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Counsel for Amici Curiae

**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. 3:16-md-02741-VC

**NOTICE OF MOTION AND MOTION
FOR LEAVE TO FILE OPPOSITION
OF 93 LAW FIRMS AND 167 LAWYERS
AS *AMICI CURIAE* TO 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**

The Honorable Vince Chhabria
Date: March 31, 2021
Time: 10:00 am
Courtroom 4 – 17th Floor

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT 93 law firms and 167 lawyers collectively move the Court for leave to file a brief as *amici curiae* in opposition to the Motion for Preliminary Approval of Proposed Class Action Settlement and related relief in this case. A copy of the proposed *amici curiae* brief is attached to this motion, as is a proposed order. A complete list of law firms seeking to participate as *amici curiae* is attached as Exhibit A to the proposed brief. A complete list of lawyers seeking to participate as *amici curiae* is attached as Exhibit B to the proposed brief. Counsel respectfully requests the opportunity to participate in oral argument regarding the proposed settlement's propriety.

In the absence of specific rules governing *amicus curiae* appearances at the district court level, district courts may look to the rules governing *amicus curiae* participation in appellate courts. *See Baker v. Oregon Mutual Insurance Company*, No. 20-cv-05467-LB, 2021 WL 24841, at *2 n.7 (N.D. Cal. Jan. 4, 2021) (citing *Levin Richmond Terminal Corp. v. City of Richmond*, No. 20-CV-01609-YGR, 2020 WL 5074263, at *1 n.1 (N.D. Cal. Aug. 27, 2020)); *Ass'n of Am. Physicians & Surgeons, Inc. v. Brown*, No. 2:16-cv-02441-MCE-EFB, 2017 WL 4351766, at *2 (E.D. Cal. Sept. 29, 2017) (granting motion for leave to file as *amicus curiae* pursuant to Federal Rule of Appellate Procedure 29).

District courts have wide discretion to grant leave to participate as *amici curiae*. *See, e.g., Hoptowit v. Ray*, 682 F.2d 1237, 1260 (9th Cir. 1982), *abrogated on other grounds by Sandin v. Conner*, 515 U.S. 472 (1995). As this Court has recognized, “[d]istrict courts frequently welcome *amicus* briefs from non-parties concerning legal issues that have potential ramifications beyond the parties directly involved.” *NGV Gaming, Ltd. v. Upstream Point Molate, LLC*, 355 F. Supp. 2d 1061, 1067 (N.D. Cal. 2005). Here, the views of the proposed *amici curiae* are likely to

assist the Court because this group of law firms and lawyers, and their respective constituent clients, have an overriding and abiding interest in the issues presented. *See, e.g., Funbus Sys., Inc. v. State of Cal. Pub. Utilities Comm'n.*, 801 F.2d 1120, 1125 (9th Cir. 1986) (describing the “classic role” of *amici curiae* as “assisting in a case of general public interest”). In particular, proposed *amici*—all of whom are independent of the parties to this action—have extensive and direct experience with the subjects addressed in their *amici curiae* brief and an overriding interest in promoting access to our civil justice system for all individuals injured as a result of exposure to dangerous, cancer-causing chemicals.

In *amici*'s view, the proposed settlement seriously endangers access to justice for millions of people in the proposed class, would prevent Monsanto's victims from holding it accountable, and would reward Monsanto in numerous respects. While there are many problems with the proposed class action settlement, including that most of the proposed class members cannot adequately be notified of its terms, our *amici curiae* brief, short and to the point, focuses on three of them: (1) the wholesale release of punitive damages, (2) the four-year stay on judicial proceedings, and (3) the secret science panel. Each of these violates core principles of America's system of justice—and requires that preliminary approval of the proposed settlement be denied.

There is, moreover, an additional reason our brief should be considered and the proposed settlement should be rejected. If the proposed class action settlement is approved, there is a very real risk that corporations injuring people nationwide will try to use the approach taken in this settlement as a template for future mass tort and personal injury cases, including toxic tort, medical device, pharmaceutical, and product liability cases. Injury victims' right to seek and obtain justice in our nation's courts could be replaced by private deals worked out between

corporate wrongdoers and their selected class counsel. If America's civil justice system is to be a system of justice, that cannot be how it works.

For these reasons, *amici* respectfully request this Court's leave to submit the attached brief *amici curiae* and to participate in any oral argument over the proposed settlement's propriety.

Dated: March 5, 2021

Respectfully submitted,

/s/ Arthur H. Bryant

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Counsel for Amici Curiae

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2021, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

Dated: March 5, 2021

Respectfully submitted,

/s/ Arthur H. Bryant

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Counsel for Amici Curiae

**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. 3:16-md-02741-VC

**OPPOSITION OF 93 LAW FIRMS
AND 167 LAWYERS AS AMICI
CURIAE TO 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**

The Honorable Vince Chhabria

Date: March 31, 2021

Time: 10:00 am

Courtroom 4 – 17th Floor

Last July, this Court described Monsanto’s first proposed Roundup “futures” class settlement (“Plan A”) as “questionable,” not “appropriate,” and “dubious,” articulating several specific “concerns” making the Court “skeptical” of the settlement’s “propriety and fairness”—and thus of why any “potential class member” would “want” to be part of it:

[I]t’s unclear how the [settlement] . . . would benefit a class of Roundup users who either have cancer but have not yet sued Monsanto or have not yet developed cancer . . .

Why would a potential class member want to replace a jury trial and the right to seek punitive damages with the process contemplated by the settlement agreement?

In any area where the science may be evolving, how could it be appropriate to lock in a decision from a panel of scientists for all future cases? . . .

Given the diffuse, contingent, and indeterminate nature of the proposed class, it seems unlikely that most class members would have an opportunity to consider in a meaningful way (if at all) whether it is in their best interest to join the class. . . . For example, the idea that a migrant farmworker or someone who is employed part time by a small gardening business would receive proper notification (much less the opportunity to consider their options in a meaningful way) is dubious.

Doc. 11182 at 3. In light of this rebuke, Monsanto and putative class counsel promptly withdrew Plan A.

Now they are back with “Plan B”—but little has changed. Although some proposed terms have been tweaked, the major components that drew this Court’s skepticism—lack of meaningful notice, the waiver of punitive damages, and the formation of a secret science panel—remain intact. To those exposed to Roundup, “Plan B” is a solution in search of a problem. The only purported benefit being offered is an administrative system whereby putative class members can submit their case to a claims administrator and be provided an offer. However, there is nothing stopping Monsanto from doing that, by itself, today. There is no need for judicial imprimatur, much less for this class to be certified.

Amici Curiae are 93 law firms and 167 lawyers that write collectively from their long and

varied experience representing people injured physically, emotionally, or financially by the conduct of others.¹ This collective experience gives *amici* meaningful perspective on the best ways that our clients and other injury victims can engage with the judicial system. To us, it is clear that the proposed settlement before this Court would not benefit the injured class members. Nor would this type of “settlement” benefit people injured by widespread corporate misconduct in any of the areas of law in which we practice.

We briefly discuss just a few of the settlement’s serious problems below.

Wholesale Release of Punitive Damages: The settlement gives up all of the class members’ punitive damages claims. The sole justification provided for this is that Monsanto has been “punished” and “deterred” enough by the payment of up to \$9,600,000,000 in settlements.² Under no federal or state law, however, does a calculation exist to justify barring an individual from asking that the perpetrator of her or his injuries be punished in this way. In fact, no federal or state law permits *any* injury victim to be barred from seeking punitive damages because a wrongdoer reached settlements with others—or, for that matter, paid compensatory or punitive damages to others, which must be limited to amounts appropriate for the harm the wrongdoer did to *those individuals*. Moreover, Monsanto has continued to manufacture its product in spite of the cancer it was causing, continued to manufacture and sell its product after these verdicts, and, as part of this “settlement,” will be permitted to continue to manufacture its dangerous product

¹ A list of the law firms is attached as Exhibit A. A list of the lawyers is attached as Exhibit B.

² There have also been three punitive damages awards. *See Hardeman v. Monsanto Co.*, 385 F. Supp. 3d 1042, 1048 (N.D. Cal. 2019) (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) (punitive damages reduced from \$250 million to \$39.25 million); *Johnson*, 52 Cal. App. 5th 454, 463 (2020) (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) (punitive damages for two plaintiffs reduced from \$1 billion each to \$24.5 million and \$44.8 million). *Hardeman* and *Pilliod* are on appeal.

unabated long into the future—all while class members and other members of the public will continue to be exposed.³ This is neither punishment nor deterrence. It is an unconscionable gift to Monsanto.

A Four-Year Stay on Judicial Proceedings: The settlement stays all litigation for class members for four years. This is anathema to the effective representation of injured individuals. Why should people wait four years to be able to file a lawsuit, and then, with the congestion of courts, another three to five years before a trial? In those four years and the later intervening time, no doubt people will die, many as a result of the cancer that Monsanto gave them, and potentially lose their rights to some causes of action and/or measures of damages. Recognizing this, many courts, as in California's CCP36, *expedite* hearings so such individuals will not have to wait. The proposed settlement, in contrast, *delays* their hearings. In these cases, justice delayed will truly be justice denied. Why should injured victims be deprived of the relief that they so urgently need? Such a stay is unprecedented in our jurisprudence. It should not be countenanced by this or any other court in any litigation involving injured individuals.

A Secret Science Panel: The ostensible justification for a four-year stay is the formation of a science panel. The premise for this panel of scientists, constructed to exclude anyone in the world who has already researched the product and found it in any way dangerous, is that it will operate in total darkness, its work hidden, its process hidden, and its members only subject to a single carefully controlled deposition. Its conclusions will then be presented to juries as “stipulated facts” from an “independent” panel. Regardless of the weight juries and other judges will give this, why is this something that is advantageous to victims? Which plaintiff in any

³ Without going into detail, in *In Re: Diet Drugs (Phentermine/Fenfluramine/Dexenfluramine) Prods. Liab. Litig.*, 369 F.3d 293, 317 (3d Cir. 2004), the lead case relied on in the Motion for Preliminary Approval, Doc. 12509 at 13 n.1, the offending product had long been off the market and its use was by prescription.

litigation has ever requested such a panel? Our court systems are public for a reason. Factual determinations should never be made in secret by a private group, not subject to review or cross-examination. Any secret, private expert panel desecrates the openness and transparency of the legal process—and eviscerates the right to trial by jury. It violates a core principle at the heart of our common law system: that juries and (in appropriate circumstances) judges decide critical issues of fact.

In conclusion, we believe that this proposed settlement will not benefit injured Roundup victims, but, instead, will merely allow Monsanto to cap its risk and calculate the injuries and suffering it has caused, is causing, and will continue to cause as just one more cost of doing business. People exposed to dangerous products should not be forced, generally unknowingly, to give up rights that they otherwise would have. It is not the judicial system's job to allow Monsanto to continue to manufacture its product and be able to calculate its potential risk. The judicial system should *prevent* such an outcome, not bless it. Its job is to give aggrieved parties the opportunity to make themselves whole, seek recompense for their injuries, and, when harmed by malicious conduct, punish the party who hurt them.

We, therefore, respectfully submit that this Court should deny approval of this repackaged class settlement. Such a settlement should never be approved.

Dated: March 5, 2021

Respectfully submitted,

/s/ Arthur H. Bryant

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Dated: March 5, 2021

Respectfully submitted,

/s/ Arthur H. Bryant
Arthur H. Bryant (SBN 208365)

EXHIBIT

A

Ramirez v. Monsanto Co.**Law Firms Opposing Proposed Settlement as *Amici Curiae***

Name	Location
Bailey & Glasser, LLP	Charleston, WV
Bailey Cowan Heckaman	Houston, TX
Baron and Blue	Dallas, TX
Baston Law, P.C.	Dallas, TX
Belluck & Fox	New York, NY
Bergman Draper Oslund	Seattle, WA
Bernstein Liebhard, LLP	New York, NY
Bisnar Chase	Newport Beach, CA
Brayton Purcell, LLP	Novato, CA
Brown Kiely, LLP	Bethesda, MD
Bush & Miller, Attys at Law P	College Pk, GA
Cappolino, Dodd & Krebs LLP	Temple, TX
Carichoff Law Group PC	Folsom, CA
Chandler, McNulty	Houston, TX
Charles G. Monnett III & Associates	Charlotte, NC
Cooper Elliott	Columbus OH
Danziger & De Llano, LLP	Houston, TX
DelHomme & Associates	Dallas, TX
Early, Lucarelli, Sweeney & Meisenkothe, LLC	New Haven, CT
Elrod Pope Law Firm	Rock Hill, SC
Fears Nachawati, PLLC	Dallas, TX
Forester Haynie	Dallas, TX
Frost Law Firm, PC	San Pedro, CA
Galiher, DeRobertis & Waxman	Honolulu, HI
Goldberg Persky & White	Pittsburgh, PA
Handley Law Center	El Reno, OK
Harowitz & Tigerman, LLP	Pacific, CA
Hart Law Firm	Summerville, SC
Hendler Flores Law, PLLC	Austin, TX
Herren Law, PLLC	Lexington, KY
Humphry Law Firm, P.C.	Des Moines, IA
Jernigan Law Firm	Raleigh, NC
John Michael Bailey Injury Lawyers	Memphis, TN
Jones Ward PLC	Louisville, KY
Kaiser Gornick LLP	Alamo, CA
Kazan, McClain, Satterley & Greenwood	Oakland, CA
Kohn Law Office	Oceanside, CA
Landry & Swarr	New Orleans, LA
Lane & Lane, LLC	Chicago, IL
Law Offices of DOBS	Dallas, TX

Name	Location
Law Offices of G. Oliver Koppell & Associates	New York, NY
Law Offices of Mary Alice McLarty	Dallas, TX
Law Offices of Mitchell J. Howie	Huntsville, AL
Law Offices of Ralph Dowden	Clovis, NM
Law Offices of Sean R. Cox	Dallas, TX
Legally Pink Law	Winter Park, FL
Levy Law Firm	New York, NY
Littlepage Booth Leckman	Houston, TX
Locks Law Firm	Philadelphia, PA
Lubel Voyles LLP	Houston, TX
Madeksho Law Firm	Woodland Hills, CA
Martzell, Bickford and Centola	New Orleans, LA
Maune Raichle Hartley French & Mudd	Portland, OR
McDermott & Hickey	Rocky River, OH
McRae Law Firm	Jackson, MS
Meirowitz & Wasserberg, LLP	New York, NY
Moody Law	Little Rock, AR
Morris Law Firm	Burbank, CA
Nass Cancelliere	Philadelphia, PA
Nemeroff Law Firm	Park City, UT
Patten, Wornom, Hatten & Diamonstein, LC	Newport News, VA
Pearce Lewis LLP	San Francisco, CA
Penner Law	Lafayette, LA
Phillip S. Georges, PLLC	Nashville, TN
Richardson Richardson Boudreaux	Tulsa, OK
Richmond Vona, LLC	Buffalo, NY
Rogers, Patrick, Westbrook & Brickman, LLC	Aiken, SC
Savinis, Kane & Galluci, LLC	Pittsburgh, PA
Serling & Abramson, P.C.	Birmingham, MI
Shepard Law, P.C.	Boston, MA
Shingler Law	Walnut Creek, CA
Simmons, Hanly, Conroy	San Francisco, CA
Simon Greenstone Panatier	Dallas, TX
Skolnick Law	Oceanside, CA
Smith LaCien, LLP	Chicago, IL
Stuemke Law Firm	Southlake, TX
The Barnes Firm	Oakland, CA
The Cheek Law Firm	New Orleans, LA
The Ferraro Law Firm	Miami, FL
The Kirbo Law Firm	Moultrie, GA
The Law Offices of Vic Feazell	Waco, TX
The Lovely Law Firm	Myrtle Beach, SC
The Mellino Law Firm, LLC	Rocky River, Ohio

Name	Location
The Paul Law Firm	Westlake Village, CA
The Phillips Law Firm	San Antonio, TX
Walker, Hamilton & Koenig, LLP	San Francisco, CA
Wallace & Graham, P.A.	Salisbury, NC
Waters Kraus	Dallas, TX
Worthington & Caron	San Pedro, CA
Wright & Schulte, LLC	Vandalia, OH
Zaytoun, Ballew, & Taylor	Raleigh, NC
Zelbst, Homes & Butler	Lawton, OK
Zinns Law, LLC	Atlanta, GA

EXHIBIT

B

*Ramirez v. Monsanto Co.***Lawyers Opposing Proposed Settlement as *Amici Curiae***

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Eric Abramson	Birmingham, MI
Raymond S. Allred	Tulsa, OK
Dave Amell	Emeryville, CA
Michael Angelides	San Francisco, CA
Tom Antunovich	Newport Beach, CA
Ron Archer	San Pedro, CA
Benjamin L. Bailey	Charleston, WV
John Michael Bailey	Memphis, TN
Valerie D. Baston	Dallas, TX
Kelly Battley	Portland, OR
Joe Belluck	New York, NY
Rett D.B. Bergmark	Oakland, CA
Dawn Besserman	Tampa, FL
Scott Bickford	New Orleans, LA
Michael J. Blom	New York, NY
Lisa Blue	Dallas, TX
Justin Bosl	Oakland, CA
Trey Branham	Dallas, TX
Alan Brayton	Novato, CA
Gary L. Brayton	Novato, CA
Daniel A. Brown	Bethesda, MD
Arthur H. Bryant	Oakland, CA
J. David Butler	Aiken, SC
Joshua D. Cagle	Mount Pleasant, SC
James Campbell	St. Louis, MO
Michael Cancelliere	Philadelphia, PA
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John M. Caron	San Pedro, CA
James Catazaro	Waco, TX
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Troy D. Chandler	Houston, TX
Brian D. Chase	Newport Beach, CA
Lindsey A. Cheek	New Orleans, LA
Andrew Chew	Novato, CA
Kimberly Chu	Novato, CA
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Hugh C. Cook	Novato, CA

Name	Location
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Beverly A. DelHomme	Dallas, TX
David R. Donadio	Novato, CA
Ralph Dowden	Clovis, NM
Andrew DuPont	Philadelphia, PA
Morris Dweck	New York, NY
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Brian Glasser	Washington, DC
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Gordon Greenwood	Oakland, CA
Carlos Guzman	Emeryville, CA
Joshua I. Hammack	Washington, DC
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Christian Hartley	Mt. Pleasant, SC
William W.C. Harty	Newport News, VA
Matthew Haynie	New York, NY
Scott Hendler	Austin, TX
Curt F. Hennecke	Novato, CA
Thomas K. Herren	Lexington, KY
Christopher J. Hickey	Rocky River, OH
Brandy A. Hillman-Azevedo	Novato, CA
Philip C. Hoffman	New Orleans, LA
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Jeffrey A. Kaiser	Alamo, CA
John R. Kane	Pittsburgh, PA
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Cliff Kirbo	Moultrie, GA
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Mickey Landry	New Orleans, LA
Scott D. Lane	Chicago, IL
Stephen I. Lane	Chicago, IL
John Langdoc	Oakland, CA
Jack G. Leader	Rock Hill, SC
Bryn G. Letsch	Novato, CA
Zoe Littlepage	Houston, TX
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Angela Madeksho	Woodland Hills, CA
Christopher L. Madeksho	Woodland Hills, CA
John P. Mason	Novato, CA
Bruce E. Mattock	Pittsburgh, PA
Neil Maune	St. Louis, MO
David McClain	Oakland, CA
Darren McDowell	Dallas, TX
Mary Alice McLarty	Dallas, TX
Chuck McRae	Jackson, MS
Samuel Meirowitz	New York, NY
Chris Meisenkothen	New Haven, CT
Christopher M. Mellino	Rocky River, OH
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Edward Nass	Philadelphia, PA
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Chris Panatier	Dallas, TX
Michael B. Patronella	Houston, TX
Steven J. Patti	Novato, CA
Jerry Neil Paul	Westlake Village, CA
Timothy F. Pearce	San Francisco, CA
D'Ann "Dee" Penner	Lafayette, LA
R. Bruce Phillips	San Antonio, TX
E. Thomas Pinnell	Mount Pleasant, SC
Brenda D. Posada	Novato, CA
Gilbert L. Purcell	Novato, CA
Marcus Raichle	St. Louis, MO
Randy Reagan	Houston, TX
Christine A. Renken	Novato, CA
Steve Rineberg	St. Louis, MO
Jason M. Rose	Novato, CA
Will Ruiz	Emeryville, CA
Carolyn Salzmann	Winter Park, FL
Joseph D. Satterley	Oakland, CA
Ann Saucer	Dallas, TX
Steve Schulte	Dallas, TX
Autumn A. Sepulveda	Emeryville, CA
Michael Shepard	Boston, MA
Ron Shingler	Walnut Creek, CA
Richard W. Shulte	Vandalia, OH
Jeffrey B. Simon	Dallas, TX
Suzanne Skolnick	Oceanside, CA
Geoff T. Sloniker	Novato, CA
Todd Smith	Chicago, IL
Eric C. Solomon	Novato, CA
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Frank J. Swarr	New Orleans, LA
Clay Thompson	St. Louis, MO
Lin Thunder	Portland, OR
Stephen Tigerman	Pacific, CA
Keith R. Vona	Buffalo, NY
Betty B. Walker	College Pk, GA
Walter "Skip" H. Walker III	San Francisco, CA
Mona Lisa Wallace	Salisbury, NC

Name	Location
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Ilana K. Waxman	Honolulu, HI
Nancy T. Williams	Novato, CA
Kenneth J. Wilson	Aiken, SC
Roger G. Worthington	San Pedro, CA
Jason Yampolsky	Philadelphia, PA
Robert Zaytoun	Raleigh, NC
John P. Zelbst	Lawton, OK
Sharon J. Zinns	Atlanta, GA

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:

Ramirez, et al. v. Monsanto Co.,

**[PROPOSED] ORDER GRANTING
MOTION FOR LEAVE TO FILE
OPPOSITION OF 93 LAW FIRMS AND
167 LAWYERS AS *AMICI CURIAE* TO
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**

The Motion for Leave to File Opposition of 93 Law Firms and 167 Lawyers as *Amici Curiae* to 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 is **GRANTED**.

IT IS SO ORDERED.

Dated: March __, 2021

Vince Chhabria
United States District Judge