

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL No. 2741

Case No. 16-md-02741-VC

This document relates to:

Hardeman v. Monsanto, 3:16-cv-00525-VC

**PRETRIAL ORDER NO. 133:
COURT'S PROPOSED VERDICT FORM**

The parties should be prepared to discuss the proposed verdict form on Monday afternoon. The parties are responsible for bringing to the Court's attention any objections they have to the structure or content of the verdict form.

IT IS SO ORDERED.

Date: March 25, 2019



Honorable Vince Chhabria
United States District Court

After you have reached your verdict, please fill out this form. After you have completed the form, let the Courtroom Deputy know that you have reached a verdict, without saying what the verdict is. The presiding juror should keep the form and bring it into the courtroom so that the jury may announce the verdict.

Question 1: Did Mr. Hardeman prove by a preponderance of the evidence his claim that Roundup's design was defective? See Instruction Number 11.

Yes: _____ No: _____

Question 2: Did Mr. Hardeman prove by a preponderance of the evidence his claim that Roundup lacked sufficient warnings of potential risks? See Instruction Number 12.

Yes: _____ No: _____

Question 3: Did Mr. Hardeman prove by a preponderance of the evidence his claim that Monsanto was negligent by not using reasonable care to warn about Roundup's cancer risk? See Instruction Number 13.

Yes: _____ No: _____

If you answered "no" to all three questions above, please stop, sign the verdict form, and inform the Courtroom Deputy that you have reached a verdict. If you answered "yes" to one or more of the questions above, then please continue.

Question 4: What are Mr. Hardeman's compensatory damages? See Instruction Number 15.

Past economic loss: \$ 200,967.10

Past noneconomic loss: \$ _____

Future noneconomic loss: \$ _____

Question 5: Did Mr. Hardeman prove by clear and convincing evidence that he is entitled to punitive damages based on Monsanto's conduct during the time Mr. Hardeman was using Roundup? See Instruction Number 16.

Yes: _____ No: _____

Question 6: If you answered "yes" to the previous question, what amount do you award Mr. Hardeman in punitive damages?

\$ _____

Dated:

Presiding Juror