

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

This document relates to:
ALL ACTIONS

MDL No. 2741

Case No. 16-md-02741-VC

**PRETRIAL ORDER NO. 70:
FINAL JUROR QUESTIONNAIRE**

The final juror questionnaire for the Group 1 bellwether trials is attached to this order.

IT IS SO ORDERED.

Date: February 5, 2019



Honorable Vince Chhabria
United States District Court

JUROR QUESTIONNAIRE

You are being considered for a jury for a case titled *In re: Roundup Products Liability Litigation*. The plaintiff in this lawsuit is a 70-year old man named Edwin Hardeman. Mr. Hardeman is suing the company Monsanto because he believes that his use of the Monsanto weedkiller "Roundup" caused him to develop a form of cancer called non-Hodgkin's Lymphoma. Monsanto disputes this claim.

Please complete the following questionnaire to assist the attorneys and me in selecting a jury to serve in this case. Using the questionnaire helps us ask fewer questions in court.

Please complete this form honestly, completely, and with great care. There are no right or wrong answers. The responses will be reviewed only for the purpose of selecting a jury.

Beginning immediately, you are ordered not to discuss this case or questionnaire with anyone, including your family, friends, and fellow prospective jurors. Do not email, blog, tweet, text, or post about the questionnaire or trial. Do not do any internet or other research, such as searching for information about the case or any of the people involved. Do not read, listen to, or watch any news reports about this case or any of the people involved.

While some of the questions may seem very personal, I have reviewed them carefully and determined that they are relevant to the issues in this case. The questions are not meant to invade your privacy but to help select a fair jury. If there is sensitive personal information that you prefer not to discuss in front of other jurors, please write "PRIVATE" next to your answer to that question, but please still answer the question. If the attorneys need to follow up with you about a private response, the attorneys and I will speak with you about that response outside the presence of the other jurors.

Please write clearly, and do not leave any questions blank. If a question does not apply to you, write "N/A" (for "not applicable"), rather than leaving the response blank. If you do not understand the question or do not know the answer, please write that in the space provided. If you need more space for a response or want to make further comments about any question, please use the extra sheets attached to the back of the questionnaire. Do not write on the back of any page. If you use the explanation sheets, please be sure to indicate which numbered question you are answering.

You are expected to sign the questionnaire, and your answers will be treated the same way as if they were made in court under oath.

Thank you for your cooperation.



Vince Chhabria
United States District Judge

Juror Number [Jury Office Use Only]: _____

1. Name: _____
Last Name First Name Middle Name

2. Do you have any trouble understanding or communicating in English?
Yes ____ No ____
If yes, please explain:

3. Jury selection in this case will start at 7:30 a.m. on Wednesday, February 20, 2019, and will last most of the day. The trial will begin on February 25, 2019, and will last approximately 4 weeks, at which point the jury will begin deliberating. Trial begins each day at 8:30 a.m. and finishes between 2:00 and 2:30 p.m. Trial takes place four days out of the week – there is no trial on Thursdays. Do you have any serious scheduling issues or hardships that prevent you from serving as a juror in this case (such as prepaid travel plans, medical issues, financial concerns, or family responsibilities)? Keep in mind that if you are unable to serve in this trial, you could be placed on another trial later this year.
Yes ____ No ____
If yes, please explain:

4. Date of Birth: _____ Age: _____ Place of Birth: _____

5. Gender: _____

6. What city and neighborhood do you live in? _____
How long have you lived there? _____

7. Do you own or rent your place of residence? Own ____ Rent ____ Other _____

8. If you have lived in any other neighborhoods/areas during the past 10 years, please list those neighborhoods.

9. Describe your educational background:

Major Area(s) of Study: _____
Degree(s)/Certificate(s): _____

10. What is your current employment status? (Check all that apply.)

- | | |
|--|------------------------------------|
| <input type="checkbox"/> Working Full-Time | <input type="checkbox"/> Disabled |
| <input type="checkbox"/> Working Part-Time | <input type="checkbox"/> Homemaker |
| <input type="checkbox"/> Unemployed | <input type="checkbox"/> Retired |
| <input type="checkbox"/> Full-Time Student | <input type="checkbox"/> Other |
| <input type="checkbox"/> Part-Time Student | |

11. Please list all of the jobs that you have had in the past five years, starting with your most recent job.

Occupation	Employer	Dates of Employment	Job Description

12. If applicable, what is the occupation of your spouse or significant other and who is his/her employer?

13. If you have any children, please provide their gender, age, and occupation.

Gender	Age	Occupation	Employer

14. Please provide the following information for any other adults living with you:

Relationship to You	Gender	Occupation	Employer

15. Do you, or does a family member or anyone close to you, have any training, experience or expertise in the following areas? Please check all that apply.

- | | | | |
|------------------------------|------------------------------------|--------------------------------------|---|
| Agriculture/Farming | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Biology | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Chemistry | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Chemical Engineering | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Environmental Science | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Epidemiology | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Government/Regulatory Agency | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Law/Legal Field | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Medicine/Nursing/Health Care | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Marketing | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Public Relations | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Risk Assessment | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Statistics | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |
| Toxicology | <input type="checkbox"/> Yes, self | <input type="checkbox"/> Yes, family | <input type="checkbox"/> Yes, someone close |

If you answered yes to any of the above, please describe:

16. Have you ever served on a jury before? Yes _____ No _____ If yes, please list:

Federal Court or State/County Court?	Approximately When?	Criminal or Civil Trial?	Verdict Reached?	Were you the Foreperson?
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

17. Have you or has anyone close to you ever had cancer?

_____ Yes, I have _____ Yes, someone close to me has _____ No

If yes:

a) Who is the person? _____

b) What type of cancer(s)? _____

c) What is the current status of the cancer? _____

d) Do you believe you can fairly evaluate the evidence in a trial where one party has cancer and is alleging that it was caused by the other party?

Yes _____ No _____

If no, please explain:

18. Have you or has anyone close to you experienced side effects from exposure to a chemical? If yes, please explain, including who, when, what chemical, and what the side effects were.

19. Have you ever heard of Monsanto?

Yes _____ No _____

20. Have you or has anyone close to you ever worked for, done business with, or otherwise had a financial interest in Monsanto? Yes _____ No _____

If yes, please explain:

21. Have you heard, read or seen any news reports about Monsanto?

Yes ____ No ____

If yes, please describe them to the best of your recollection:

22. Have you heard, read, or seen anything about a recent trial in San Francisco involving Monsanto?

Yes ____ No ____

If yes:

(a) Do you know the outcome of the trial? Yes ____ No ____

(b) If you answered yes to (a), please write down everything you remember about the outcome:

(c) Please write down anything else you remember about what you heard, read, or saw:

23. Do you have any opinions or feelings about Monsanto, or any chemical company, that may make it difficult for you to fairly evaluate the evidence in a trial where an individual is claiming that the company's product caused their cancer?

Yes ____ No ____

If yes, please explain:

24. Before today, have you heard, read, or seen any news reports concerning this lawsuit, *In re: Roundup Products Liability Litigation: Hardeman v. Monsanto?*

Yes ____ No ____

If yes, please explain what you have heard, read, or seen:

25. Before today, have you heard, read, or seen anything about the product Roundup?

Yes ____ No ____

If yes, please explain what you have heard, read, or seen:

26. Do you or does anyone close to you currently use the herbicide (weed killer) sold under the brand name "Roundup"?

Yes ____ No ____

If yes, please explain:

Who/Relationship to You	Where?	Purpose(s) of Use?	How Often?

27. Have you or has anyone close to you regularly used the herbicide Roundup in the past?

Yes ____ No ____

If yes, please explain:

Who/Relationship to You	Where?	Purpose(s) of Use?	How Often?	When?

28. Do you have any opinions about awarding money damages in a personal injury lawsuit to compensate someone for mental suffering, emotional distress, and loss of enjoyment of life?

Yes ____ No ____

If yes, please explain:

29. Punitive damages are awarded against a company or individual to punish bad conduct and prevent future bad conduct. Do you have any opinions about awarding punitive damages in a lawsuit?

Yes ____ No ____

If yes, please explain:

30. Is there any information that you have not been asked that you feel the Court should know or that might be relevant in any way to this trial or to your potential service? If it is something personal or private, please write "PRIVATE" next to your answer so that you may be questioned about it privately, rather than in open court.

Yes ____ No ____

If yes, please explain:

31. A list of names is attached to this questionnaire. Please circle the names of any of the people that you think you might personally know, and provide an explanation here:

32. Please complete the Juror's Oath below.

JUROR'S OATH

I declare under penalty of perjury that the answers in this Juror Questionnaire are true and correct to the best of my knowledge and belief.

Juror Signature: _____

Juror Name (Print): _____

Date: _____

