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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: ROUNDUP PRODUCTS  
LIABILITY LITIGATION

MDL No. 2741  
Case No. 16-md-02741-VC

Hon. Vince Chhabria

This document relates to:  
ALL ACTIONS

**JOINT CASE MANAGEMENT STATEMENT**

Plaintiffs’ leadership and Monsanto’s counsel hereby provide the following updates to the Court. The parties do not believe a Case Management Conference is necessary at this juncture but are happy to appear at the Court’s convenience.

**I. Update on Status of Motions to Dismiss**

Monsanto filed a motion to dismiss *pro se* Wave IV plaintiff John Adams on April 1, 2022. (Dkt. No. 14715). The Court previously instructed Mr. Adams to notify the Court by December 14, 2021 via letter if Mr. Adams wanted to pursue his case *pro se*. No letter was ever filed by Mr. Adams and his case should be dismissed.

In the Wave IV lawsuit filed by *pro se* plaintiff Ralph Applegate, *Ralph Applegate v. Bayer AG*, Case No. 3:19-cv-06800-VC, Bayer AG filed a Motion for Judgment on the Pleadings on January 10, 2022 (Dkt. No. 14461) for lack of proper service and, in the alternative, lack of personal jurisdiction. Briefing is complete on Bayer AG’s motion and can be ruled on at the Court’s convenience.

**II. Inactive Docket Overview**

Pursuant to PTO 246, Monsanto is filing along with this case management statement a list of new cases that should be added to the inactive docket since the last submission (Exhibit A). Monsanto is also filing a list of cases on the inactive docket that should be returned to active status (Exhibit B). The parties are not aware of any cases on the inactive docket that can be dismissed with prejudice.

1 In summary, since the Court entered PTO 246 establishing the inactive docket, the parties have  
2 agreed that 3,154 cases, involving 3,212 plaintiffs, can be moved to the inactive docket and  
3 administratively closed. 865 cases remain active in the MDL.  
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7 DATED: April 13, 2022

Respectfully submitted,

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*MONSANTO COMPANY*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13th day of April, 2022, 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.

By: /s/ Brian L. Stekloff

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