibly into December." Plaintiffs argue that this would make it "very difficult if not impossible" for this one plaintiffs' expert to accommodate the schedule proposed by Monsanto in the parties' joint submission. There in fact is no such conflict. Under Monsanto's proposed schedule, expert depositions will be conducted between August 18 and September 22 and the evidentiary Daubert hearing will be conducted during the week of December 11.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read "Joe G. Hollingsworth".

Joe G. Hollingsworth (*pro hac vice*)
(jhollingsworth@hollingsworthllp.com)
Eric G. Lasker (*pro hac vice*)
(elasker@hollingsworthllp.com)
HOLLINGSWORTH LLP
1350 I Street, N.W.
Washington, DC 20005
Telephone: (202) 898-5800
Facsimile: (202) 682-1639

Attorneys for Defendant
MONSANTO COMPANY