

1 **ANDRUS WAGSTAFF, PC**
Aimee H. Wagstaff (SBN 278480)
2 Aimee.wagstaff@andruswagstaff.com
7171 W. Alaska Drive
3 Lakewood, Colorado 80226
Telephone: 303-376-6360
4

5 Attorney for Plaintiffs

6 **UNITED STATES DISTRICT COURT**
7 **NORTHERN DISTRICT OF CALIFORNIA**

8 IN RE: ROUNDUP PRODUCTS) MDL No. 2741
LIABILITY LITIGATION)
9) Case No. 16-md-02741-VC
)

10 _____)
11 This document relates to:)

12 ***ALL ACTIONS***)

**DECLARATION OF AIMEE WAGSTAFF
IN SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL LETTER TO HON. JUDGE
VINCE CHHABRIA**

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17 _____)
18 I, Aimee H. Wagstaff, declare and state as follows:

19 1. I am an attorney duly admitted to practice before this Court. I am a partner with
20 Andrus Wagstaff, PC, attorneys of record for Plaintiffs. I submit this Declaration in support of
21 Plaintiffs' Administrative Motion to File Under Seal pursuant to the August 31, 2020 Minute Entry
22 for proceedings held before Judge Vince Chhabria: Further Case Management Conference
23 held via Zoom on 8/27/2020.

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25 2. On August 20, 2020 Andrus Wagstaff submitted the attached response to Pretrial
26 Order No. 216 by email submission to the court. *See Exhibit A.* Undersigned counsel conferred
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1 with Counsel for Monsanto and redacted the Letter of confidential settlement related information
2 pursuant to the August Minute Order.

3 3. Of note, since Andrus Wagstaff submitted the response letter to the court on August
4 20, 2020 Monsanto has executed a binding master settlement agreement that allows Andrus
5 Wagstaff's clients to participate in a private settlement program.
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7 I declare under penalty of perjury that the foregoing is true and correct.
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10 DATED: September 14, 2020

Respectfully submitted,

11 By: /s/ Aimee H. Wagstaff
12 Aimee H. Wagstaff, Esq.
13 **ANDRUS WAGSTAFF, PC**
14 7171 W. Alaska Dr.
15 Lakewood, CO 80226
16 Phone: (866) 795-9529
17 Aimee.wagstaff@andruswagstaff.com
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CERTIFICATE OF SERVICE

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2 I HEREBY CERTIFY that on this 14th day of September 2020, a copy of the foregoing was
3 filed with the Clerk of the Court through the CM/ECF system which sent notice of the filing to all
4 appearing parties of record.
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7 /s/ Aimee H. Wagstaff
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