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:) [PROPOSED] ORDER GRANTING) JOINT PROPOSAL FOR REVISED
ALL ACTIONS) SCHEDULE FOR WAVE 2 CASES
) AS MODIFIED
)
)

THIS MATTER came before the Court based on the Court's order for a revised schedule for Wave 2 cases. Having reviewed the proposed schedule and finding good cause shown, the Court GRANTS the parties' proposed schedule for Wave 2 cases, as detailed below.

Wave 2 Schedule:

Event	Date
Plaintiff Fact Sheets (including all relevant authorizations) due for any plaintiffs who have not yet provided them.	No change
Each plaintiff will provide any medical records in his/her possession and/or his/her counsel's possession to defense counsel.	No change
Deficiency letter(s) sent.	No change
Deadline to cure Plaintiff Fact Sheet deficiencies. The parties may file a consolidated letter brief regarding any disputes about whether a deficiency exists.	No change
Close of fact discovery.	1/15/2021
Plaintiffs' expert reports due.	1/22/2021
The parties should file a letter brief identifying any disputes over the applicable state law for the wave 3 cases. For cases where that is undisputed, the parties should file a stipulation identifying the governing state	2/5/2021
Monsanto's expert reports due.	2/12/2021
Close of expert discovery.	3/10/2021
Monsanto's Daubert and summary judgment briefs due.	3/19/2021
Plaintiffs' opposition and cross-motions re: Daubert and summary judgment due.	4/2/2021

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Monsanto's oppositions and replies re: <i>Daubert</i> and summary judgment due.	4/16/2021
Plaintiffs' replies re: Daubert and summary judgment due.	4/30/2021
Daubert hearing (if necessary).	5/28/2021

Date: December 9, 2020

