1 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
2 _____
3 IN RE: ROUNDUP PRODUCTS MDL No. 2741
LIABILITY LITIGATION Case No. 16-md-02741-VC
4 _____
5 This document relates to:
6 ALL ACTIONS
_____
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11 VIDEOTAPED DEPOSITION OF CHARLES W. JAMESON
12 Fort Myers, Florida
13 Wednesday, May 3, 2017
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22 Reported by:
23 DONALD R. DePEW, RPR, CRR, FPR
24 JOB NO. 123274
25

May 3, 2017
8:37 a.m.

Videotaped Deposition of CHARLES W. JAMESON, held at the law offices of Morgan & Morgan, PA, 12800 University Drive, Fort Myers, Florida, before Donald R. DePew, a Registered Professional Reporter, Certified Realtime Reporter, Florida Professional Reporter, and Notary Public of the State of Florida at Large.

APPEARANCES:

ANDRUS WAGSTAFF
Attorneys for Plaintiffs
7171 West Alaska Drive
Lakewood, Colorado 80226
BY: KATHRYN FORGIE, ESQ.
DAVID WOOL, ESQ. (via phone)

HOLLINGSWORTH
Attorneys for Defendant Monsanto Company
1350 I Street, N.W.
Washington, DC 20005
BY: ERIC LASKER, ESQ.

JOHN KALAS, ESQ.

LAW OFFICE OF SHARON M. HANLON
Attorneys for the Witness
Edgemont Office Park
5633 Naples Boulevard
Naples, Florida 34109-2023
BY: SHARON HANLON, ESQ.

ALSO PRESENT:
KELLIE JOHNSON, Paralegal, Andrus Wagstaff
JEFF MENTON, Videographer

THE VIDEOGRAPHER: This is the start of video media disk 1 of the videotaped deposition of Charles W. Jameson, a Ph.D.

Please note the microphones are very sensitive. Be aware that they can pick up whispering and conversations not intended for the record.

Additionally, please turn off your cell phones or place them away from the microphones, they can interfere.

This is the matter of In Re: Roundup Products Liability Litigation, in the United States District Court, Northern District of California, Case No. 16-md-02741-VC.

This deposition is being held at the offices of Morgan & Morgan at 12800 University Drive, Fort Myers, Florida. Today is May the 3rd, 2017. The time is approximately 8:37 a.m.

My name is Jeff Menton, I am the certified legal video specialist from TSG Reporting. We are headquartered at 747 Third Avenue, New York.

The court reporter is Don DePew, also

in association with TSG Reporting.

Would counsel please introduce yourselves and state whom you represent starting with the noticing attorney, and then will the court reporter please swear the witness in.

MR. LASKER: This is Eric Lasker on behalf of Monsanto Company.

MR. KALAS: John Kalas on behalf of Monsanto Company.

MS. HANLON: This is Sharon Hanlon, I am personal counsel with limited appearance on behalf of Dr. Jameson.

MS. FORGIE: Kathryn Forgie of Andrus Wagstaff representing the plaintiffs, and I'm here with Kellie Johnson of my office.

CHARLES W. JAMESON, called as a witness, having been duly sworn by the Notary Public, was examined and testified as follows:

MR. LASKER: And do we have anyone on the phone?

MR. WOOL: This is David Wool of Andrus Wagstaff for the plaintiffs appearing telephonically.

MS. FORGIE: Anyone else?
MR. LASKER: Okay. I understand you have something you want to say on the record.
MS. HANLON: I would.
Thank you.
Good morning.
The first thing I'd like to do is I will produce as Exhibit 12-1 would be my notice of appearance.
This was to be filed last night. It was not, so I'm going to make it a new exhibit and also produce a copy.
It is a Notice of Limited Appearance at the Deposition of Dr. Charles Jameson for purposes of today's factual deposition.
I'd also like to produce the objection to -- Dr. Jameson's Objections and Responses to Monsanto's Notice of Deposition of Dr. Jameson.
I'd like that to be Exhibit 2. It was filed last night.
Just in the event it was not received by everybody I'd like to have it -- make a copy of it. And it is the document that was

produced.
(Exhibit 12-1, One-page document entitled Notice of Limited Appearance at the Deposition of Dr. Charles Jameson, marked for identification, as of this date.)
(Exhibit 12-2, Seven-page document entitled Dr. Jameson's Objections and Responses to Monsanto's Notice of Deposition of Dr. Jameson, marked for identification, as of this date.)
MS. HANLON: I'd also like to produce as 12-3, which will be response No. 1 to the specific objections and responses to document requests, which is a copy of the curriculum vitae for Dr. Jameson.
I have just two copies and I'll give it to each of you.
(Exhibit 12-3, Multipage document entitled C.W. Jameson - Curriculum Vitae and Bibliography, marked for identification, as of this date.)
MS. HANLON: Then Exhibit 12-4, which is a document we are producing that was provided to me this morning by Dr. Jameson.
And it's in response to No. 9, request

No. 9 on the document request for the deposition.
It is a one-page front and back.
MS. FORGIE: This is 12-4?
MS. HANLON: Correct.
MS. FORGIE: Thank you.
(Exhibit 12-4, One-page e-mail chain, first e-mail to Bill Jameson from Neil S. Bromberg, dated 8/10/16, marked for identification, as of this date.)
MS. HANLON: And lastly, I would like to make an objection to this deposition as not being served as according to the Rules 30 and 45 of the Federal Rules of Civil Procedure, as well as Monsanto's notice of deposition, dated 4/24/17.
Dr. Jameson was served approximately 4:00 p.m. last night on 5/2/17. And the notice states that Dr. Jameson shall produce all documents 24 hours prior to the deposition.
And we submit that there was not sufficient time for him to produce all the documents, but we are here voluntarily. We are producing documents, but we do not waive

our objection.
Thank you.
MR. LASKER: And just for the record, in response, Dr. Jameson's deposition is an issue that was addressed by the court following plaintiffs counsel's representation that Dr. Jameson was an expert witness for the plaintiffs in this litigation, that Dr. Jameson had provided documents to plaintiffs counsel in response to the subpoena that we issued back in October --
MR. KALAS: September.
MR. LASKER: -- September of 2016.
And that negotiations for this deposition as to where it would take place and when it would take place were conducted with plaintiffs counsel.
It was not until yesterday that we were advised that Mr. Jameson had separate counsel for this and that plaintiffs counsel in this litigation had not been accepting the notice of deposition for him and were not responding to discovery requests, which is why yesterday we did serve the subpoena.

1 That was the first time we were aware
2 that Dr. Jameson had not already agreed to
3 appear voluntarily.
4 MS. FORGIE: And I -- wait.
5 I have a response to that, and that is
6 that we have always advised defendant's
7 counsel that we do not represent Dr. Jameson
8 personally. I think that's been made clear
9 throughout the litigation.
10 And I have a couple of exhibits I
11 would like to introduce as well.
12 We're on Exhibit 12-5.
13 This is Pretrial Order No. 16, it
14 indicates that drafts or excerpts of drafts
15 are not to be produced.
16 Unfortunately I didn't bring extra
17 copies, but I know you guys have a copier --
18 maybe I do have an extra copy.
19 I have about eight copies, but they're
20 all marked up.
21 There we go.
22 (Exhibit 12-5, One-page document
23 entitled Pretrial Order No. 16: Additional
24 Discovery Re IARC, marked for
25 identification, as of this date.)

1 MS. FORGIE: And then I also want to
2 mark as Exhibit 12-6 the brief letter that
3 was served to the court on April 4th, 2017
4 which discusses the parameters of this
5 deposition, wherein defense counsel stated
6 that "Monsanto requests leave to obtain
7 relevant documents from and depose
8 Dr. Charles Jameson, chair of the
9 experimental animal subgroup, and to depose
10 Dr. Matthew Ross, a member of the mechanism
11 subgroup whose documents have already been
12 produced in this litigation."
13 And furthermore on page 3 where they
14 state that "Monsanto expects Dr. Jameson
15 will be able to testify about the scientific
16 debate and key findings that led to the
17 animal subgroup's change in evaluation."
18 It is our position that this
19 deposition is limited to what occurred at
20 the animal subgroup's meetings.
21 Monsanto had a representative,
22 Dr. Sorahan, and others present during the
23 general plenary sessions of the IARC
24 meeting, therefore we believe it is limited
25 as requested in this briefing document by

1 Monsanto to the animal subgroup.
2 I also would like to reference
3 another --
4 THE REPORTER: If you could speak up,
5 counsel, I'm having trouble hearing.
6 MS. FORGIE: Sorry.
7 I thought you could hear --
8 THE REPORTER: "I would also like
9 to" --
10 MS. FORGIE: -- to refer everyone to
11 pretrial order No. 22, which I don't have
12 clean copies of, but I'm sure everyone has a
13 copy of it, that states that the court
14 concludes that Monsanto may question
15 Dr. Jameson for up to six hours of the total
16 deposition time.
17 THE REPORTER: Let me mark it.
18 MS. FORGIE: We could use this unless
19 you have a clean copy.
20 MR. LASKER: That's fine.
21 MS. FORGIE: Sorry.
22 Do you object to the circle at this
23 time?
24 MR. LASKER: No.
25 MS. FORGIE: Okay. So we're on 12-7.

1 (Exhibit 12-6, Ten-page letter
2 to Honorable Vince Chhabria from
3 Joe Hollingsworth, Michael Miller,
4 Aimee Wagstaff and Robin Greenwald, dated
5 4/4/17, marked for identification, as of
6 this date.)
7 (Exhibit 12-7, One-page document
8 entitled Pretrial Order No. 22: Jameson and
9 Ross Depositions, marked for identification,
10 as of this date.)
11 MR. LASKER: Are you done?
12 MS. HANLON: Oh, I have one more.
13 Sorry.
14 You should have jumped in faster.
15 MR. LASKER: No doubt about it.
16 MS. FORGIE: No. 12-8 is a Pretrial
17 Order No. 18 stating -- an order of the
18 court stating that Dr. Jameson's fact
19 deposition will take place no later than
20 May 5th. And it is, indeed, taking place no
21 later than May 5th.
22 (Exhibit 12-8, One-page document
23 entitled Pretrial Order No. 18: Deadline for
24 Additional Deposition, marked for
25 identification, as of this date.)

MR. LASKER: Okay. And for the record, with respect to the time of the deposition and the court's order, pretrial order No. 22 -- and just for clarification, the six hours that we have for questioning is out of a total of seven hours, which I believe is what has been worked out with you and your counsel.

So then we'll have an hour left for your counsel or for plaintiffs counsel to the extent that they have questions for you as well.

But we will be finished within the seven-hour time period, so you'll be done today.

And with respect to the scope of the deposition, we do agree that this is a fact deposition.

And if Dr. Jameson is identified and produces an expert report in this litigation there will be a subsequent deposition that addresses any expert opinions that you express in this litigation.

With respect to the scope of the deposition that is, I'm not exactly sure to

the extent plaintiffs counsel was seeking to limit it.

The deposition will be consistent with the scope of the document requests and the subpoena that was issued in this case.

EXAMINATION BY
MR. LASKER:

Q. So with that, Dr. Jameson, you're now on.

In case you thought you were just going to get away without talking.

A. I thought it was going to be easy, just sit here all day and listen to everybody talk.

Q. Let's -- let me turn first to your curriculum vitae, which I was going to mark, but now it's already been marked.

And I just have to figure out what number it was.

MS. HANLON: Exhibit 3.

Q. Okay. So Exhibit 3.

Let me -- first of all, good morning.

A. Good morning.

Q. Let me just put that deposition in front -- your CV in front of you, although I

expect you know most of what's in there.

And let me just start by asking you for your educational background.

A. I received my bachelor's of science in chemistry from Mount Saint Mary's College in Emmitsburg, Maryland.

I received a Ph.D. in organic chemistry from the University of Maryland in College Park.

Q. And if you can just briefly run through what your professional background -- your professional background since you finished your educational training.

A. After graduating with my Ph.D. I was initially employed as a contractor for the National Cancer Institute for its animal bioassay program.

I was then recruited by the National Cancer Institute and went to work for NIH or National Cancer Institute, NCI, as a senior chemist for the rodent bioassay program.

Following that I -- the program that I was affiliated with was transferred to the national toxicology program at the National Institute of Environmental Health Sciences in

Research Triangle Park, North Carolina. It's the only National Institute of Health that isn't in Bethesda, Maryland.

There I was the lead chemist for the national toxicology program and also responsible for the -- all the chemistry aspects of the animal rodent bioassay program.

Following that I moved into the office of the director of the National Institute of Environmental Health Sciences. And there I got involved with the -- what is the Report on Carcinogens.

Do you need a definition of what the Report on Carcinogens is?

Q. Sure.

A. Okay. The Report on Carcinogens is a document that is required by the Public Health Service Act, I think it's 1968 or something like that.

It requires that the Secretary of Health and Human Services submit a report to Congress.

Initially it was every -- supposed to be every year, but subsequently it was changed to a biannual report, but now I think it's when

it's ready it's submitted.

But anyway, it's a report to Congress that lists all of the materials that are either known to be human carcinogens or reasonably anticipated to be human carcinogens, and to which a majority of the population of the United States are exposed.

So basically it was a document that Congress requested for information on what materials were known or reasonably anticipated to be human carcinogens. And ultimately it was tagged, if you will, as the official U.S. government list of carcinogens. I was responsible for that.

Becoming director -- ultimately director for that Report on Carcinogens and continued that until I retired from the government in 2008.

In 2008, upon retirement, I set up a private consulting firm, CWJ Consulting, LLC, which has a total employment of one, me, and I do consulting for environmental carcinogenesis.

Q. And as I see from your curriculum vitae, that you were the director for the Report on Carcinogens from 1995 to 2008; is that

correct?

A. Correct.

Q. And during that period, how many Reports on Carcinogens or how many times did you submit a Report on Carcinogens to Congress?

A. How many Reports on Carcinogens were submitted?

Q. Yes.

A. Let's see.

I think I was responsible for the eighth through the 12th report on carcinogens.

Q. Okay. And what -- so that would be five Reports on Carcinogens?

A. Uh-huh.

Q. What work was conducted by you and your staff in compiling the listing of known or possible human carcinogens, which is the official list for the United States Government?

A. Well, it was from the beginning to the end.

We were -- my group was responsible for accepting nominations from outside. The NTP would go out with a federal register notice asking people or the gen -- the public or anybody if they were aware of materials that are

possible carcinogens and should be reviewed for listing in the Report on Carcinogens.

So we received nominations from private individuals, even some from industry, environmental groups, other government agencies.

And we also did a search of the literature to see if there was any new information on a chemical or a substance that possibly had shown some carcinogenic potential.

A list was prepared, submitted to the director of the NTP for approval. And once it's approved it was put into the pipeline.

We would do a thorough literature search, have a background document prepared with all the relevant, available information on exposure, human cancer, animal, experimental animal cancer, and also any information on possible mechanisms of action of the material that could lead to cancer.

These documents were then -- it went through a -- in my -- in my tenure it went through a series of reviews.

There was an NTP, NIEHS review group. It's like an internal review group of scientists from NIEHS that would review the background

document and the literature associated with it.

Essentially a peer review of the document, see if they agreed with the information in the document and give an indication if they felt there was sufficient evidence in humans or limited evidence in humans or inadequate evidence in humans, similar for the animals.

If there was any supporting mechanistic data and that the exposure data indicated there, in fact, was truly human exposure of concern for this material.

Then after that review group it went to a second review group which was an intergovernmental agency.

The National Toxicology Program is a program made up of agencies within the federal government that are interested or have research in the area of toxicology. There were four --

I'm going into way too much information here.

MS. FORGIE: Really.

A. TMI.

There was an intergovernmental agency that reviewed the background document. They

1 would give their opinion if they felt the
2 information there was adequate for humans,
3 animals and mechanistic data.
4 It would then also go to the Board of
5 Scientific Counselors, which is a group of
6 independent scientists that are -- that the NTP
7 identifies to advise them on their research
8 efforts.
9 They're made up of industry, academia,
10 and other scientists with the proper
11 credentials. They review the document.
12 All those recommendations are taken,
13 culminated, reviewed by staff, taken to the
14 director and ultimately if the recommendation is
15 to list and the director agrees that everybody
16 was in agreement, then it would be sent up to
17 the Secretary of Health and Human Services for
18 final approval.
19 Sorry, that was rather lengthy.
20 Q. No, that's important to have a sense
21 of the scope of this.
22 MS. FORGIE: Well, I'm going to --
23 Q. Let me just --
24 MS. FORGIE: Let me interpose an
25 objection here.

1 I think that, you know, we've produced
2 the CV as a courtesy and as requested, but I
3 don't think that going into great detail
4 about what he did in the toxicology program
5 was appropriate for a fact witness
6 deposition at all.
7 You're trying to get into bias and the
8 type of things that would be handled in an
9 expert deposition. So I'm going to start
10 interposing objections --
11 MR. LASKER: Well, I think --
12 MS. FORGIE: Let me just finish.
13 I'm going to start interposing
14 objections to that.
15 MR. LASKER: I believe my question was
16 what was your job at the NTP, so --
17 But that's fine.
18 But let me --
19 MS. FORGIE: I think you understand my
20 position.
21 MR. LASKER: I think it's a coaching
22 objection, but that's fine.
23 Q. But let me just follow up --
24 MS. FORGIE: I don't agree.
25 Q. -- with respect to what you testified

1 about with respect to your job.
2 So during this 13-year period that you
3 were the director for the Report on Carcinogens
4 for NTP, in preparing this official U.S. list of
5 carcinogens did you and did the NTP ever
6 identified glyphosate as either a known or a
7 possible human carcinogen?
8 A. No.
9 MS. FORGIE: Objection.
10 Wait, let me get my objection in.
11 Objection, this is exactly the kind of
12 thing that I think is objectionable.
13 It has nothing to do with what he did
14 at IARC and it's beyond the scope of this
15 deposition.
16 MR. LASKER: Okay. Let me repeat the
17 question.
18 MS. HANLON: I join in the objection.
19 Q. Let me repeat the question.
20 During this period, this 13 to 14-year
21 period when you were the director of the Report
22 on Carcinogens for the NTP and responsible for
23 printing up the official List of Carcinogens for
24 the United States government did you or the NTP
25 ever identify glyphosate as a known or possible

1 human carcinogen?
2 MS. FORGIE: Objection, it's beyond
3 the scope.
4 MS. HANLON: Objection.
5 A. No.
6 Q. Now you mentioned that you were in
7 charge -- I'm sorry, that you worked on
8 chemistry aspects of animal cancer bioassays
9 during this period I guess prior to 1995.
10 I guess maybe for about -- if the date
11 is correct, for about a 15-year period or maybe
12 more than that.
13 Yeah, about a 15-year period.
14 What does that mean?
15 Just -- I'm trying to get a sense,
16 what is the chemistry aspects of cancer
17 bioassay?
18 MS. FORGIE: Objection, beyond the
19 scope.
20 MS. HANLON: Form.
21 Join.
22 A. I can go into an explanation, but I
23 don't know that it's relevant to what I did at
24 IARC.
25 Q. I understand.

And she has -- plaintiffs counsel has the right to object on the record and the court will decide whether or not those objections are valid.

But unless they instruct you not to answer, and that would be an instruction from your counsel, you do have to answer the question.

A. Okay.

MS. HANLON: I am also going to add an additional objection.

In the sense that since Dr. Jameson's deposition is going to be retaken a second time as an expert witness, that is something that plaintiffs counsel will review at that time.

And the court will determine whether or not a second line of questioning on the same -- for the same line of questioning can be revisited.

MR. LASKER: That's for the court to decide.

Q. I'm still asking the same question, what is the --

You said you were involved in the

chemical aspects of animal cancer bioassays, what does that mean?

MS. FORGIE: Objection.

A. Basically as a chemist I was responsible for identifying the chemical or the substance that was nominated, to make sure we were looking at the proper material.

I was responsible for getting -- procuring the chemical, having it analyzed, characterized, determine its purity, determine if -- what vehicle it was compatible with.

We could mix it in the feed or the water or if it had to be mixed in corn oil for a stomach intubation study or could we generate an atmosphere.

It included participating in protocol development for the animal bioassay from the standpoint of bringing the expertise of chemistry into the determination of how the protocol should be established and commenting on all aspects of the development of the protocol for the bioassay study.

Q. Okay.

A. I -- it also involved reviewing the data from the animal bioassay after the study

was completed -- well, it included monitoring the study while it was in progress, going to the laboratory and making sure they were doing the studies properly.

And it also included after the study was completed reviewing the document -- the report from the contract laboratory for its completeness and evaluating the data that was in there.

And participating in writing the ultimate technical report that is published on the NTP bioassay of a particular substance.

Q. And would you then be also involved in reviewing tissue slides of the prog report?

MS. FORGIE: Objection, beyond the scope.

And I'm going to join in counsel's objection that we reserve the right to not allow him to answer these similar questions should he be deposed as an expert.

MR. LASKER: You can have a standing objection about that.

MS. HANLON: And I'd like to join in the standing objection, please, anything that relates to on the CV and his prior

experience that may go outside of the reason he is here today, which is a factual deposition in regards to the animal subgroup's discussion.

MR. LASKER: And just to be clear, the whole deposition is about his role, as the animal toxicology subgroup on IARC does depend on his knowledge of animal toxicology, so all this is directly relevant.

I'm not sure exactly what the objection is, but you have a standing objection.

And let me repeat my objection.

MS. FORGIE: Let me just say I don't think -- I completely disagree with that.

You're not entitled to do that in a factual deposition.

And I'm not going to go for a standing objection, I don't like them.

MR. LASKER: Okay. That's fine.

I just -- I do want the time, though, for objections to be on plaintiffs and not for us.

MS. FORGIE: I don't agree.

Q. Continuing with the question, would that involve reviewing tissue slides?
MS. FORGIE: Objection.
MS. HANLON: Join.
A. I'm not a pathologist.
Q. And would that involve analyzing, as far as an animal toxicologist is concerned, the findings of tumors in controls versus the treated groups in a study?
MS. FORGIE: Objection.
A. Reviewing tumor incidence in animals, yes.
Q. And would you conduct statistical analyses of those tumor incidences?
MS. FORGIE: Objection.
MS. HANLON: Join.
A. We had a statistical group at the NIEHS that performed all the statistical analysis for the studies.
Q. Okay. Just to be clear, my prior question I was asking about you specifically.
Would you conduct any statistical analysis?
A. No --
MS. FORGIE: Objection.

A. -- because it was done for us by the statisticians.
Q. And would you review the tissue findings and the tissue counts to reach conclusions as to the tumor findings in the study?
MS. FORGIE: Objection.
MS. HANLON: Join.
A. I would participate in those review meetings of staff, yes.
Q. Okay. But would it be your decision to do that work initially or would you just be in meetings with staff when other people presented --
A. I would --
MS. FORGIE: Wait.
Objection.
A. I was in the meeting and helping evaluate the data.
Q. Okay. So there would be an animal toxicologist then that would analyze the data, present the data to the meeting, and then all of you would discuss it; is that correct?
MS. FORGIE: Objection.
MS. HANLON: Join.

A. Yes.
Q. Okay. Now you mentioned that you were a private consultant since 2008.
And if you can just give a general discussion or general explanation of what your consulting work has involved during this period since 2008.
MS. FORGIE: Objection.
What does this have to do with anything at IARC?
A. Why is that relevant to what happened at IARC?
Q. That's -- I'm here to ask questions, you're to answer questions.
So I'll ask the question again.
What has been the general nature of your consulting work since 2008?
MS. FORGIE: Objection, privileged.
MS. HANLON: Form.
A. I've had several clients in the area of environmental cancer.
Q. Okay. And have you consulted with -- and you don't have to name names because obviously if it's non-testifying some of those will be confidential.

I leave that to you and your attorney.
Have you consulted with private corporations?
MS. FORGIE: Objection, privileged.
A. That's private, confidential.
Q. The issue of who you consulted with, the names would be.
The question of whether or not you've consulted with private corporations is not, unless your counsel wants to instruct you not to answer.
MS. FORGIE: Objection.
Q. Have you consulted with any private corporations?
A. Yes.
Q. Have you --
And with respect to that, and again I don't want you to talk about the details of any individual chemical or any individual client by name, but what is the general nature of the work that you've been -- that you've done as a consultant for private corporations?
MS. FORGIE: Objection, privileged.
MS. HANLON: Objection, form.
A. They've been asking my opinion in the

area of environmental carcinogenesis.
Q. And again, without naming particular substances would that involve, first of all, conducting animal studies, animal toxicology studies?
A. No.
Q. Would that involve reviewing reports of animal toxicology studies that have been conducted internally?
A. Yes.
MS. FORGIE: Objection, privileged, way beyond the scope.
A. I -- I don't understand what you mean by internally.
Q. Okay. Would that include reviewing regulatory animal toxicology studies -- animal toxicology studies prepared for regulatory purposes?
MS. FORGIE: Objection.
MS. HANLON: Object to form.
A. That's a very broad question.
Q. Okay. Well, let me ask it differently then.
Would that -- would your private consulting work have involved reviewing animal

toxicology studies, the full report of an animal toxicology study?
MS. FORGIE: Objection.
MS. HANLON: Form.
A. Yes.
Q. Okay. Have you helped private corporations submit toxicology or prepare toxicology studies for submission to agencies like the Environmental Protection Agency?
MS. HANLON: Before we go on I'd like to make an objection.
And I'm going to instruct my client that it's my understanding this is beyond the scope of the factual deposition.
I was told that this is a deposition in regards to his participation in the animal subgroup discussion.
We were not prepared to talk about his curriculum vitae and his experience and background, which I believe is more proper at the time of his expert deposition.
So I am instructing him, because he seems to be agreeing with that, it's outside the scope of what his understanding is and not to respond to this at this time.

Not meaning that he is not going to respond in the future for an expert deposition when he is going to be available for you to question him on -- in great detail on his curriculum vitae.
MR. LASKER: Okay. Well, I'm going to continue with my questioning.
I'm also going to object to the fact that plaintiffs counsel is providing objections to Mr. Jameson's counsel, writing notes back and forth.
If Ms. -- if plaintiffs counsel wants to represent Dr. Jameson in this deposition, she can, otherwise I will object to the continuing communications back and forth of counsel, about which objections should be made.
And I'll continue with my questions --
MS. HANLON: And I'll object to that, sir, because the nature of what we are writing is not known to you.
And I object to your discussion on the record as to what you believe is the nature of our writing.
MR. LASKER: Okay. All I know is that

you write something -- you forward -- you write something down, she hands it to you, and you object.
I can't say what's on the piece of paper, but I can say what's going on.
MS. FORGIE: That is not a correct representation of what is happening and it's insulting.
MR. LASKER: Okay. Well, then stop doing it.
MS. FORGIE: No.
Don't tell me what to do at a deposition.
BY MR. LASKER:
Q. So Dr. Jameson, have you consulted as part of your consulting work with advocacy organizations like the NRDC or other organizations that have an interest in issues relating to environmental carcinogenicity?
MS. FORGIE: Objection, privileged.
A. I really don't see what this has to do with this deposition on IARC.
Q. I understand that's your answer.
But unless your counsel instructs you not to witness (sic) and then I can raise the

1 issue with the court, you still do have to
2 answer the question.
3 THE WITNESS: I thought she just
4 indicated that I --
5 MS. HANLON: It's my understanding --
6 MR. LASKER: If your counsel instructs
7 you not to answer, and she is free to do
8 that, we can raise it with the court.
9 MS. HANLON: And I have instructed
10 Dr. Jameson not to answer anything that is
11 outside the scope of the deposition that
12 we're prepared to sit for here today, which
13 is a factual discussion of the animal
14 subgroup that was conducted and then his
15 involvement with that.
16 MR. LASKER: I understand that.
17 Are you instructing him not to answer
18 the question?
19 MS. HANLON: I have instructed
20 Dr. Jameson not to answer any of the
21 questions that he believes are not connected
22 with the factual studies that were done as
23 part of the animal subgroup, correct.
24 MR. LASKER: So you're giving him an
25 open-ended instruction not to answer

1 questions that he believes that they're not
2 appropriate?
3 Because if so, we'll get the judge on
4 the phone right now.
5 MS. HANLON: That was not my
6 objection.
7 My objection is that we are here today
8 to discuss his role in the animal study
9 subgroup.
10 MR. LASKER: Okay. I'm going ask the
11 questions.
12 If your counsel instructs you not to
13 answer that specific question, then you
14 can -- you should certainly listen to what
15 your counsel says.
16 If she does not instruct you not to
17 answer that question I'm going to expect an
18 answer to the question.
19 Q. And so I ask the question again, have
20 you done as part of your work as a private
21 consultant since 2008 any consulting work for
22 organizations like the NRDC or other
23 organizations that have interests in issues of
24 human carcinogenicity?
25 MS. FORGIE: Objection.

1 MS. HANLON: I'm objecting and
2 instructing him not to answer.
3 MR. LASKER: Am I correct then for
4 counsel that you will not -- you will
5 instruct the witness not to answer any
6 questions dealing with any consulting work
7 he has conducted from 2008 and to the
8 present?
9 MS. HANLON: That's correct.
10 We believe that it's the subject of
11 his expert deposition that will be taken.
12 MR. LASKER: Okay. And are you
13 representing then that Dr. Jameson will be
14 producing an expert report and we will be
15 getting an expert deposition of Dr. Jameson?
16 MS. FORGIE: Are you -- you're looking
17 at me now, Eric, so are you switching and
18 asking me a question?
19 MR. LASKER: Well, plaintiffs counsel,
20 I assume you're the ones who will have the
21 answer to that question.
22 MS. FORGIE: Well, I don't have the
23 answer right now.
24 On May 12th, as the judge has ordered,
25 we will make a decision as to whether we're

1 designating him and whether we're serving an
2 expert report.
3 MR. LASKER: Okay. Given that
4 representation, that there is no guarantee
5 that there will be a deposition --
6 MS. FORGIE: Just wait, let me
7 finish --
8 MR. LASKER: -- of Dr. Jameson as an
9 expert witness --
10 MS. FORGIE: Eric, I didn't finish.
11 MR. LASKER: Okay.
12 MS. FORGIE: But this is still beyond
13 the scope of a fact deposition.
14 You're asking him questions about what
15 kind of consulting work he has done and he
16 has already stated he is uncomfortable with
17 that.
18 MR. LASKER: I understand.
19 That I believe that there has been
20 lots of depositions taken in this case about
21 third parties that has gone into their
22 consulting relationship.
23 I think we actually had issues before
24 the court was involved in that in
25 depositions that plaintiffs counsel have

1 taken.
2 But just to clarify, there is no -- as
3 plaintiffs counsel has now stated, there is
4 no expert deposition that is guaranteed to
5 take place in this case.
6 So to the extent that that is the
7 basis for your objection to these questions,
8 that objection is not valid.
9 So again, I'm going to ask you and --
10 MS. HANLON: If I may respond, sir.
11 My objection is twofold.
12 One, that there is as we understand
13 right now, that he has not been retained
14 formally as an expert, that is true.
15 But No. 2, my original objection was
16 the fact that he was produced and asked to
17 be present today to give facts regarding his
18 involvement in the animal subgroup, so he
19 was prepared to come today to discuss his
20 involvement in that animal subgroup.
21 MR. LASKER: Okay. And my question
22 then to both plaintiffs counsel and
23 Dr. Jameson's counsel -- first I'll ask the
24 plaintiffs.
25 Is it plaintiffs position that third

1 parties who are involved in analyses of
2 issues relating to glyphosate science, that
3 their outside work is irrelevant to the
4 issues in their deposition and should not be
5 inquired into?
6 MS. FORGIE: Our position is that, as
7 we noticed in Exhibit -- I can't remember
8 now the number.
9 The one that had your briefing letter
10 on it, Exhibit 5 -- 6, wherein you said that
11 was the whole purpose of taking this
12 deposition, that that limits the scope of
13 his deposition to what he did at IARC.
14 And that has clearly been -- that was
15 the representation that you made to -- that
16 your firm and you made to the court when you
17 asked for this deposition.
18 And to ask him questions about the
19 consulting work that he is doing, which he
20 already said he is uncomfortable discussing
21 because it's private and privileged is
22 beyond the scope of that.
23 I think you can ask him limited
24 questions --
25 MR. LASKER: My question to you --

1 MS. FORGIE: Wait, let me finish,
2 Eric.
3 I think you can ask him limited
4 questions about his CV.
5 But to ask him questions about who he
6 consults with, no, I don't think that's
7 appropriate.
8 I think that's privileged and I think
9 it's beyond the scope.
10 MR. LASKER: And just so the record is
11 clear, is it plaintiffs position that
12 questions going to issues of potential bias
13 or outside consulting work of third-party
14 witnesses is irrelevant and outside the
15 scope of this litigation?
16 MS. FORGIE: I'm not going to answer
17 the question that way because this is a
18 different type of deposition.
19 As you know, he has been retained as
20 an expert.
21 Right now he is a non-designated
22 consulting expert so there is privileges
23 there.
24 But furthermore you have made
25 representations to the court about the scope

1 of this deposition.
2 And you have limited this deposition
3 in your request to the court to take this
4 deposition, to what was done at IARC.
5 We're allowing wide leeway in terms of
6 bringing his CV and letting questions be
7 asked.
8 But when you start asking about
9 privileged information, about outside
10 consulting work, that's beyond the scope.
11 MR. LASKER: Just to be clear, we've
12 not asked for any privileged information.
13 We've not asked him to identify any
14 specific entities he has worked with or what
15 he has done with them.
16 You know, in response -- contrasting
17 back to what plaintiffs counsel have asked
18 of other third-party witnesses.
19 And we have not in our submission to
20 the court limited ourselves to testimony
21 about his background or issues that might
22 relate to bias or issues involving how he
23 approached the issue of analyzing the data
24 for IARC.
25 If it is plaintiffs position, though,

that questions going to bias and outside consulting work is irrelevant, that is something that we need to have on the record.

And if it's not plaintiffs position that that information is outside the scope when they're taking depositions, then we will object to the instructions not to answer questions that have been given now repeatedly in this deposition to issues going to that.

So again, what is plaintiffs position?

MS. FORGIE: I've already stated my position very clearly.

My position is that the scope of this deposition is outlined in Exhibit 6, which is the brief letter you filed with the court.

I have not given any instructions not to answer.

And finally, you did ask privileged questions, because Dr. Jameson testified that the information you were asking him was something he was not comfortable discussing because it involved other clients and other

work he was doing for other clients.

So you have asked privileged information.

MR. LASKER: Well, for the record, to the extent that continued instructions not to answer are given by counsel, we will reserve our right to reopen the deposition after we raise that issue with the court and we'll get additional time.

BY MR. LASKER:

Q. Dr. Jameson, there has been a representation by counsel, but not by you -- so that really is not relevant -- about whether or not you've been retained by an expert -- retained as an expert by plaintiffs in this litigation.

And so let me ask you a question, to your understanding have you been retained as an expert for plaintiffs in this litigation?

A. Yes.

Q. And have you been retained to your understanding as a testifying expert or a potential testifying expert in this litigation?

MS. FORGIE: Objection, privileged. Don't answer.

MR. LASKER: You're instructing him not to answer the question about whether or not he has been proposed as a testifying expert?

MS. FORGIE: He doesn't know that right now.

We haven't made that decision.

How could he possibly know that?

And that's privileged anyway.

MR. LASKER: Okay. I'm not sure if it's privileged if you've just told me the answer, but okay.

MS. FORGIE: I haven't told you the answer.

But if I answered a question, that makes me happy.

Thank you, Eric.

Q. As far as you know then, you have not been told whether you'll be a testifying expert in this litigation, is that fair to say?

MS. FORGIE: Objection, that's privileged.

Don't answer that.

MS. HANLON: I direct you not to answer.

MR. LASKER: And, I'm sorry, you're instructing the witness not to answer in what capacity here?

MS. FORGIE: On the grounds that he has been retained, as you well know, as an expert and as a non-testifying expert, which is where he is right now.

All the information about the discussions between us are privileged and you know that.

And there's an agreement in effect to that, too, in addition to the federal rules.

MR. LASKER: Let us mark -- or I don't have to mark as -- as Exhibit 12-4 an e-mail exchange between you and one of my partners, Neil Bromberg, on or about August 10th of 2016.

Q. And ask, first of all, if you could identify that document for the record.

A. Yes.

Q. And can you explain what that document is.

A. Well, this is correspondence between me and Mr. Bromberg.

He had contacted me and indicated that

he was interested in talking with me about potentially retaining me for this Monsanto litigation.

Q. Is it your testimony that Mr. Bromberg talked to you about retaining you or just to ask you about your experience?

A. Just asking me about the experience, basically.

It wasn't really clear.

He said he wanted to talk to me about glyphosate.

Q. And am I correct in my understanding that you agreed to talk with Mr. Bromberg initially?

A. At the time I did, yes.

Q. Okay. And at some point after that conversation you were retained by plaintiffs counsel, correct?

MS. FORGIE: Objection.

MS. HANLON: Objection to form.

Q. You were retained as a testifying -- strike that.

Sometime after that August 10th conversation with Mr. Bromberg you were retained as an expert for plaintiffs; is that correct?

MS. HANLON: Objection to form.

I'm also going to instruct the witness you can answer, but please do not disclose any confidential information with regards to discussions with attorneys.

MS. FORGIE: Join.

A. Could you repeat the question.

Q. At some point after you agreed to talk with Mr. Bromberg about your experiences at IARC, you were retained by plaintiffs counsel as an expert witness in this litigation for plaintiffs, correct?

MS. FORGIE: Objection.

MS. HANLON: Join.

A. Yes.

Q. Prior to the time that you had talked with Mr. Bromberg, had you had any conversations with plaintiffs counsel?

A. Before I talked with him?

Q. Yes.

A. No.

Q. Can you describe when was it then -- and this would obviously be before you were retained as an expert for plaintiffs -- when did you have your first conversation with plaintiffs

counsel in this litigation?

MS. HANLON: Objection to form.

MS. FORGIE: Objection.

A. I can't remember for sure.

It was either two or three hours.

Q. Okay. And did you contact plaintiffs counsel or did they call -- contact you?

A. No --

MS. FORGIE: Objection, form.

A. They contacted me.

Q. Okay. And in this first conversation with plaintiffs counsel, did you advise them that -- and again, this would be prior to being retained as an expert witness -- did you advise plaintiffs counsel that you had agreed to discuss your experiences at IARC with Monsanto's counsel?

MS. FORGIE: Objection, privileged.

And he never stated he had agreed to testify with -- to talk to Monsanto.

And I'm instructing him not to answer.

MS. HANLON: And I'm going to join in this because, again, this is not only a violation --

Objection, form, based on violation of

the attorney-client privilege.

Also it's not going to the basis of the factual deposition today.

What he did or did not do as a potential expert conversation -- as a potential expert is outside the scope of his discussion today.

And we're instructing him not to answer.

Q. Again, my question goes to before you were retained as an expert.

MS. FORGIE: That was not the question.

MR. LASKER: That was exactly the question.

MS. FORGIE: Could we have it read back, please.

(Record read.)

MS. FORGIE: Objection, privileged.

Don't answer that.

MR. LASKER: What's the basis for the objection?

MS. FORGIE: It's privileged.

All the conversations I had with him, you don't know when we retained him or not.

MR. LASKER: That was the question.
Q. Prior to being -- the question is specific, Dr. Jameson.
Prior to your being retained as an expert witness in this litigation for plaintiffs, did you advise plaintiffs counsel that you had agreed to talk with Monsanto's counsel about your experiences at IARC?
MS. FORGIE: Objection --
MS. HANLON: Objection, form.
MS. FORGIE: -- privileged.
Don't answer that.
MR. LASKER: Okay. We'll mark that as well.
We've had some other people join on the line, have we?
We've been hearing beeps.
MS. FORGIE: Hello, is there anybody else on the line?
Let's just ask.
Hello, is there anybody on the line?
MR. WOOL: This is David Wool, I'm still on the line.
MS. FORGIE: Okay. But did anybody else join?

MS. HANLON: He lost and he had to call back.
MS. FORGIE: It's technical.
Anyway, the basis is conversations with him and I are privileged and he was retained as an expert, and you know that.
Q. How many conversations did you have with plaintiffs counsel before you agreed to serve as an expert in this litigation?
MS. HANLON: Objection, form.
Direction not to answer.
Q. When you were --
At some point after you agreed to serve as an expert for plaintiffs counsel you provided them with -- well, strike that.
We --
You received a subpoena from us for documents relating to your work on IARC, do you recall that?
A. I do.
Q. And at some point in time you gathered documents in response to that subpoena, correct?
A. I did.
Q. You then provided those documents to plaintiffs counsel, correct?

A. Correct.
Q. You did not provide the documents to us, correct?
A. Correct.
Q. You also, is it correct, advised plaintiffs counsel not to provide us with the documents that you had provided to plaintiffs counsel; is that correct?
MS. FORGIE: Objection. Objection, privileged.
Don't answer that.
He is not going to answer any questions about discussions he had with me.
You know that, he is retained as an expert.
MR. LASKER: Actually this is something that you guys told us.
So to the extent that there was any privilege, you've long ago waived it.
MS. FORGIE: I don't agree that we've waived it.
And I'm instructing him not to answer about discussions that he had with us.
If we waived it.
Q. Is it your --

Well, let me ask you this, why did you elect to provide documents to plaintiffs counsel and not to Monsanto's counsel?
A. I was asking for some guidance.
Q. So you were asking plaintiffs counsel for guidance as to whether or not you should provide documents to Monsanto's counsel; is that correct?
MS. FORGIE: Objection, that's privileged.
Don't answer that.
MR. LASKER: That's not privileged.
MS. FORGIE: It is absolutely privileged.
And he is talking about --
MR. LASKER: Are you --
MS. FORGIE: Wait. Let me finish my objection.
He is discussing the conversations he had with us, that's privileged.
And he was retained as our expert.
MR. LASKER: Are you representing that you're his counsel in connection with his response to the subpoena that was issued to him in this case?

MS. FORGIE: I am not.
What I'm saying is --
MR. LASKER: Then the question --
MS. FORGIE: Wait. What I'm saying is he is answering with conversations he had with regard to us, and that's privileged.
And you know it's privileged.
MR. LASKER: That's clearly not privileged.
MS. FORGIE: It's clearly privileged.
MR. LASKER: You're instructing him not to respond to questions about the advice you gave him as to whether or not he should respond to the third-party subpoena that was issued to him for documents in this case.
MS. FORGIE: I am advising him not to talk about any conversations he had with us because he was retained as our expert, as you well know, and that's privileged.
MR. LASKER: Just to be clear, you are advising him not to provide answers with respect to any guidance that plaintiffs counsel provided him as to whether or not he needed to respond to a third-party subpoena for documents in this case?

Is that your position?
MS. FORGIE: My position is that he is not going to talk about conversations he had with us because we have retained him as an expert, that's my position.
And I think I've made it pretty clear.
MS. HANLON: In regards to my role, the subpoena for the documents that was produced today, I'm also instructing him not to have any conversation in regards to our discussion with the documents.
Thank you.
MR. LASKER: I'm not asking about your conversation. You're clearly his counsel.
But to the extent that plaintiffs counsel have instructed him or given him guidance on whether or how he has to respond to a third-party subpoena, there is no privilege there.
BY MR. LASKER:
Q. Let me just ask this, after you obtained the guidance from plaintiffs counsel in this litigation with respect to the subpoena that was issued to you by Monsanto, you elected not to produce any documents to Monsanto,

correct?
MS. FORGIE: Objection.
A. The situation was at the time I received the subpoena I was -- I was trying to clarify what documents I could send and what documents -- what documents I could send to you.
Mainly because in working with the IARC, when you produce documents as a member of an IARC working group, all of the documents that you produce are considered to be the property of IARC and not your personal documents.
And routinely when you attend an IARC meeting they say that, please leave all of your documents here.
If -- they say, however, if you want to maintain the references for your own purposes, then you can keep them or they will even package them up and send them to you.
But any documents that are prepared as part of the review of an IARC working group are considered the property of IARC and they ask for them to either leave them at the meeting or dispose of them.
In fact, specific to IARC Volume 112, I received communication from IARC saying that

because of a number of working group members have been contacted and asked for their files, they wanted to remind us and emphasize that the documents belong to IARC and they should either -- and if we had any, they should be returned or destroyed.
So routinely, I don't keep anything but the references usually.
I might keep the invitation letter just as a -- you know, a momento or to remind me when I was invited, but that's -- that's usually all I have in my files.
Q. I understand.
But you did make the decision to gather up all the documents you had that were responsive to the subpoena, and notwithstanding whatever communications you had with IARC, you decided to produce those documents to plaintiffs counsel, correct?
A. Just -- just to make them aware of what I had and -- at the time there was -- there was -- there were multiple subpoenas circulating from various members of the IARC working group and everybody was trying to decide how to respond to the subpoena.

1 And were waiting for some direction
2 from IARC and -- I think that IARC submitted
3 some sort of a document to you or Monsanto
4 stating that, you know, the documents are
5 privileged and belong to IARC.
6 Q. And at some point in time, after
7 producing the documents to plaintiffs counsel,
8 you had a conversation with plaintiffs counsel
9 as to whether or not you should provide those
10 same documents to Monsanto's counsel, correct?
11 MS. FORGIE: Objection.
12 Instruction not to answer.
13 He is not going to answer any
14 questions about conversations he had with me
15 or any members of my firm.
16 Q. At some point in time after your
17 conversation with plaintiffs counsel you elected
18 not to produce documents to Monsanto in response
19 to the subpoena, correct?
20 A. I decided not to take any action
21 because I thought the case was closed.
22 I thought it was -- was done.
23 Q. Why did you think it was done?
24 A. Why did I think it was done?
25 Q. Did anyone tell you that you no

1 longer --
2 Based upon your conversations with
3 plaintiffs counsel, were you under the
4 understanding that you did not have to respond
5 to the subpoena?
6 MS. FORGIE: Objection.
7 If you can answer that question
8 without telling him anything about what was
9 discussed with us, you may answer.
10 But don't tell him anything about what
11 was discussed.
12 A. Could you repeat that, please.
13 Q. I'm going to ask you this way.
14 Following your conversation with
15 plaintiffs counsel, was it your understanding
16 that your obligation to respond to the subpoena
17 was no longer outstanding?
18 A. No, I didn't get that feeling.
19 But, I mean, I didn't get that
20 direction, but I -- I don't remember all the --
21 you know, all of the circumstances, but I
22 thought that the request for -- your -- the
23 request for the information had been satisfied.
24 Q. So subsequent to your conversation
25 with plaintiffs counsel, after having provided

1 them with the documents that were responsive to
2 the subpoena, you decided that you for whatever
3 reason did not have to provide documents to
4 Monsanto in response to the subpoena; is that
5 correct?
6 MS. FORGIE: Objection.
7 A. No.
8 Q. Did you provide the documents to
9 Monsanto in response to the subpoena?
10 MS. FORGIE: Objection, time.
11 A. I don't remember.
12 Q. Let's continue --
13 MS. FORGIE: Is this a good place to
14 take a short break?
15 I just want to take like a literally
16 five minute biological break.
17 MR. LASKER: Sure, that's fine.
18 THE VIDEOGRAPHER: This will be the
19 end of video media disk No. 1. The time is
20 9:35 a.m. We're going off the video record.
21 (Recess taken.)
22 THE VIDEOGRAPHER: We are back on the
23 video record. This is video media disk
24 No. 2. The time is 9:47 a.m.
25 MR. LASKER: Okay. For the record, in

1 connection with both plaintiffs counsel and
2 Mr. Jameson's counsel's repeated
3 instructions to the witness not to answer on
4 the ground of scope we will cite for
5 plaintiffs counsel the case, Detoy versus
6 City of San Francisco, 196 FRD 362 in the
7 Northern District of California, 2000, which
8 makes it clear that instructions to a
9 witness not to answer questions at a
10 deposition on the grounds of scope are
11 improper.
12 And we again would make note as the
13 deposition goes on, to the extent those type
14 of improper instructions are provided, and
15 we'll raise that issue with the court as
16 necessary.
17 But at this point we're going to move
18 on with the deposition.
19 In particular --
20 MS. FORGIE: I'm going to respond to
21 that.
22 As far as I know, the instructions not
23 to answer that I've made have been on
24 grounds of privilege, not on grounds of
25 scope.

I've objected on grounds of scope, but I've allowed him to answer.

And certainly with regard to the CV, I think you're entitled to ask him, you know, background questions with regard -- that will establish his competency to be involved in the IARC meetings, but not to ask him questions about glyphosate, and NTP, and things like that.

MS. HANLON: And I join in that discussion because my objection in regards to the CV were very similar, in the sense that I understand how you need to establish his background.

But in regards to specific details of what he did in each of his jobs, I believe is beyond the scope of that.

MR. LASKER: I understand your position and the record will be clear as to where you instructed the witness not to answer.

And if you are not going to be doing that in the future, that will make things go a lot smoother.

BY MR. LASKER:

Q. Dr. Jameson, let me mark as the next exhibit in line -- and I'm frankly not sure what that is --

MS. HANLON: That will be 9.

MR. LASKER: No. 9, 12-9, the subpoena duces tecum that was served upon you sometime in August of 2016.

Let's have the court reporter mark that first.

(Exhibit 12-9, Multipage document entitled Notice of Subpoena Duces Tecum, marked for identification, as of this date.)

MR. LASKER: And then as Jameson 12-10 a document that you produced that has been Bates stamped Jameson SDT 001693 through 1696.

MS. FORGIE: Counsel, do you have a copy for me?

MR. LASKER: We do.

MS. FORGIE: Thank you.

And this is 12-9?

MR. LASKER: This is No. 10, sorry.

(Exhibit 12-10, Four-page document entitled Document Requests, bearing Bates stamp Nos. Jameson SDT 001693 through

Jameson SDT 001696, marked for identification, as of this date.)

Q. And Dr. Jameson, if you could first of all identify Exhibit 12-9 as the subpoena that you received for documents in this case on or about August 2016.

(Witness looks at document.)

A. Okay. It looks like it.

Q. And can you identify what Exhibit 12-10 is.

(Witness looks at document.)

A. This is a -- I think it's an inventory of what I had in my files in response to this.

Q. And did you prepare Exhibit 12-10?

A. Did I prepare this?

Q. Yes.

A. I think I did.

Q. Okay. So if I understand correctly there is on Exhibit 12-10 numbers and then listed next to those numbers either "None," indicating you didn't have responsive documents or documents that you identified as being responsive to the subpoena; is that correct?

A. I think that's what this is, yes.

Q. Okay. And all right, am I correct

also my understanding then that these documents that are listed in Exhibit 12-10 are the documents that you provided to plaintiffs counsel?

A. I believe that's correct.

Q. The document request No. 4, which is subpoena all -- subpoenaed "All research, studies, analyses, calculations, re-evaluations of previously published studies, or data you reviewed, drafted, generated, or received in connection with IARC Working Group 112."

A. Uh-huh.

Q. So that would be the listing and there's about a page and a half of documents that you had in your files responsive to that request, correct?

A. Uh-huh.

Q. Is that correct?

A. Yes.

Q. And so these documents you provided to plaintiffs counsel, correct?

A. Yes.

Q. I will represent to you that we did not receive these documents or certainly the majority I think.

A couple of them or maybe one of them we received.

The other documents we did not receive in response to our subpoena.

Do you understand --

Do you still have copies of these documents in your files?

A. I believe I do, yes.

MR. LASKER: We would again request that these documents be produced in response to the subpoena.

They have been under subpoena since August of 2016.

And to the extent that these are documents that we would want to question Dr. Jameson on, we are not in a position to do so here today.

So we will reserve our rights with respect to those documents and with respect to any further questioning of those documents.

And we would ask that those documents be produced as they should have previously in response to the subpoena.

MS. FORGIE: Counsel, they have been

produced.

MR. LASKER: Just to be clear, let's mark as Exhibit 12-11...

(Exhibit 12-11, Two-page document entitled Documents Request #4-references in my files, bearing Bates stamp Nos. Jameson SDT 000008 and Jameson SDT 0000009, marked for identification, as of this date.)

MR. LASKER: And I will represent this is a document Bates stamped Jameson SDT 000008 to 09.

And this is --

Q. Well, first of all, can you identify this document, Dr. Jameson?

A. This document?

Q. Yes.

A. It looks like it was taken from --

Q. I'm sorry, Exhibit 12-11.

A. 12-11 looks like it's taken from Exhibit 12-10.

MS. FORGIE: Do I have 12-11?

MR. KALAS: I only had three copies. I'm sorry.

MS. FORGIE: Okay. That's okay.

MR. LASKER: We will represent that

this is the document in your production that -- the only document we can tell in the production that corresponds with the listing of various documents for exhibit -- or for question 4.

We did not receive original documents.

Some of these documents are identified as far as what's available publicly, but those, of course, would not be the documents in your files or with any annotations that you may have on those documents.

And some of the documents it's even impossible to tell what they are from this list.

So again, we will repeat our prior request.

We did not receive these documents from Dr. Jameson.

They have been under subpoena since August of 2016.

And to the extent that those documents give rise to other questions, we'll reserve our right to take further deposition of Dr. Jameson regarding those documents.

MS. FORGIE: Is there a question

pending?

MR. LASKER: No.

MS. FORGIE: Okay.

MR. LASKER: Just to the extent that the representation was that they were produced, these documents were not produced.

Q. Let me direct you also to Exhibit 12-2.

And this is objections and responses to Monsanto's notice of deposition of Dr. Jameson, which we received today that was marked by your counsel.

And this lists --

MR. LASKER: I'm sorry, do we have another copy of this?

MS. FORGIE: Are you talking about the objections?

MR. LASKER: Yes, the objections.

MS. FORGIE: I have a copy, so if you're looking for one...

Q. Dr. Jameson, and just some questions, first of all, about the objections that were served.

There is just to be clear a -- the numbering scheme is off by one because there is

1 an additional question here.
2 But document request No. 5 as set
3 forth in your objections is also the same
4 question as is set forth in the subpoena at
5 No. 4, asking for the same set of documents,
6 correct?
7 (Witness looks at document.)
8 A. That's what it appears to be, yes.
9 Q. And again, it states there that "All
10 responsive documents were previously produced to
11 Defendant," correct?
12 A. That's what this document says, yes.
13 Q. Now I just want to be clear on the
14 nature of your objections to the document
15 requests that were submitted in connection with
16 this deposition.
17 There are a series of objections which
18 I don't understand or expect you to understand,
19 that's legal stuff.
20 But there is also the statement made
21 that "no documents have been withheld from
22 production on the basis of the objections set
23 forth in this Response unless expressly stated."
24 And I'll represent to you that it's
25 not stated, unless I've missed it and counsel

1 can clarify for me, that any documents were
2 withheld.
3 But I'm going to ask you that on the
4 record.
5 Do you have any documents in your
6 files that you understand to be responsive to
7 the subpoena or the document requests in the
8 notice of deposition, putting aside the issue
9 with the documents that we have just talked
10 about, that have not been produced to defendants
11 in this case?
12 A. No.
13 MS. FORGIE: Counsel, let us take a
14 short minute break.
15 I may be able to help clarify
16 something.
17 THE VIDEOGRAPHER: Okay to go off the
18 record?
19 MR. LASKER: Sure.
20 THE VIDEOGRAPHER: We're going off the
21 video record. The time is 9:59 a.m.
22 (Recess taken.)
23 THE VIDEOGRAPHER: We're back on the
24 video record. The time is 10:02 a.m.
25 MS. FORGIE: Thank you, counsel, for

1 that break.
2 I was trying to clarify something, but
3 I wasn't able to clarify it any further, but
4 I did try.
5 MR. LASKER: That's fine.
6 MS. FORGIE: Thank you.
7 Q. So Dr. Jameson, with respect to the
8 subpoena, the document subpoena included
9 requests for e-mail communications and you did
10 produce a handful of e-mails.
11 My question for you is, how did you go
12 about looking for responses -- e-mail
13 communications in response to the subpoena?
14 A. I went to my e-mail account and went
15 to the dates of the IARC meeting and looked to
16 see if I had kept any e-mails from that
17 March 2015 time frame.
18 Q. Did you --
19 A. I'm sorry.
20 Excuse me.
21 Actually it would have included like
22 six months prior to that, because that's when
23 the process started.
24 Q. Did you run any searches on your
25 e-mail system for the specific items or specific

1 names of individuals for whom the document
2 subpoena covered?
3 So, for example, to the extent the
4 document subpoena covered communications with
5 particular individuals, did you search for those
6 individuals names?
7 A. I searched the names of the
8 individuals at IARC that I had communication
9 with during the process and also the names of
10 the subgroup members for the animal
11 carcinogenesis group that I had had
12 correspondence with in the course of our going
13 back and forth with the drafts of the documents
14 that they prepared or I prepared for that
15 particular meeting.
16 But I had deleted just about all of
17 them.
18 Q. And did you also search your e-mail
19 with respect to the word glyphosate or Roundup?
20 A. I don't recall doing a search for
21 glyphosate or Roundup.
22 I would have -- I knew the names of
23 the people I would have corresponded with, so
24 that's what I did the search with, is by name.
25 And to be honest, if -- the -- well, I

1 guess the text would have had glyphosate in it.
2 The subject matter might not have said
3 glyphosate, but we might have been discussing
4 something.
5 Q. Have you subsequent to receiving the
6 subpoena deleted any e-mails that would
7 otherwise be responsive to the subpoena?
8 A. No.
9 MR. LASKER: We would ask that you
10 continue to preserve all documents and all
11 e-mails in your files.
12 And again, we'll make a request to
13 counsel that to the extent there are
14 documents that are responsive to the
15 subpoena -- the subpoena, again, was issued
16 back in August of 2016 -- the e-mail
17 communications that are within the scope of
18 the subpoena that have not been searched for
19 with respect to glyphosate, that Dr. Jameson
20 conduct that search.
21 And if there are any documents,
22 further documents be produced to us, and
23 then we will address that issue again also.
24 MS. FORGIE: Okay.
25 Q. Likewise, did you do any searches on

1 your e-mail system for Environmental Protection
2 Agency?
3 A. No.
4 Q. Did you do searches of your e-mail
5 system with respect to the World Health
6 Organization?
7 A. I did not do a search for the World
8 Health Organization, no.
9 Q. Did you do a search for the term
10 surfactant?
11 A. No.
12 Q. Did you do a search for the term
13 P-O-E-A, POEA?
14 A. No.
15 Q. Did you do a search for the term AMPA,
16 A-M-P-A?
17 A. No.
18 Q. And did you have any limitation as far
19 as time, dates with respect to the e-mails that
20 you did search?
21 A. I'm sorry, any limitations?
22 Q. With respect to the dates within which
23 you were --
24 A. Oh, you mean the search --
25 Q. Period.

1 A. No.
2 Q. Did you conduct any searches with
3 respect to EFSA, the European Food Safety
4 Agency?
5 A. No.
6 Q. Did you have any documents that came
7 up in your searches that you did do that you
8 determined were not responsive to the subpoena?
9 A. There may have been, but I don't -- I
10 don't recall.
11 Q. Did you consult with any counsel about
12 whether or not the documents you've identified
13 were within the scope of the subpoena or not?
14 A. No.
15 MR. LASKER: Well, again, we'll have
16 the same request of counsel for a search to
17 be conducted pursuant to the subpoena for
18 any additional materials.
19 MS. HANLON: So noted.
20 Q. Dr. Jameson, what did you do to
21 prepare for this deposition?
22 A. What did I do to prepare?
23 Q. Yeah.
24 A. Well, I read through the monograph
25 from Volume 112 for glyphosate.

1 I read through the preamble for the
2 IARC monographs.
3 I had access to previous depositions,
4 so I read through one or two of those to get a
5 feel for what type of questions might be asked.
6 And I met with Sharon to -- just to go
7 over -- get some advice from her as to what to
8 expect and --
9 MS. HANLON: Dr. Jameson.
10 MR. LASKER: You shouldn't go into
11 anything about that, that's privileged.
12 THE WITNESS: Sorry.
13 MS. HANLON: That's okay.
14 Q. With respect to prior deposition
15 transcripts that you reviewed, do you recall who
16 the deponents were?
17 A. Specifically, Aaron Blair.
18 Q. Do you recall reviewing any other
19 deposition transcripts?
20 A. Not for the preparation of this.
21 It was only Aaron Blair.
22 I'm sorry, it was just his.
23 Q. Okay. And did you have any
24 conversations -- not with your counsel -- but
25 with plaintiffs counsel, either alone or with

your counsel in preparation for this deposition?
A. No.
Q. Who is paying for your counsel here today?
MS. FORGIE: Objection.
A. Who is paying?
What does that --
I mean that's not...
MS. HANLON: Objection, form, relevance.
Instruct him not to answer.
MR. LASKER: Okay. Are you instructing the witness not to answer the question?
MS. HANLON: Yes, I am.
MR. LASKER: What is the basis?
MS. HANLON: Attorney-client privilege.
MR. LASKER: For who is paying for the attorney?
MS. HANLON: That's right.
And beyond the scope of this deposition.
MR. LASKER: Again, we already know that -- looked into this --

Outside the scope of the deposition is not a proper basis to instruct the witness not to answer.
MS. HANLON: And also the relevance area.
MR. LASKER: I understand that.
But the basis for your instruction not to answer is privilege; is that correct?
MS. HANLON: It's the variety.
It's relevance, it's privilege, and beyond the scope of this deposition.
MR. LASKER: Okay. And can you provide me with a cite to any legal authority by which you can instruct the witness not to answer a deposition question based on relevance?
MS. HANLON: I will provide you with one afterwards.
MR. LASKER: All right.
BY MR. LASKER:
Q. Have you spoken with anyone else besides your counsel about this deposition?
A. Other than my wife, no.
MR. LASKER: Okay.
MS. FORGIE: That's privileged, too.

MR. LASKER: I'm not going to --
MS. FORGIE: You don't want to go there, do you?
Q. Okay. Dr. Jameson, I'd like to start talking to you about some of the documents that you have produced in response to the subpoena and...
MS. HANLON: If I may have a moment, Kathryn?
We're just going right here.
MR. LASKER: Okay.
THE VIDEOGRAPHER: We're going off the video record. The time is 10:12 a.m.
(Recess taken.)
(Exhibit 12-12, Multipage document entitled NTP Technical Report on Toxicity Studies of Glyphosate, bearing Bates stamp Nos. Jameson SDT 001124 through Jameson SDT 001181, marked for identification, as of this date.)
THE VIDEOGRAPHER: We're back on the video record. The time is 10:12 a.m.
MS. HANLON: Going back to the question with regards to who is paying for today's deposition, I am going to instruct

the witness that he can respond to it.
MR. LASKER: Okay.
So let's go back to that question.
Q. Who is paying for your counsel here today?
A. Me.
Q. Okay. So can you identify for the record the exhibit that has been marked as Exhibit 12-12?
A. This appears to be a copy of the NTP Technical Report on the Toxicity Studies of Glyphosate that was administered in dose feed to Fischer rats and B6C3F1 mice.
Conducted by the National Toxicology Program and published in July of 1992.
Q. And as indicated in I think what has been marked as Exhibits 12-11 and 12-10, this is one of the documents that you reviewed in connection with your work on IARC Working Group 112, correct?
A. Correct.
Q. Okay. And this NTP report is something that was prepared during the period that you were employed at NTP, correct?
A. Correct.

Q. And this document was also a report that was available to you during that period when you were in charge of the official U.S. list of known or possible human carcinogens for NTP, correct?
A. Correct.
Q. The NTP, as indicated in this Exhibit 12-12, has conducted a number of genotoxicity studies on glyphosate, correct?
A. According to this report, I really don't remember, but I think that's accurate, yes.
Q. Okay. If I could refer you to --
A. Oh, the back of the report. Okay.
Q. -- to pages, and these are Bates stamped, and I'll just put it on the record, if I didn't already.
This is Jameson SDT 001124 through 1180.
MS. FORGIE: 1181, for accuracy.
MR. LASKER: Thank you.
1181.
MS. FORGIE: Something we can agree on.
Q. And just refer you to various pages of

this document.
And I will refer just to the last page of the Bates number, but if you look at it, 1141 and 1142 in this document.
(Witness looks at document.)
Q. Bottom right corner.
A. Yeah.
41 and 42. Okay.
Q. And it's indicated in the NTP report, the NTP, National Toxicology Program, had conducted both mutagenicity studies and mouse peripheral blood micronucleus tests on glyphosate, correct?
MS. FORGIE: Objection.
(Witness looks at document.)
A. I'm sorry, could you repeat that.
I was reading --
Q. As indicated in this NTP toxicity report that you had reviewed in connection with your work on the IARC Working Group 112 meeting, the NTP has conducted mutagenicity studies and a mouse peripheral blood and micronucleus test on glyphosate, correct?
MS. FORGIE: Objection.
MS. HANLON: I'm going to instruct the

witness if you need time to read the document in order to answer a question, please feel free to do so.
THE WITNESS: Okay.
A. According to this document, to this paper, they did conduct those studies, correct.
Q. And if I could refer you to 1158, which has the results of these studies.
A. Okay.
Q. And -- well, first of all, let me ask you again, as it relates to your view of this document what is a Salmonella -- immunogenicity study in Salmonella typhimurium?
Am I pronouncing that correct?
MS. FORGIE: Do you --
A. Salmonella typhimurium, yeah.
Q. What is that?
A. Okay. Again, I'm not so sure what this has to do with IARC.
But the Salmonella is a bacterial system and they are looking for the -- if it causes a mutagenic effect in the bacteria, this strain of bacteria.
Q. And is this a standard, generally accepted genotoxicity test?

A. Yes.
MS. FORGIE: Objection.
Q. And the mouse peripheral blood micronucleus test, what is that?
A. Again, first I would say I'm not a genetic toxicologist.
Q. Uh-huh.
A. But the micronucleus assay is to check the -- use a blood smear to check to see if the chemical that was used in the study caused an effect on the micronuclei of the cell in the blood.
Q. And this is also a standard, generally accepted genotoxicity test, correct?
MS. FORGIE: Objection.
MS. HANLON: Object to form.
I think that the basis for whether or not he has the background in order to answer these questions has not been laid.
He has also indicated to you that it's not something that he was involved in.
Q. I'm going to back up.
You indicated already, I believe, that this is a document that you reviewed in connection with your work on IARC Working Group

112, correct?
You produced it as such --
A. Correct.
Q. -- okay?
A. But I concentrated more on the animal expose -- on the -- you know, on the toxicity in the animals, not the genotoxicity.
Q. In conducting in connection with your review in preparation for Working Group 112, did you read this document?
A. I read through it, yes.
Q. Okay. Again, I'll ask you, the mouse peripheral blood micronucleus test, is that a standard genotoxicity test --
MS. FORGIE: Objection.
MS. HANLON: Join.
Q. -- a generally accepted genotoxicity test?
A. Again, I am not a genetic toxicologist, but it's a test that is routinely run in some animal bioassays to see if they can gather some information on the genotoxicity of the compound.
Q. And in connection with your work as -- at NTP, and particularly as the head of that

group that created the list of known or possible human carcinogens, would this be the type of information, including about genetic toxicity, that you would routinely consider?
MS. FORGIE: Objection.
A. This would be part of the information, but just, you know, one piece.
Q. But one piece that you would consider, correct?
A. Right.
Q. Okay. Now if you go to page 1158, and particularly the bottom where it discusses genetic toxicology.
Based upon the NTP's testing, glyphosate did not induce gene mutations in either the Sprague-Dawley rats or the Syrian hamster models, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
A. Say it again.
Q. Based upon the testing that NTP conducted, glyphosate did not induce gene mutations in either Sprague-Dawley rats or Syrian hamster models, correct?
MS. FORGIE: Objection.

MS. HANLON: The same objection.
A. I see no information in here about Syrian golden hamsters.
Q. Okay. If I could direct you to the bottom of the page, "Genetic Toxicology" --
A. Ah, there it is.
MS. FORGIE: Wait.
Are you on page 58?
MR. LASKER: Yeah.
MS. FORGIE: Okay.
A. I'm sorry.
Q. So can you read the first sentence under "Genetic Toxicology" for the record.
A. "Glyphosate did not induce gene mutations in Salmonella typhimurium strains TA100, TA1535, TA97, or TA98 when tested in" prenucle -- "preincubated protocol in the presence and the absence of Aroclor 1254-induced male Sprague-Dawley rat or Syrian hamster liver S9."
So I stand corrected.
It does say it in the "Syrian hamster S9," sorry.
Q. Okay. Just so the record is clear, in NTP testing glyphosate did not induce gene

mutations in either Sprague-Dawley rat or Syrian hamster models, correct?
MS. FORGIE: Objection.
A. According to this report at the doses that were tested it did not cause an effect.
Q. And the NTP, when it conducts these tests, conducts them at the dosages that NTP believes and NTP scientists believe are appropriate, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection.
I'm going to object on the form.
I'm not sure the proper groundwork was laid here to have him testify in regards to procedures.
A. This is a study of a 13 -- this is a report of a 13-week study.
Three-week studies in the NTP are run as mostly dose setting for a potential chronic bioassay.
So the doses that -- the doses that were run here were run to see -- or to determine what doses would be appropriate for a two-year bioassay study.
Q. Okay. Well, that is with respect to

the 13-week animal bioassay --
A. Right.
Q. I'm going to ask you questions about that.
But I'm dealing now with the genetic toxicity tests which are a separate series of tests, correct?
A. Okay.
MS. FORGIE: Objection.
Q. And with respect to those tests, when the NTP conducts those genetic toxicity tests the NTP is conducting those tests at the doses that it believes is appropriate to determine whether or not glyphosate has a genotoxic effect, correct?
MS. FORGIE: Objection, asked and answered.
You can answer it again.
A. It's -- it was run to see if it causes mutagenicity, right.
Q. Okay. And it didn't, glyphosate did not cause mutagenicity, right?
A. In this particular study --
MS. FORGIE: Objection.
A. In this particular study it did not.

Q. Okay. And with respect to the mouse peripheral blood micronucleus test, glyphosate also did not induce an increase in micronuclei in mice, correct?
MS. FORGIE: Objection.
A. At the doses that the animals were exposed to, that's accurate, yes.
Q. And you have no reason to believe that the doses that NTP used in these tests were improper doses, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection.
A. As I said, they were doses that were used -- that were used in the 13-week study, which is usually a dose setting exercise for chronic bioassay.
Q. Was there a determination made in the initial report that the doses used in that 13-week study were improper?
A. I'd have to read the study through to see.
Do you want me to take the time to read the study now?
MS. FORGIE: Objection.
Q. We will continue because I'm going to

ask you questions about the 13-week toxicity study, okay?
A. Okay.
MS. FORGIE: Do you want him to read it, or no?
MR. LASKER: If he needs to in response to subsequent questions, sure.
But let me ask the question, first.
Q. At page 1158 also -- one second here.
I'm sorry.
At page 1161 the second paragraph from the bottom of the NTP report states that "The results of the Salmonella typhimurium assays and micronuclei tests showed no evidence that glyphosate is genotoxic," correct?
A. That's what's stated here, yeah.
Q. And the NTP then also looks at the literature and states that its findings that glyphosate was not genotoxic were consistent with findings in published literature, correct?
MS. FORGIE: Objection.
A. That's what's stated here.
Q. Now you mentioned that the NTP also conducted a 13-week toxicity test of glyphosate or actually 13-week toxicity tests of glyphosate

in mice and rats, correct?
A. Correct.
Q. And you're talking about dose, so let's look to the dose that was used there at page 1137.
And if you look at the 13-week study design the mice and rats were fed glyphosate at doses up to 50,000 parts per million which was equivalent to 5 percent of total food intake, correct?
MS. FORGIE: Objection.
A. No, that means 5 percent of the diet contained glyphosate.
Q. Ah, okay.
I stand corrected.
50,000 parts per million then, so base -- 5 percent of everything they ate was glyphosate?
A. In the top dose, yes.
Q. And that is generally the maximum dosage that is used in these types of animal studies, including two-year cancer bioassays, correct, 5 percent of the total diet?
MS. HANLON: Objection.
MS. FORGIE: Objection.

MS. HANLON: Objection, form.
A. Yes, that is typically the case.
Q. So the 13-week study design or the 13-week study that we're talking about tested with glyphosate up to the maximum dose used in these types of studies, correct?
MS. FORGIE: Objection.
A. I'm trying to recall if they ever went above the 5 percent level.
The issues that you run into and I'm -- you know, this is really going beyond the scope of IARC.
But very briefly, the issues you run into, if you start feeding the animals more than 5 percent -- higher than 5 percent in the diet, you start to effect their nutritional intake, and so it may -- it could compromise the results you see because you're compromising their -- you know, their nutritional intake.
Q. Okay. So the 13-week study --
MS. FORGIE: Wait.
He didn't finish.
MR. LASKER: I'm sorry.
A. So -- but there may have been studies, I really can't remember, but there may have been

studies where it was tested at higher than 5 percent.
Q. But it's fair to say that the 13-week study that NTP conducted on glyphosate was conducted at doses up to the maximum dose that's generally accepted for use in these studies, correct?
A. Correct.
MS. FORGIE: Objection.
Q. And so with respect then to the mouse peripheral blood micronucleus test and results of that test, that was a test that included doses up to the highest dose generally used in these types of studies, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection.
A. I can't speak to the micronucleus test.
Again, I'm not a genetic toxicologist.
They may do studies at higher levels than that to determine effects on micronuclei.
I don't know.
Q. Based upon your work at NTP, is a 5 percent of the diet maximum dose a dose that is -- you often see used as a top dose for this

type of micronuclei test?
MS. FORGIE: Objection.
A. It's -- the situation is, you do the study and you take advantage of the fact that you're dosing animals to do a micronuclei study.
So I mean...
Q. So it would be fair to say that generally these studies are conducted in animal tests and in those animal tests 5 percent of the diet is generally accepted as the maximum dose?
MS. FORGIE: Objection.
MS. HANLON: Objection.
A. Generally accepted for these types of studies.
Q. Now the 13-week study, and I recognize this wasn't a full two-year study, but part of the 13-week study included histopathology evaluation of various tissues, correct?
A. Correct.
Q. And part of the reason for this is to see if there is any specific organ toxicity for the compound being tested, correct?
MS. HANLON: Objection, form.
A. Correct.
MS. FORGIE: Could I have that last

question read back, please.
MR. LASKER: Part of the reason for this is to see if there is any specific organ toxicity for the compound being tested.
MS. FORGIE: Thank you.
Q. And the NTP considers that data as relevant for -- to answer the question of whether or not a two-year cancer bioassay will be conducted, correct?
MS. FORGIE: Objection.
A. It's part of the information, yes.
Q. If there is evidence of specific organ toxicity that might be a reason to conduct a two-year cancer bioassay, correct?
A. Correct.
Q. And if there is no specific organ toxicity that might be a factor that would lead NTP to determine that a two-year study cancer bioassay was not indicated, correct?
MS. FORGIE: Objection.
A. That's not necessarily true.
I mean there may be other factors that even though you see no effect at the highest dose in the sub-chronic study, there may be

other reasons to go ahead and complete a two-year study.

Q. I understand that.

But let me ask my question again.

Maybe there is exceptions, there may be other circumstances.

But a 13-week study that fails to show specific organ toxicity would be a factor that would lien against conducting a two-year cancer bioassay, correct?

MS. FORGIE: Objection, asked and answered.

You can answer it again.

A. It could be.

My -- my experience with the NTP is if they -- if they start -- initiate studies and do a 13-week study on a compound, there's concern over the chemical because of potential exposure or what have you.

And the fact that you don't see anything in the 13-week study does not tell you what you may be -- what you might see for a two-year lifetime bioassay study.

Unfortunately other situ -- other considerations such as budget and other

priorities also play a factor in not going forward with a study.

But just I -- so basically what I'm trying to say is.

Just because you get no effect in a two -- in a 13-week study is not an absolute for not conducting a two-year study.

Q. I understand that.

But let me ask it this way or let me ask this question, when NTP conducts a 13-week toxicity study and they also conduct genetic toxicity studies and the 13-week study shows no specific target organ toxicity and the genotoxicity studies show no genotoxic effect, is that evidence that NTP would then consider the basis for not proceeding with the two-year cancer bioassay?

MS. FORGIE: Objection, asked and answered --

MS. HANLON: Objection.

MS. FORGIE: -- and these are hypotheticals.

I object.

A. It lowers the priority.

Q. And that, in fact, is why NTP conducts

these tests, the 13-week test and the genotoxicity test, to determine whether or not the compound being studied is one that will be considered by NTP as being something they need to look at in a two-year cancer bioassay, correct?

MS. FORGIE: Objection.

A. No.

As I indicated before, the 13-week study is conducted as a dose setting for a potential two-year study.

Q. After conducting the 13-week study, toxicity study, and finding no specific target organ toxicity and the genotoxicity tests that showed no genotoxicity for glyphosate, did NTP then proceed to conduct a two-year cancer bioassay on glyphosate?

MS. FORGIE: Objection.

A. I don't think they did, no.

Q. Now the NTP also conducted studies to determine the extent to which glyphosate is -- and I'll direct you to this because page 1159 -- the extent to which glyphosate is absorbed into the body, correct?

A. Yes.

MS. FORGIE: Objection.

Q. And in the discussion -- well, actually, let me go back to the study itself.

All right.

I was looking at my notes.

So on 1159 the NTP found that at 5.6 milligrams per kilogram oral dose of glyphosate, about 30 percent of the glyphosate was absorbed into the body, correct?

MS. FORGIE: Where is that?

MR. LASKER: I'm sorry, on 1159 in the middle of the first paragraph.

MS. FORGIE: Are you referencing the Cabana (phonetic) study or are you talking about something NTP did?

Q. We're in the middle of the first paragraph, "If the usual assumption is made that IV administration represents the" --

THE REPORTER: Excuse me, I'm having trouble hearing you.

Q. I'm sorry.

Do you see the sentence, Dr. Jameson, that starts "If the usual assumption is made" in the middle of the first paragraph?

A. Uh-huh.

Q. So let me repeat my question.
The NTP concluded that doses of 5.6 milligrams per kilogram, only 30 percent of the oral dose of glyphosate was absorbed into the body, correct?
MS. FORGIE: Objection.
(Witness looks at document.)
MR. LASKER: And just to be clear, oral doses.
This is with oral administration.
MS. FORGIE: Objection.
A. I'm sorry, I'm trying to read this.
Let me -- just let me read through this for a second, please.
MR. LASKER: Uh-huh.
Yeah.
(Witness looks at document.)
THE WITNESS: Okay, I'm sorry.
Then your question again, please.
Q. At an oral dose of 5.6 milligrams per kilogram, NTP concluded that 30 percent of that oral dose of glyphosate was absorbed into the body, correct?
MS. FORGIE: Objection.
A. That's what it states.

Q. Okay. And now if we can go -- if we can go to -- now to page 1143.
A. Okay.
Q. And this is providing data also with respect to the intravenous or a systemic dose of glyphosate, correct?
A. Right.
Q. And the NTP concluded that systemic doses of glyphosate as indicated in Table~3 are eliminated unchanged almost entirely through the urine, correct?
MS. HANLON: If you need a moment to review the document, you may do so.
MS. FORGIE: Objection.
And again, this is so far beyond the scope of this deposition.
A. I've...
Q. Do you want me to repeat the question?
And it's at Table~3, the far column to the right, which is talking about the IV --
A. About the IV.
Q. -- the systemic dose, right, correct?
A. Uh-huh.
Q. So IV is a way -- an IV test is a way to measure a systemic dose inside the body,

correct?
A. Correct.
Q. And the NTP concluded that systemic doses of glyphosate are eliminated unchanged almost entirely through the urine, correct?
MS. FORGIE: Objection.
He said he needed time to read it.
(Witness looks at document.)
THE WITNESS: Okay.
Q. Is that correct?
A. Uh-huh.
MS. FORGIE: Objection.
Q. Yes?
A. That's what the paper -- that's what this table says.
Q. Okay. So based upon the NTP study, roughly 90 percent of a systemic dose of glyphosate is eliminated unchanged through the urine, correct?
MS. FORGIE: Objection.
A. Well, this was a -- they used C14 glyphosate, so they were monitoring the radioactivity that was eliminated.
So the 90 percent of the radioactivity from the glyphosate was from the urine, yes.

Q. So the radioactivity is a way of measuring where the glyphosate is, correct?
MS. FORGIE: Objection.
A. Correct.
Q. And after 24 hours of a systemic dose, 98 percent of that glyphosate is then being eliminated through the urine, correct?
MS. FORGIE: Objection.
MS. HANLON: Do you need time to review the document?
THE WITNESS: No.
A. That's what it says here in this paper, yes.
Q. That's correct.
And the NTP also found that -- so 24 hours after a systemic dose only 1 percent of glyphosate would be remaining inside the test animal, correct?
MS. FORGIE: Objection.
A. That's what it says here.
Q. And NTP also, if you look at page 19 --
A. 19?
Q. -- I'm sorry, 44, 1144, Bates number, that's the next page.

A. Okay.
Q. The NTP also looked at Roundup or formulated glyphosate, correct?
A. That's what it says here.
Q. And the NTP separately concluded that the absorption and elimination of Roundup was identical to that of glyphosate alone, correct?
MS. FORGIE: I'm going to object to all this line of questioning.
I think it's only fair since you're skipping all over the place to let him read the whole document because it has nothing to do with IARC.
It's completely unfair.
MR. LASKER: You can -- I'll repeat the question.
The objection is noted.
Q. The NTP separately concluded that the absorption and elimination of Roundup is identical to that of glyphosate alone, correct?
MS. FORGIE: The same objection.
And are we talking about rats or mice now?
You're bouncing all over the place.
MR. LASKER: If you keep doing

coaching objections again I'm going to have to go to the court.
The question still stands, I'll repeat it again.
Q. Dr. Jameson, the NTP separately concluded that the absorption and elimination of Roundup is identical to that of glyphosate alone, correct?
MS. FORGIE: Objection.
A. Okay. Your question again.
Q. The NTP separately concluded that the absorption and elimination of Roundup is identical to that of glyphosate alone, correct?
MS. FORGIE: Objection.
A. I am not reading that here.
Q. Okay. Let me go -- direct you then to the second paragraph and maybe --
Let me ask you this on page 1144.
The NTP found that there was no difference in the elimination of oral dose of 5.6 mg/kg glyphosate following any of these exposures compared with the elimination of a similar dose one day prior to the beginning of the administration of Roundup, correct?
MS. FORGIE: Objection.

A. That's what this sentence says.
Q. Okay. So then with respect to the elimination of oral dose of glyphosate or the elimination of an oral dose of Roundup, the NTP concluded that there was no difference, correct?
MS. FORGIE: Objection.
A. I'm not reading that in this sentence.
MS. FORGIE: I don't see it either.
MR. LASKER: Again, coaching objections are not allowed.
You keep doing this, we will go to the court.
MS. FORGIE: I'm asking you to point to me where the sentence is you're reading from.
I think that's completely fair.
Q. The first complete paragraph, "Rats were exposed to Roundup" --
MS. FORGIE: I see that.
Q. -- "in drinking water at concentrations of 0.5 to 100,000 parts per million for 9 to 16 days.
No differences were observed in the elimination of an oral dose of 5.6 milligrams per kilogram glyphosate following any of these

exposures as compared to the elimination of a similar dose one day prior to beginning administration of Roundup," correct?
MS. FORGIE: Objection.
A. That's what the sentence says.
Q. So with respect to this testing conducted in rats exposed to drinking water with concentrations of glyphosate and concentration of -- at the concentrations tested, they did not see any difference in the elimination of Roundup as compared to the elimination of glyphosate at that 5.6 milligrams per kilogram test, correct?
MS. FORGIE: Objection.
A. That's not what this sentence is saying.
Q. Can you clarify what the sentence is saying.
A. What they're saying is the elimination of glyphosate was not affected by treatment with Roundup formulation.
Q. So if a rat was exposed to Roundup the glyphosate still was eliminated the same way as it would be eliminated if the rat was exposed to glyphosate alone; is that correct?
MS. FORGIE: Objection.

MS. HANLON: Objection, form.
A. That's what I'm reading from this sentence.
You can't say anything about the elimination of Roundup --
Q. But the glyphosate --
A. -- but you can say that --
MS. FORGIE: Let him finish his answer.
A. But you can say that the administration of Roundup did not affect the elimination of the glyphosate.
Q. Okay. So to the extent that we were just talking about what the NTP found with respect to the elimination of glyphosate, that finding would not be, according to the NTP's testing, altered by the fact that the exposure was also to a formulated Roundup product, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection to form.
I think --
A. I --
MS. HANLON: And let me -- just a moment.

I think some of your questions, Eric, are bordering on more of an expert witness.
And we've been giving you -- I've been giving you great leeway in some of this stuff, but I believe your questions are getting closer and closer to those asking him to give an opinion.
MR. LASKER: Okay.
MS. HANLON: So I ask you, please, in the continuation here to monitor -- to limit your questions where they do not ask his opinion.
MR. LASKER: And just to be clear, this is a document that the witness has already testified to that he reviewed in connection with his work for IARC, and therefore anything in this document is obviously directly relevant to his work for IARC.
And so I'm just asking for the understanding of what this document says.
I'm not asking for his expert opinions.
I've asked him for what the document says, and that's what I'm going to continue

to ask him.
MS. HANLON: And I appreciate that.
But again, I'm interpreting some of your questions as bordering on asking him to give an opinion.
MR. LASKER: Okay.
MS. HANLON: Thank you.
Q. So again, Dr. Jameson what the NTP studies are indicating is first they provide the data with respect to their tests, as far as the elimination of glyphosate through -- administered to their test animal.
And then they do a separate test to determine whether or not having the administration of Roundup altered the elimination of glyphosate and they find that it does not, correct?
MS. FORGIE: Objection.
A. That's what this says, yes.
Q. Okay. Dr. Jameson, you have, I believe -- and let's actually go back to your CV, which was marked --
I'm sorry, I don't remember the name of it.
MS. HANLON: The CV is No. 3, 12-3.

MR. LASKER: Oh, good.
Thank you.
Q. So in your CV, right after your employment history and the positions that you held in connection with your employment at NI -- NTP, you list your international activities, correct, at page 3 --
A. Correct.
Q. -- through 4.
And those activities are comprised of numerous instances in which you have served on various IARC working groups in one capacity or another, correct?
A. Among others, yes.
Q. And you -- your first involvement with IARC, at least as I gather from your CV, was in 2002, correct?
A. Correct.
Q. And -- I cannot count this up.
So there's --
Well, you were also a member of an advisory group for IARC in 2003, correct?
A. Correct.
Q. And then you have been in one capacity or another on one, two, three, four, five, six,

seven, eight, nine, 10, 11, 12, 13, 14, 15 IARC working groups; is that correct?

A. Yeah, that's -- that looks to be correct.

Q. And you have over the past ten years alone -- so I guess that would start with Volume 97.

In the past ten years one, two, three, four, five, six, seven, eight, nine, 10 -- you've been on 11 IARC working groups in the past ten years; is that right?

A. That sounds about right.

Some of those meetings were not actual monograph working group meetings.

Some of those meetings were special advisory groups for evaluating the known human carcinogens that were listed in the IARC monographs.

Q. Okay. So I think that was -- you're referring to -- well, actually of the IARC working groups that you have listed in your CV in the past ten years, how many of them were actual IARC working groups in consideration of one compound or another and how many of them were this different type that you're talking

about?

A. Since 2007 one, two, three, four, five, six, seven, eight -- 10, I guess.

Q. So you've worked on 10 IARC working groups then in the past ten years, correct?

A. Uh-huh.

Correct.

Q. How did you -- well, strike that.

Let me ask it this way.

How are you contacted with respect to the possibility of serving on an IARC working group?

A. How am I contacted?

Q. Uh-huh.

A. I usually receive an e-mail from the director of the IARC monograph program, who is Kurt Straif.

And whoever is the responsible IARC staff member for coordinating a particular meeting sends an e-mail and says that IARC is considering reviewing certain chemicals for a particular volume.

Because of an individual's background and expertise, they would like to invite us to submit a declaration of interest, which is a

conflict of interest statement basically to them and to make -- to see if they can formally invite us, formally invite an individual to participate in the meeting.

Q. And is there some process by which -- I mean you've now served, as we talked about -- every year you're serving on an IARC working group.

Is there some process by which you sort of throw your hat into the ring and say I'd like to be considered for this?

MS. FORGIE: Objection.

A. Well, the process at IARC is they announce on their Web site future meetings and where they identify what chemicals they're going to be reviewing for what monograph.

And in that announcement they call for individuals to submit any information that somebody may feel is helpful for the review of any of the chemicals listed for that particular monograph.

They also ask if anybody knows an individual who may be -- have some experience or knowledge or would be helpful in the review for that particular compound, and they also say

self-nominations are allowed.

Q. Right.

A. And so that's how you find out what's going to be studied.

Q. So in connection with these IARC working groups have you nominated yourself, if you will, to serve on various IARC working groups?

A. Yes.

Q. And do you regularly monitor the IARC monograph program to determine which working groups are being formed for future --

A. Yes.

Q. And do you regularly, if you have, any experience --

At NTP I assume you've had experience with lots of compounds, correct?

A. Correct.

Q. So to the extent that you've had any experience, is it your practice then to reach out to IARC and let them know that you'd be interested?

A. If they're reviewing a chemical or a group of chemicals which I either have some knowledge on or am interested in because of my

1 past experience of NTP, I will write into them
2 and say this looks like a very interesting group
3 of compounds.
4 I outline my past experience in
5 looking at compounds similar to that and include
6 my CV and say I'd like to be considered for a
7 member of the working group.
8 Q. And I take it you consider serving on
9 an IARC working group to be something that is a
10 credential you listed certainly on your CV,
11 correct?
12 MS. FORGIE: Objection.
13 A. It's that.
14 But to be very honest with you, I
15 enjoy doing them.
16 I enjoy the stimulation.
17 I enjoy having the opportunity to
18 interact with international scientists that
19 participate in these meetings to see -- to get
20 their spin and their interpretation on what the
21 data means and to keep up.
22 Q. Do you know of the 10 IARC working
23 groups that you have served on in the past
24 ten years how many of those you, if you will,
25 self-nominated yourself to serve on?

1 MS. FORGIE: Objection.
2 A. Over the past ten years?
3 I don't know the -- I don't recall the
4 exact number, but it may be two.
5 Q. And in the earlier years were you
6 having to self-nominate more until you became
7 known as an IARC member --
8 A. No --
9 MS. FORGIE: Wait.
10 Let him finish his question and let me
11 get my objection in.
12 Were you finished with the question?
13 MR. LASKER: Yeah.
14 MS. FORGIE: Objection.
15 THE WITNESS: Okay.
16 A. My initial involvement with IARC was
17 through my activities for the Report on
18 Carcinogens.
19 And the National Institute of
20 Environmental Health Sciences provides support
21 to the IARC monograph, financial -- I mean grant
22 money and that type of support for their
23 activities.
24 Their activities coincide very closely
25 to what I was doing with the Report on

1 Carcinogens.
2 And being a supporter of IARC, the
3 National Institute of Environmental Health
4 Sciences sends a representative to all of the
5 IARC meetings.
6 And I started attending the IARC
7 meetings first as a representative of the
8 National Institute of Environmental Health
9 Sciences, that's how I -- I started.
10 And as a representative I was allowed
11 to, you know, attend all of the meetings, attend
12 the subgroups that I wanted to participate -- or
13 sit in on.
14 I was allowed to participate in the
15 discussions.
16 But as a representative I was not
17 allowed to vote on the final recommendation for
18 listing.
19 Event -- as time went on, then IARC
20 started inviting me to participate as an actual
21 member of the working group and it just grew
22 from there.
23 Q. And not going into too much detail
24 here, but as part of working on an IARC working
25 group, as I understand it, they will then pay

1 for your travel and your expenses --
2 A. Right.
3 Q. -- for a week in Lyon, France?
4 A. That's correct.
5 Q. And you mentioned that you would be
6 involved and you would form conversations with
7 other people in the scientific community --
8 A. Right.
9 Q. -- that's part of what you do this
10 for.
11 And are there --
12 Is there a group of scientists who
13 like yourself have been involved in multiple
14 IARC working groups over the years?
15 MS. FORGIE: Objection.
16 A. I see familiar faces when I go back to
17 the meetings, yes.
18 Q. And is it part of your -- serving on
19 these working groups and working with these
20 individuals, that's part of your way of sort of
21 continuing as part of a scientific community
22 that likes to address these issues --
23 A. Correct.
24 Q. -- for IARC, correct?
25 A. Correct.

Q. Now I noticed that after about however many years it was, for the Working Group 115 you finally made it I guess -- I don't know if this means it or not, but you got to be the overall chair of a working group; is that correct?
MS. FORGIE: Did you say after 115?
MR. LASKER: Working Group 115.
MS. FORGIE: Okay. Thank you.
A. Which one was that, let's see --
Q. It's on your CV, I think, on page 4, probably.
Yeah, right in the middle, "member and overall chair."
A. Uh-huh.
MS. HANLON: Is that a yes, verbally?
A. Yes.
I'm sorry, yes.
Q. Is that something, am I correct, that you considered that, becoming a chair of a working group, overall chair to be an honor?
A. I thought of it as an honor, yes.
Q. And is that something that -- an honor you sort of obtained based upon your work for IARC over the years?
A. Well, I can't speak for IARC as to how

they select the chairmen.
Q. Right.
A. But it is in recognition of I think of being -- of the work that has been done for IARC.
I think they consider if you -- if someone has experience with IARC, they know how the process works, they know how things are supposed to run.
And so therefore serving as a -- they have one up serving as a chair.
You wouldn't want somebody who is unfamiliar with the program to serve as a chair.
Plus if you look at the different chairs of the different IARC monographs it's usually -- the chair is selected based on where the emphasis -- where the emphasis of the data is placed.
I'm having difficulty explaining this.
Q. Uh-huh.
A. But, for example, if you're looking at a group of chemicals and the majority of the data that you're looking at or the strongest data that appears to be available is that for epidemiology, then they'd ask an epidemiologist

to be the chair.
If it's based on animal -- experimental animal data, they will ask somebody in the -- from the -- a toxicologist from the experimental animals.
If there's a lot of mechanistic data, they may ask somebody with a mechanistic background to chair.
That's just my observation.
Q. Okay.
A. I just can't speak, you know, for IARC because I don't know how they do it, but that's my observation.
Q. For Working Group 115 --
MR. LASKER: And actually, John, if you can just give me the members of that working group.
MS. FORGIE: 115?
MR. LASKER: Yeah, Working Group 115.
MS. FORGIE: Objection, relevance.
MR. LASKER: I'll mark this as 12 --
Where are we?
THE REPORTER: 13.
MR. LASKER: 12-13.

(Exhibit 12-13, Three-page document entitled List of Participants, marked for identification, as of this date.)
Q. And this is a document -- this is the working group that you were chair of, correct, the overall chair?
A. I believe so, yes.
Q. Okay. And you had mentioned something about -- in your previous testimony about conflicts of interest and conflicts of interest forms that you have to submit before you serve on a working group, correct?
A. Correct.
Q. And if you serve on a working group I assume that means that you've made it through the conflicts check and IARC has determined that you don't have any conflicts that would disqualify you from serving on a working group, correct?
A. Correct.
Q. So for Working Group 115, the working group you served as chair, there was a member of that working group, Ron Melnick.
Do you see that?
A. Yes.

Q. Ronald Melnick?
A. I see Ron, yes.
Q. And he was a voting member of that working group, correct?
A. Correct.
Q. And as part of the disclosure there for Mr. Melnick it's noted that he was serving as an expert witness and he was, and I'll represent a plaintiffs expert witness concerning exposure to toluidine?
A. O-toluidine, yes.
Q. Yeah.
So Mr. Melnick was a consulting plaintiff expert on exposure to toluidine, correct?
MS. FORGIE: Objection, relevance.
A. (Nodding head.)
Q. And that disclosure, though, did not disqualify him under IARC's rules for serving on IARC Working Group 115, correct?
MS. FORGIE: Objection.
A. I -- you know, I can't speak for IARC.
But evidently he sat -- his declaration of interest satisfied their criteria.

Q. And does IARC have any rules -- and this might be more directly relevant to you, I suppose -- with regard to whether or not individuals who serve on an IARC working group can subsequently serve as expert witnesses, paid expert witnesses with respect to the substances that they are analyzing as part of that working group?
A. I'm sorry?
Re -- could you restate the question.
Q. I'll state it more directly.
So you were -- served on IARC Working Group 112, correct?
A. Oh, yes.
Glyphosate, yes.
Q. And Working Group 112 analyzed, among other pesticides, glyphosate, correct?
A. Correct.
Q. And you have now been retained as an expert witness for plaintiffs in connection with glyphosate litigation, correct?
A. Correct.
Q. And you'll be paid for that work and I assume you've already been paid for that work, correct?

MS. FORGIE: Objection.
That's goes into his --
A. Correct.
MS. FORGIE: Wait.
That goes into his expert, he doesn't have to answer those questions about what he is paid.
MR. LASKER: I'm not asking about details.
Q. I'm just making it clear for the record he is a paid expert consultant, and you are, correct, for plaintiffs?
MS. FORGIE: That you can answer.
THE WITNESS: I'm sorry, Kathryn?
MS. FORGIE: This you can answer.
A. Yes.
Q. Does IARC have any rules that you're aware of that would preclude a member of a working group from thereafter accepting a paid position in private litigation in connection with one of the substances that that individual studied in connection with an IARC working group?
A. Not that I'm aware of.
Q. And in connection with being retained

as a plaintiffs expert in glyphosate litigation, do you consider your role as a member of the IARC working group in connection with glyphosate to be something that would factor into whether or not you would be able to serve as an expert witness in glyphosate litigation?
MS. FORGIE: Objection.
A. I'm sorry, say that again.
I'm sorry.
MR. LASKER: Strike that.
Q. Prior to being retained as an expert witness by plaintiffs counsel, when plaintiffs counsel reached out to you did they make any statements to you to the effect that one of the reasons they called you was that you had served on the IARC working group?
MS. FORGIE: Objection.
Make sure you only answer as to prior to the time that we retained you.
A. Yes.
I think that was -- part of our conversation was the fact that I had served on the IARC working group.
Q. Okay. Now prior to --
For IARC Working Group 112 for

glyphosate and other pesticides, you were the chair of the animal toxicology subgroup, correct?
A. For that -- for Volume 112, yes.
Q. And you had previously served as a subgroup chair for animal toxicology on other IARC working groups, correct?
A. That's correct.
Q. So you were familiar -- by the time you got to Working Group 112 you were familiar with the IARC rules and the preamble rules governing the review of animal data for purposes of an IARC classification, correct?
A. That's correct.
Q. Have you worked with any of the scientists that you met through IARC working groups subsequently in connection with your paid consulting work?
A. No.
Q. And aside from the present circumstances, glyphosate that we just discussed, have you been retained for any private paid consulting work in connection with any of the substances that you have analyzed in any of your other IARC work?

MS. FORGIE: Objection.
It may be requesting privileged information.
Q. At this point I'm not asking about who retained you.
I'm just asking whether or not -- again to repeat -- whether you have been retained for prior paid consulting work in connection with any of the other substances that you've analyzed for IARC.
A. Yes.
MS. HANLON: And I'm going to instruct him not to answer anything further.
Because, again, I think that he should be held as an expert witness, that's an appropriate question for him to ask him on at that time.
I do not think --
MR. LASKER: Again, instructing him not to answer on the grounds of scope is not a proper instruction.
So if you have instructions on the basis of privilege, that fine, but you cannot instruct him --
MS. HANLON: I have instructions on

the basis of privilege, correct.
Q. Without asking you the nature of your consulting work, which --
Well, first of all let me ask you, have you ever been retained as a testifying witness in connection with any of the substances that you've analyzed for any of your IARC work aside from glyphosate?
A. No.
Q. Okay. How many...
On how many occasions have you provided private paid consulting work in connection with substances that you analyzed as part of your work for IARC?
A. How many...
Q. How many different consulting jobs have you taken, if you will, in connection with substances that you analyzed as part of your work for IARC?
MS. FORGIE: Objection.
A. Probably -- probably three or four.
But can I qualify that answer?
Q. Answer it however you want, it's your answer.
A. The consulting that I did involved

substances that I had served as a working group member at IARC to review, but it also were substances that I had reviewed for the Report on Carcinogens.
And most of the contacts that -- or most of the clients that I have, the main reason they contacted me was because of what I did on the ROC.
It just happened that I also did an IARC.
So in response to your question there were, yeah, there were compounds that I reviewed at IARC that I have done consulting for.
But most of those were really because of my work with the ROC.
Q. When you said most of those, excluding glyphosate, are there other substances in which you have had private consulting work where you had done work for IARC and had not done work for the NTP?
MS. FORGIE: Objection.
MS. HANLON: Objection.
At this point, again, this is privileged.
I'm instructing him not to answer.

I believe it's beyond the scope.
A. I've told you what --
MS. HANLON: I've instructed you not to answer.
A. -- what you've asked.
MR. LASKER: Okay. Well, again, we'll reserve our rights on this.
Q. Dr. Jameson, turning to Working Group 112, the working -- 112 Working Group looked at five different pesticides, correct?
A. Correct.
Q. So in addition to glyphosate there was TCVP, parathion, malathion, and diazinon, correct?
A. Right, and...
Oh, TVCP, I'm sorry.
Q. Yeah.
A. Sorry.
Q. Now for each of these five pesticides I understand that there are four different subgroups, one for exposure, one for epidemiology, and one for animal toxicology, and one for mechanisms, correct?
A. Correct.
Q. And the working group members would

obviously split up the work in some way, not doing everything, correct?
A. Correct.
Q. And the working group is also divided based upon their areas of expertise, correct?
A. Correct.
Q. IARC would select scientists into a particular subgroup based upon their expertise, correct?
A. Correct.
Q. So when you were asked to join IARC 112 you were invited to join as the chair of the animal subgroup, correct?
A. Correct.
Q. There were other individuals then who were asked to join to be part of your subgroup based upon their expertise in animal toxicology, correct?
A. Correct.
Q. And likewise, the individuals that were invited to join Working Group 112 for the exposure subgroup were experts in exposure, correct?
MS. FORGIE: Objection.
A. (Nodding head.)

That's why they were asked to participate, yes.
Q. The individuals who were invited to serve on -- in the subgroup on epidemiology for Working Group 112 were invited because they're experts in epidemiology, correct?
A. Correct.
Q. The individuals who were invited for the mechanisms working group for Working Group 112 were invited because they're experts in mechanisms, correct?
A. Correct.
Q. And prior to the meeting, the week long meeting that you have actually in Lyon, as a general course members of one subgroup would not be analyzing the studies that may have been compiled for another subgroup, correct?
MS. FORGIE: Objection.
A. That's correct.
Q. So, for example, I take it prior to that one-week meeting at Lyon you did not look at the epidemiology studies or the mechanism studies or the exposure studies with respect to glyphosate; is that correct?
MS. FORGIE: Objection.

A. Prior to the beginning of the meeting?
Q. Yes.
A. Well, I -- I probably started to look at some of the mechanistic studies before the -- you know, a day or two before the meeting started, when they became available.
Q. Okay. All right.
That's a clarification for me.
Do the -- did the studies --
You said they became available one or two days before the week long meeting; is that correct?
Or the mechanism studies became available to you one to two days before the week long meeting in Lyon in March?
MS. FORGIE: Objection.
A. I'm sorry. I misspoke.
No, they weren't.
I didn't start to look at them until we got to the actual meeting, sorry.
Q. Okay. So the only studies that were available to you then prior to the meeting of Working Group 112 were the animal toxicology studies, correct?
MS. FORGIE: Objection.

A. Correct.
Q. And you were actually -- there's actually been assignments as to who has to do work before the meeting as opposed to who can just wait till the meeting and do the work then, correct?
A. That's correct.
MR. LASKER: So let me mark as the next document in line, this is the document that has been produced in this litigation by another member of the working group and by plaintiffs counsel as well.
And this will be 12-14.
(Exhibit 12-14, Four-page document entitled Vol 112 - Overview of assignments, marked for identification, as of this date.)
Q. And so document 12-14 I'll represent to you is a document, again, we received from another working group member.
And it is listed Volume 112, overview of assignments.
And I think it's actually two versions of the same document, although one is dated October 18, 2014 and the next one is dated November 20th, 2014.

First of all, let me just ask you, does this document look familiar to you?
(Witness looks at document.)
A. No, not really.
Q. Okay. Let me ask you then about -- and see if it refreshes your recollection or you may already remember.
There is a listing here of various sections of the monograph and who is assigned to author those sections, correct?
(Witness looks at document.)
A. That's what it looks like, yes.
Q. And for you there is -- as I read this, you were given two assignments in advance of Working Group 112, correct?
A. Correct.
Q. And your assignments were to draft the initial report on animal cancer bioassays for glyphosate and for TCVP, correct?
A. That's correct.
Q. In advance of the working group meeting did you also review animal studies for the other three compounds that were being -- to be examined?
A. Yes.

Q. And when did you first start looking at those studies, the ones that you were not the author?
A. When they became available from the author.
What I -- as chairman of the animal subgroup I would ask IARC to provide me with the initial drafts of all of the chemicals --
Q. Okay.
A. -- that were being reviewed because I'd like to read through them and give my comments to the people as early as I can.
The other process within the animal subgroup is that you have the individual who drafts the working paper, the initial draft of the working paper for the particular compound.
And then that initial draft is distributed to -- to other members of the animal subgroup to essentially peer review, if you will, to review, and make comments, and edits, suggestions before the meeting.
And then those comments are returned to the original author for his consideration.
Q. Okay. So generally speaking -- and I understand you may not have specific recall

about the actual dates, but how far in advance of the Working Group 112 did you receive drafts from the other assigned authors of these other three pesticides for their animal toxicology analyses?
A. I don't remember the exact date, but it was probably at least two months before the meeting.
Q. Okay. And do you recall when this document -- this document here indicates 12-14, but let me ask you if this is correct.
The assignment, as far as who is assigned to do what, is it sort of consistent with your recollection that the assignments were roughly three and a half -- given out roughly three and a half months before Working Group 112?
A. Yeah.
My experience is that they come out about four months before -- the assignments come out about four months before the actual meeting.
Q. Okay. And then so you would -- you were assigned three to four months before the meeting to draft up the analysis of the animal cancer bioassays for glyphosate and for TCVP,

correct?
A. Correct.
Q. And we'll limit ourselves to glyphosate for these questions.
A. Uh-huh.
Q. Do you recall when you then first would have begun looking at the glyphosate animal toxicology data or studies?
A. When I first started?
Q. Yes.
A. I don't remember the exact time.
What I remember is when IARC assigned you the chemical to draft they also give you access to a Web site at IARC that contains the -- contains a file of PDF files of the actual papers that they have identified for glyphosate.
Q. Okay.
A. And they instruct everybody -- all of the working group members that their preliminary literature search has identified these papers and here are the PDF files of those.
But the individual is expected to do their own literature search to supplement what is in that PDF file to make sure all the data

has been found.
So as soon as that PDF file became available, I started downloading the files and reviewing the data.
Q. Okay. So as I understand it then, there would be assignments or are these assignments made by IARC as to who is responsible for each section?
A. Yeah.
Q. So IARC makes assignments and then it would provide to each of the working group members access to those documents that would be relevant to the specific section that they were assigned to work on, correct?
A. Correct.
Although at least -- I don't remember if they were broken down by section for the glyphosate, Volume 112.
I know that in latter working group meetings you have access to a Web site that has the PDF files of all the references for all the chemicals.
And so you have to go through and identify the ones that you want to download, but they also -- but there also is a place on the

Web site where they have the results of the search that they did for the particular individual chemicals.
Q. So that's something that's going on more recently, and I take it, though, sometime in the past that changed how that worked?
A. Yeah.
Q. At one point you were given access only to those studies that were relevant to a substance and a section that you'd been asked to be author on; is that right?
A. Not -- I didn't mean to mislead you.
Previously the Web site had PDF files that were broken down into the different sections.
Q. Got it.
A. So you still had access to all of the files that they had identified for all of the sections, but they had gone through the trouble of separating them out.
Q. Right.
A. But now they don't do that for you.
Q. Got it.
And -- okay.
So you began your review based upon

the studies that IARC had identified, correct?
A. And any additional literature that I was able to find from my literature search.
Q. Right.
Now I'm going to give you the next question.
And so your literature search, you would look at peer reviewed literature, correct?
A. Okay.
Q. And would you also look for reports on regulatory documents that were publicly available, for instance, from the EPA or other organizations that would fit within the IARC rules?
A. I would --
MS. HANLON: Dr. Jameson, let him finish.
THE WITNESS: I'm sorry.
Q. That would fit within the IARC rules.
A. Yeah, I would go to an EPA Web site, but I hate to say this on tape, it's hard to find stuff on the EPA Web site.
It's so convoluted and they send you to so many different places. It's hard to find the exact information you're looking for.

By your reaction, I think you have had similar experience.

But the IARC is very good at going through and getting the regulatory documents pertinent to a particular compound.

So I would focus mostly on the NL -- National Library of Medicine, Medline search type of information.

Sometimes in looking at the particular literature it would -- the literature would reference a regulatory document and from that you could go and find something, but...

You know, you try to find some regulatory documents, but it's not that easy sometimes.

MR. LASKER: Let's take a break because we're running out of tape.

THE WITNESS: Okay.

MS. FORGIE: Okay.

THE VIDEOGRAPHER: This will be the end of video media disk No. 2. The time is 11:27 a.m. We're going off the video record.

(Recess taken.)

THE VIDEOGRAPHER: We're back on the

video record. This is video media disk No. 3. The time is 11:50 a.m.

BY MR. LASKER:

Q. Dr. Jameson, I'm sorry, I meant to do this earlier and I forgot.

You have a stack of documents in front of you that you brought with you to the deposition, can you identify what those documents are for the record.

A. Sure.

It's the subpoena that I received yesterday evening --

Q. Okay.

A. -- with all the attachments to it.

Q. Okay.

A. And then there's one additional document that I identified last night in my e-mail.

Q. Okay. And those were the documents that you had there, those --

A. This has been introduced as --

Q. I know.

I got that.

A. But there is nothing -- I didn't bring anything in addition to what was in the

subpoena.

Q. Okay.

A. And these are all...

Q. Exhibits, right.

MR. LASKER: So going back, we were talking about you had been -- after that time you had been assigned the task of drafting up the analysis of the animal cancer bioassays for glyphosate.

And let me actually mark at this point in time -- I want to do the glyphosate monograph.

Let's mark that down.

Maybe that will help Dr. Jameson in going through these questions.

This will be 12-15.

(Exhibit 12-15, Multipage document entitled Glyphosate, marked for identification, as of this date.)

Q. And for the record, if you can just identify what this document is, Exhibit 12-15.

A. This is the monograph for glyphosate from Volume 112 of the IARC monograph series.

Q. Okay. And then from pages 30 to -- I think it's 41, that would be the Section 3,

which is the section on animal cancer bioassays that you were the lead author on, correct?

A. Correct.

Q. And this is just going to be for reference for you.

We'll go into it in more detail.

But for this next line of questions, this is to help you refresh your recollection --

A. Uh-huh.

Q. -- to the extent you think necessarily.

So when you were first assigned to draft up the animal toxicology section for the glyphosate Working Group 112, you went to the IARC's Web site.

Do you recall what materials were available to you at that time from IARC regarding animal cancer bioassays and glyphosate?

A. Well, I mean I can go through and identify the references that I used in the document.

But basically there were several published journal articles for studies in rats and mice.

And several EPA documents that the IARC had been able to secure.

I'm under the impression they got it through a Freedom of Information.

But there were a number of EPA documents that contained the EPA review of several studies in mice and rats that had been submitted to them for the registration of glyphosate.

And these were unpublished industry studies that had been reviewed by the EPA and the summary of their review was contained in the documents that we got.

Q. And there is in your -- in your final monograph you also cite to some materials or some information regarding other animal studies that have been reviewed by the World Health Organization, JMPR?

A. That's correct.

That was also in the -- that document was also available.

Q. Was that in your recollection available prior to the meeting, or is that information that you obtained to be able to review either later in time or during the

meeting?

A. I'm pretty sure it was available before the meeting.

I think I used it before the -- in my draft before the meeting, I think.

I don't really remember, but I'm pretty sure it was.

Q. Okay. So sitting here today is it fair to say you're not --

You do recall the EPA documents, you mentioned those already?

A. Yes, absolutely, I remember those.

Q. The JMPR, the World Health Organization documents, you're not sure if you had them before the meeting or maybe during the meeting?

A. I think I had them before the meeting.

Q. That's why I gave you this.

I had a feeling you might be doing this.

(Witness looks at document.)

A. Yes, a 2006 document, so I'm sure I had it before the meeting.

Q. Okay. Do you recall --

And then there's other documents that

are -- or other studies that are identified in the monograph that were discussed in a published -- a peer reviewed published review article by Dr. Greim.

Do you recall that study or that paper?

A. Oh, yes, I remember that.

Q. Did you have that document prior to arriving at the working group meeting?

A. No.

Q. Okay. The -- you talked about the materials you had for -- from EPA as being documents that to your understanding were documents that had been obtained by FOIA, is that --

A. That's -- that's my recollection.

There were representatives from EPA or there were personnel from EPA that participated on the working group.

And, in fact, I think there was one or two that actually were invited that could not attend.

But I know there was at least one or two EPA members there at the working group meeting, serving on the working group.

And I don't know if they aided in getting the documents or not.

I -- they very well could have, but I don't know.

Q. Okay. And the documents that you -- the EPA documents that you had available to you, if I understand, and these are the documents that are cited by you in that section of the IARC monograph, correct?

A. Yes.

Q. Did you have any other EPA documents regarding glyphosate animal cancer bioassay studies that are not cited by you in the working group -- in the monograph?

A. There may have been other documents that we had.

We had a fair number of documents in the form of memos, memos that contain reports of their peer review of the studies.

Some of the documents were more administrative like, you know, we're having our meeting next week, are you coming, this type of thing.

And I just discarded those -- disregarded those and would not have included

1 those.
2 The ones that were included in the
3 report are the ones that would have contained
4 some data that we could evaluate.
5 Q. And did you then cite in your section
6 of the monograph, and as reflected in the final
7 monograph, all of the EPA documents that you had
8 access to that had data regarding animal cancer
9 bioassays?
10 A. Correct.
11 Q. So am I correct also then in my
12 understanding that you did not have access to
13 the full study reports, the animal cancer
14 bioassay reports?
15 MS. FORGIE: Objection.
16 A. What we had were the documents from
17 the EPA that some -- that reported on their peer
18 review of the studies that they reviewed, but we
19 didn't have any actual studies.
20 Q. Okay. And so you also did not have
21 any copies of pathology reports from the
22 underlying studies, correct?
23 A. No.
24 Some of the reports would have some
25 tables of incidence, tumor incidences and that

1 type of thing, but no formal pathology reports
2 from the study laboratory, no.
3 Q. Okay. And just to be clear, when you
4 say some of the reports would have and maybe we
5 should have our nomenclature clear.
6 You had access to the EPA memos that
7 might have data contained within them, right?
8 MS. FORGIE: Objection.
9 A. Right.
10 Q. You did not have access to any of the
11 underlying study documents or pathology reports
12 or data tables themselves, correct?
13 A. From the studies submitted to the EPA
14 that the memos were referring to, that's
15 correct.
16 Q. And it just may be subsumed in my last
17 question.
18 But did -- is it also correct to say
19 you would not -- you did not have data on any of
20 the individual animals in those studies --
21 MS. FORGIE: Object --
22 Q. -- cancer bioassay studies?
23 MS. FORGIE: Objection.
24 A. I don't recall.
25 Q. Did you have the original

1 investigators conclusions based upon their
2 review of the animal data and the pathology data
3 from the original study?
4 A. If I recall properly, some of the --
5 or the EPA memos that reported their peer review
6 of the data would indicate what the original
7 pathologist or the original study director had
8 reported.
9 Q. And that would be all that you would
10 have?
11 A. Yeah.
12 Yes.
13 Q. Now in your years at the NTP, I think
14 you testified earlier that you conducted or
15 participated in conducting original cancer
16 bioassays, correct?
17 A. Yes.
18 Q. While you were at -- and so -- strike
19 that.
20 The information that you had available
21 to you in reviewing the data for those compounds
22 was certainly greater than the information you
23 had available to you for purposes of this IARC
24 working group, correct?
25 MS. HANLON: Object to form.

1 MS. FORGIE: Objection.
2 A. I'm trying to go through in my mind...
3 The data -- okay.
4 The data available to me in reviewing
5 the studies that we sponsored in the NTP,
6 obviously we would have the full study report,
7 the individual animal data, all the soup to
8 nuts --
9 Q. Right.
10 A. -- for a particular study.
11 So for reviewing glyphosate, as for
12 reviewing any compound for the IARC monograph or
13 for the Report on Carcinogens you -- we rely on
14 the information contained in scientific
15 publications, the peer reviewed science
16 publications.
17 So the -- it's really -- it's not a
18 fair question to say that it would -- you know,
19 is it the same from an animal bioassay that I
20 was an active participant in in designing the
21 study and then reviewing the data versus in a
22 published peer reviewed journal article, you
23 know, they summarize the data and give you the
24 information, but they don't give you the
25 individual animal data.

But I would say that the information contained in a peer reviewed journal article was more complete than the information in an EPA report.

Q. Okay. So let's take this in steps because I was actually talking about the EPA reports because I --

A. Oh.

Q. There were, I understand, a couple of published animal studies that you looked at, that you found in the peer reviewed literature that you looked at in connection with your review?

A. Correct.

Q. But if I read the analysis that you prepared in the report that's in your final -- in the final IARC monograph, you conclude that those studies actually weren't particularly informative, correct, the published, peer reviewed animal cancer studies?

A. Several...

MS. FORGIE: Objection.

A. Well, that would be -- I would be giving you my opinion in that case.

So that would be --

Q. I'm only actually asking about what you stated as part of your work on the IARC monograph.

If you've changed your opinion, you have a different opinion as an expert witness in a litigation, you know, we'll get to that later.

But in connection with your work on the IARC monograph you obviously have identified some peer reviewed studies?

A. Right.

Q. And as I read through this in the report you prepared for IARC, your determination was that these studies were inadequate, the peer reviewed animal cancer bioassays were inadequate to use for purposes of your assessment of glyphosate, correct?

MS. FORGIE: Objection.

A. That's what the document states, yes.

But I'd like to make a point or a point of clarification in that the IARC monograph that we're looking at here and that was published by a IARC, this entire monograph is the product of the entire working group.

And no single author on the working group can take credit for anything, you know,

individual credit for what's in the document.

The document belongs -- is a product of the entire working group, okay.

So when you're saying what I found, I mean...

I just wanted to make it clear that the document reflects the opinion and the decisions of the entire working group, not an individual.

Q. Understood.

A. Okay. So...

Q. And that's a good point.

Let me sort of follow up on that, because how the working group comes up with their conclusions is obviously one of the things we're here to talk about.

A. Okay.

Q. So with respect to the published peer reviewed animal studies that were part of your Section 3, and I think there were two such studies, there was a study by -- or maybe there may be three.

Seralini in rats?

A. Uh-huh.

Q. Chruscielska in rats?

A. Uh-huh.

Q. And I think also --

A. There's another one.

Q. -- George.

Bioassay by George.

A. Uh-huh.

Q. Those studies as set forth in the monograph, as you've already acknowledged or discussed, in the monograph they state that those studies were inadequate.

A. Those were inadequate.

Q. Now in your initial drafting of this section, when you reviewed these studies for consideration by the working group was that your assessment as well?

A. Yes.

Q. Okay. So then let's talk about the regulatory materials and go back to the question that I asked previously, which was how much information you had available in considering those studies that were -- where you had the EPA memos as compared to when you were at NTP and you had access to the actual full study reports?

And would it be fair to say that when you had access to the full study reports you

have more information in order to inform a decision or an assessment as to whether or not a substance that's being studied shows potential cancerous effects?

MS. FORGIE: Objection.

A. Well, I mean logically that makes sense.

If you have more data to evaluate you get a better feel for what's actually happening, yes.

Q. And the EPA in its review, in the review documents that you looked at with respect to I think three of the animal studies for glyphosate, they would have had access to those underlying studies themselves, correct?

MS. FORGIE: Objection.

MS. HANLON: Objection to form.

A. Could you repeat that.

I'm sorry.

Q. Sure.

The EPA in its review of -- I believe it was three of the cancer bioassays that you looked at --

A. Uh-huh.

Q. -- one in mice and two in rats, the

EPA for purposes of its review actually had access to the underlying study documents, correct?

MS. FORGIE: Objection.

MS. HANLON: Object to form.

A. All I can say is the documents we got from the EPA indicated they reviewed the full study report.

Q. Okay. The...

And when you were at the NTP and doing your assessment for purposes of that official list of U.S. government list of possible or probable or known human carcinogens, would you have access to full study reports?

MS. FORGIE: Objection.

A. For the Report on Carcinogens?

Q. Yes.

A. Would we have access to the full study report from an NTP study, is that what you're asking?

Q. Well, let's start with that.

A. We would rely on the published technical report, yes.

Q. From the NTP?

A. From the NTP, excuse me.

Q. That would be the full study report?

A. Right.

MS. FORGIE: Objection.

Q. For --

MS. FORGIE: Wait, were you finished with your answer?

THE WITNESS: Yeah.

Q. For other studies that were -- may have been submitted to other government agencies, would you have access to the materials that those other government agencies had?

MS. HANLON: Object to form.

MS. FORGIE: Objection.

A. I'm trying -- I'm hesitating.

I'm remembering.

Q. Uh-huh.

A. I can remember instances where we were made aware that there were possible studies available that had been submitted to a regulatory agency, either the Food and Drug Administration or the Environmental Protection Agency.

Q. Uh-huh.

A. And when -- but when we contacted those particular agencies they would not share

the information with us because it was confidential.

Q. Okay.

MR. LASKER: Let me show you -- let's mark as the next exhibit in line the paper we previously mentioned.

It's a publication by Greim, G-r-e-i-m, and this will be 12-16.

(Exhibit 12-16, Multipage Review Article entitled Evaluation of carcinogenic potential of the herbicide glyphosate, drawing on tumor incidence data from fourteen chronic/carcinogenicity rodent studies, marked for identification, as of this date.)

(Discussion off the record.)

Q. So if I could --

Dr. Jameson, if you could identify --

MS. HANLON: Are you asking him for the document?

MR. LASKER: To identify that for the record.

MS. HANLON: It has not been produced to him.

MR. KALAS: It's sitting right next to

him.
MS. HANLON: I handed him mine.
MR. LASKER: Yeah, that's fine.
Q. Can you identify the document that's been marked as Exhibit 12-16?
A. This is a review article published in Critical Reviews in Toxicology by Dr. Greim on glyphosate.
Q. And the Critical Reviews in Toxicology is a peer reviewed journal, correct?
A. Correct.
Q. There was also an online supplement of data tables that were provided along with this study, correct?
A. That's -- it was referred to in this paper, yes.
Q. Okay. And -- well, let me get back to that.
Let me just first ask you some questions about the paper you have in front of you.
And you've already mentioned that you did not have a copy of this document prior to arriving at the working group meeting, Working Group 112, correct?

A. That is correct.
Q. And the Greim paper at least discusses a number of animal cancer bioassays that you had not had information about prior to arriving at the Working Group 112 meeting, correct?
MS. FORGIE: Objection.
A. Correct.
Q. You had -- in fact, it has, I believe, up to the time that you -- well, strike that.
Let me show you another document that was produced by another member of the working group.
And this is a document that has also been produced in the litigation, and to plaintiffs counsel as well.
MR. LASKER: And we'll mark it as 12-16 -- 17, Exhibit 12-17.
That will be better.
(Exhibit 12-17, Seven-page e-mail chain, first e-mail to Kathryn Guyton from Ivan Rusyn, dated 2/27/15, marked for identification, as of this date.)
Q. And --
MS. HANLON: If you can --
Q. -- if you can --

MS. HANLON: -- Eric, Eric --
Q. -- take a chance to review the e-mail --
MS. HANLON: I was just going to say, give him just a moment, if you would, to read the document.
MR. LASKER: That's what I just said, I believe.
MS. FORGIE: As much time as you want.
MR. LASKER: You're objecting to my suggesting he read the document, to say he should read the document, but we all agree.
Please take a chance to read through this document, please.
And it's an e-mail, so --
THE WITNESS: Okay. Start at the bottom.
MR. LASKER: -- if you want to go from the back -- toward the bottom would be a little bit more...
(Witness looks at document.)
A. Hmm...
I'll be dammed.
Sorry.
(Witness looks at document.)

A. Okay.
Q. Okay. So Dr. Jameson, this is an e-mail exchange.
It starts out as an exchange between Donna Farmer, who works for Monsanto, and Dr. Guyton, Kathryn Guyton.
And can you identify who Dr. Guyton is for the record?
A. Dr. Guyton is an IARC staff member and she was a responsible individual who coordinated the review for Volume 112.
Q. And as reflected in this e-mail exchange, Dr. Farmer at Monsanto provided some materials to Dr. Guyton in advance of the Working Group 112 meeting on glyphosate for the working group to be able to consider in its assessment of glyphosate, correct?
MS. HANLON: Objection.
MS. FORGIE: I'm just going to object to this.
I don't see in my quick perusal where he is on this e-mail.
MR. LASKER: That's fine.
Q. Correct?
MS. FORGIE: Objection.

MS. HANLON: Objection.
A. It's a memo or an e-mail from Dr. Farmer to Kate Grunyon (sic) saying she's providing some reference -- some papers.
Q. Okay. And one of the -- and we're going to get back to the RAR, the European regulatory document in a moment.
But particularly on page -- the second page of this document, which has the Bates number on the top left of 5036, is an e-mail that Dr. Farmer sent to Dr. Guyton providing her with the now published -- final published version of the Greim paper, correct?
MS. FORGIE: Objection.
A. That's what it says.
Q. Okay. And she also notes that she had previously or Donna Farmer notes that she had previously provided Dr. Guyton with an in press version of the Greim article, correct?
MS. FORGIE: Objection, foundation --
MS. HANLON: Objection, form.
MS. FORGIE: -- beyond the scope.
(Witness looks at document.)
A. It says that she provided an in press version of it and it's now published.

Q. And according to the IARC rules, IARC working groups can consider articles even when they're in press prior to final publication, correct?
A. If they've been accepted for publication, I believe that's correct.
If they can get a -- you know, get a copy from the journal.
Q. Okay. And if we go to the front page of this e-mail chain Dr. Guyton -- and just to be clear Dr. Guyton was -- as you mentioned was one of -- was the individual at IARC who was responsible for getting the various working group members materials for purposes of their review in doing their assessments of the substance they were studying, correct?
A. Correct.
Q. And on February 27, 2015 Dr. Guyton provided the Greim publication to Ivan Rusyn, who is another member of the working group, correct?
MS. FORGIE: Objection, foundation.
A. Ivan was a member of the working group, yes.
Q. And Dr. Guyton sent Ivan Rusyn an

e-mail forwarding along the Greim paper to him, correct?
MS. FORGIE: Objection.
MS. HANLON: Object to form.
(Witness looks at document.)
A. Okay. On the middle of the front page it looks like she was forwarding something to Dr. Rusyn.
Q. And then at the top of the page Dr. Rusyn references the fact that there was a publication in the Critical Reviews in Toxicology that he then reviewed, right?
MS. FORGIE: Objection, calls for pure speculation.
(Witness looks at document.)
A. It's stated here in this that he said that "I looked through the paper."
Q. Okay. And if you go through the e-mail chain that we just looked at, Donna Farmer provided Dr. Guyton with the Greim publication.
And then Dr. Guyton said like I don't have the link, it doesn't work, can you send me a PDF?
Donna Farmer sends him a PDF of the

Greim publication and then Dr. Guyton turns around and forwards that on to Dr. Rusyn, correct?
MS. FORGIE: Objection.
MS. HANLON: Object to form.
MS. FORGIE: Are you asking him to read this or speculate as to what happened?
This is unfair.
(Witness looks at document.)
Q. And, in fact, there's actually even an attachment.
If you look at the very top of the e-mail on the first page, when Dr. Rusyn is then responding back to Dr. Guyton, the attachment is the Greim paper.
It says that right on the attachment line, correct?
MS. FORGIE: Objection, calls for speculation, unless you're asking him to read it.
(Witness looks at document.)
A. I'm still trying to find where you say she went back to Dr. Farmer -- where Dr. Grunyon (sic) went back to Dr. Farmer and said she couldn't down -- get -- download that.

Q. If you go to the second page of the document, 5036, Dr. Guy --

In the bottom e-mail Donna Farmer provides a link to the Greim paper, the online Greim paper at the very bottom of the second page.

Then at the top of the page Dr Guyton says, "We couldn't get the link to work, can you send me a PDF?"

And then the bottom of the first page Donna Farmer attaches the PDF.

MS. FORGIE: And what's the question?

Is there a question?

MR. LASKER: I'm responding to his inquiry as to what the e-mail string says.

MS. FORGIE: Well, wait for a question.

MR. LASKER: I haven't asked a question.

MS. FORGIE: You have or have not?

MR. LASKER: I'm going to ask a question now.

MS. FORGIE: Okay.

Q. Dr. Guyton then forwards on -- and you can also see in the very top e-mail when

Dr. Rusyn responds, that the attachment is the Greim publication.

It's referenced in the attachment line, correct?

MS. FORGIE: Objection, calls for speculation.

(Witness looks at document.)

A. Where is the attachment line, I'm sorry?

Q. On the very top of the document, the very top of the page 5035, "Attachments:

Greim 2015."

Do you see that?

A. Oh, okay.

Yeah.

MS. FORGIE: Do you have the attachment?

A. Okay. I see.

It says it was attached.

Q. Okay. Then Dr. Rusyn responds back to Dr. Guyton saying that he believes that, among other things, that the Greim paper will be of more interest to subgroup 3, not group 4, correct?

A. That's what's stated here, yes.

Q. And subgroup 3 is your subgroup, correct?

A. That's correct.

Q. But you did not, as you previously testified, receive a copy of the Greim paper from Dr. Guyton at IARC prior to the working group meeting in March of 2015?

MS. FORGIE: Objection.

A. That is accurate.

I did not.

Q. And Dr. Rusyn --

So just to get the time frame, Dr. Guyton sends Dr. Rusyn the Greim paper on 8:14 a.m. on February 27th, 2015, as reflected on the first page of this document in the middle, correct?

MS. FORGIE: Wait, where does it say 8:14?

Q. On page 5035, at the middle of the page, Dr. Guyton sends Dr. Rusyn a copy of the Greim publication on February 27th, 2015 at 8:14 a.m., correct?

MS. FORGIE: Objection.

A. Well, I mean this e-mail states, "FYI, do let us know if the new references you'd like

to include in the recent review, Kate."

Q. And so that was February 27th, 2015 at 8:14 a.m., correct?

A. Right.

But I mean all the memo says is, "Do let us know if there are new references you'd like to include in this recent review."

Q. "From this recent review."

A. "From this recent review."

Q. And Dr. Rusyn responds --

MS. FORGIE: Wait.

Were you finished with your answer, Doctor?

A. Well, I'm -- it doesn't say it's the Greim -- you know, it doesn't refer to the Greim paper.

I guess you're assuming that it's the Greim paper.

Q. Well, Dr. Rusyn's e-mail back to her attaches something called the Greim paper, correct?

A. Yeah.

Q. Okay. And we have -- as we're going forward right now, Dr. Ross, who is copied on this e-mail chain and who provided this document

to us is also being deposed, so he'll be able to talk about this e-mail chain as well, so we'll have his testimony on it.
MS. FORGIE: Objection.
Go ahead.
A. No.
I was just going to say it looks like Ivan was carbon copying the member of his subgroup.
Q. Right.
So the members of the subgroup 4 had access to the Greim publication, but the members of the subgroup 3 headed by you did not?
MS. FORGIE: Objection --
MS. HANLON: Object to form.
MS. FORGIE: -- calls for speculation.
A. All I can say is I did not see the Greim paper until I got to the IARC meeting.
Q. Okay. And Dr. Rusyn, who sends his response back to Dr. Guyton about 25 minutes after she sends it to him --
And you can tell that from the date lines on the two e-mails, correct, about 25 minutes later?
MS. FORGIE: Objection.

A. Well, what you've got to realize is that there is six hours difference between France and --
Q. Ah...
A. -- and I think Ivan is in the University of Texas, there's probably seven hours difference.
Q. Okay. Dr. Rusyn refers to the Greim paper as a "polemic piece," correct?
MS. FORGIE: Objection.
A. That's what he says in his first sentence.
I don't know what he's referring to.
Q. Do you believe --
Do you view the Greim publication as a polemical piece?
MS. HANLON: Objection, form.
MS. FORGIE: Objection.
A. You're going to have to define polemical for me.
Q. Do you review --
Do you consider the Greim 2015 publication to be a -- to provide scientific data relevant to an assessment of whether glyphosate causes cancer?

MS. HANLON: Objection to form.
MS. FORGIE: Objection, lacks foundation, calls for speculation.
A. Is that what polemical means?
Q. No, it is not.
A. Well, then I've asked you to define polemical, please.
Q. I'm asking you a different question.
MS. FORGIE: Wait.
Hold on.
A. Oh, okay.
Q. Do you consider the Greim publication to contain scientific data relevant to the question of whether or not glyphosate causes cancer in animals?
MS. HANLON: Objection, form.
MS. FORGIE: Objection, lack of foundation.
A. It contains summaries of data from studies submitted by Monsanto and other industry -- in other industries to regulatory agencies for review for registration.
Q. And as you've already discussed in connection with your review of other documents, you looked at EPA documents that likewise

contained information from underlying studies that had been submitted as regulatory studies for glyphosate, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection to form.
A. Yes.
Q. So again I'll ask you the question I asked you before, do you consider the Greim publication to contain information that is relevant to the question of whether glyphosate can cause cancer in animals?
MS. FORGIE: Objection --
MS. HANLON: Objection, form.
MS. FORGIE: -- asked and answered.
A. It does.
Q. And the Greim publication also had supplemental tables, data tables, we've -- you mentioned previously, correct?
MS. FORGIE: Objection.
A. That's my understanding.
It refers to it in the paper, but the links never worked.
Q. Did anybody during the working group meeting ever provide you access to the data tables that were provided in the supplemental

materials to the Greim publication?
MS. FORGIE: Could I have that question read back, please.
Q. I'll ask it again.
I'll just read it again.
Did anybody during the IARC working group meeting in Lyon provide you with access to the data tables that were included as an online supplement to the Greim publication?
MS. FORGIE: Objection.
A. I think so, but I don't really remember.
Q. Did you make use then of the data contained in those supplemental tables -- well, first of all, strike that.
Did you then review the data that was contained in those supplemental tables?
MS. FORGIE: Objection.
A. No, not at that time.
Q. Well, why not?
A. When we -- okay.
When I arrived at the IARC meeting, the day before the actual meeting starts we have a subgroup chair meeting.
At the subgroup chair meeting is when

I was made aware of the fact that this Greim paper existed.
There was a lot of discussion around the table about if this publication should be even looked at, because it was not received in the time identified in the announcement for submission of data that IARC had for this particular monograph meeting, Volume 112.
The Web site indicates -- it calls for individuals who have any information relevant to the review of any of the chemicals specific for Volume 112 to submit the data to IARC.
And to please submit it at least a month before the date of the meeting so that there is time to distribute the data to the pertinent people, to give the people time to review the data and digest it and include it, if appropriate, include it in their documents.
So the document was not received within that one -- within that time period.
And like I said, I was just made aware of it, my subgroup was just made aware of it the day before the meeting.
So that's what some of the discussion was, is this thing was -- this publication was

submitted too late for us to consider.
Q. And your understanding that the publication was submitted too late is based upon what you were hearing during that meeting; is that correct?
MS. FORGIE: Objection.
A. Well, as far as I knew, the paper had just shown up a day or two before I got there.
I didn't know that it had come any earlier than that.
I wasn't aware of that.
Q. And we have just looked back at Exhibit --
MR. LASKER: Is this 12-17?
MR. KALAS: Yeah.
Q. -- 12-17, which is the e-mail exchange between Dr. Farmer and Dr. Guyton.
And the first e-mail in that chain is dated February 3rd, 2015, so that would be outside of a month before the meeting.
The meeting started on March 4th, 2015, correct?
MS. FORGIE: Objection.
A. I guess.
I don't -- I'm -- I mean the date of

this document is February 3rd.
Q. Right.
So that --
MS. FORGIE: Which document are you referring to?
Exhibit 17?
MR. LASKER: Yeah.
MS. FORGIE: Okay.
Q. So that would then have been a submission that was timely under the IARC rules, correct?
MS. FORGIE: Objection --
MS. HANLON: Object to form.
MS. FORGIE: -- lacks foundation.
A. I mean you'd have to broach that with IARC.
Q. So your understanding from the IARC staff was that you were not to take the Greim publication into account because you were informed that that publication had not been made available to IARC during the time period allotted, correct?
MS. FORGIE: Objection.
A. No.
If you look at the monograph you will

see that the Greim paper was addressed in there.
We summarized as best we could the data with the time that we had, that was contained in the Greim paper.
But I'd have to look to see the exact wording, but basically what we were saying is, we just didn't have time to adequately evaluate the information in the paper.
Q. Okay. And then the data tables that you were provided access to at some point during the working group meeting -- and those -- just to be clear, those are the underlying study data tables with all the tumor counts from those original 14 cancer bioassays on glyphosate, correct?
MS. FORGIE: Objection, unclear what tables.
If you could show him what tables you're referring to.
A. I don't understand your question.
I'm sorry.
MR. LASKER: Let me repeat the question.
Q. You testified earlier that you had access during the meeting at one point or

another to the data tables that were provided on the online supplement to the Greim publication, correct?
A. I --
MS. FORGIE: Wait.
Is there a question?
MR. LASKER: Yes.
MS. FORGIE: What is the question?
MR. LASKER: He is about to answer it.
MS. FORGIE: No.
I'd like to hear the question, please.
Q. You testified earlier that you had access during the meeting at one point or another, and this would be the working group meeting, to the data tables that were provided as part of the online supplement for the publication, correct?
MS. HANLON: Objection.
MS. FORGIE: Objection.
A. I stated that I thought.
I really don't remember clearly that I did.
I thought they may have been shown to me during the meeting.
Q. And -- but you did not then proceed to

actually review and look at the data that was provided in those supplemental tables, correct?
MS. FORGIE: Objection, mischaracterizes his testimony.
A. There was -- the amount of data in the tables was overwhelming.
And it would not have been possible to review those -- that data during the meeting.
Q. And you don't sitting here today know when those data tables were made available to IARC, correct?
A. I do not.
Q. Okay. The -- back to 12-17.
There's also a discussion in that document about the renewal assessment report --
MS. FORGIE: Wait.
Did you say 17 or 18?
MR. LASKER: 12-17.
MS. FORGIE: Oh, I thought you said 18.
MR. LASKER: 12-17, the e-mails.
MS. FORGIE: Yes, it is.
But I thought you said 18.
Q. On 12-17 on the third page of this e-mail, there is a discussion of a renewal

assessment report that had been prepared by the German Federal Institute for Risk Assessment, the BfR, regarding glyphosate, correct?
MS. FORGIE: Objection, foundation, calls for speculation.
MS. HANLON: Join.
A. That's what it states here in this document.
Q. Okay. And during --
First of all, in your review of the materials that were provided to you by IARC in advance of the meeting, did those materials include the BfR renewal assessment report?
MS. HANLON: Object to the form.
A. The BfR --
Q. The German Federal Institute for Risk Assessment, again that's the German regulatory document.
A. I don't recall.
I don't think they were, but I don't recall.
Q. Do you recall having that German regulatory renewal assessment report for glyphosate available to you during the IARC working group meeting when you were in Lyon,

France in March of 2015?
A. It may have been.
I don't recall.
Q. We'll talk a little bit more about that.
A. Is it referenced here?
It's not referenced here in the document, is it?
Q. It's not referenced in the document.
A. Okay.
Q. And if it's not referenced in the monograph, is it fair to say that you then would not have had access to that document in conducting your assessment?
MS. FORGIE: Objection.
A. I don't know.
MR. LASKER: Let me -- we can do it now.
Let's break for lunch.
MS. HANLON: Before we do, I'd like to for the record make an objection to the submission of Exhibit 12-17 on the basis that it calls for speculation as to its truth and veracity, since he was not a party or a participant in the e-mail chain and had

no involvement in its ownership or creation of it.
MR. LASKER: And I would just state for the record that the fact that he was not copied on this e-mail chain is exactly the point, because he certainly should have been.
And the question of why he did not receive an e-mail from IARC providing him with this study so that he would have had it to make his assessments during the working group meeting is one of the questions that I think we have and I guess Dr. Jameson also has.
MS. FORGIE: Now I completely object to that statement --
MS. HANLON: I was going to say, I was making an objection for the record.
MS. FORGIE: -- diatribe.
MS. HANLON: I wasn't looking for testimony as to the response.
Thank you.
MR. LASKER: Well, then stop making objections that provide testimony.
MS. HANLON: Excuse me.

Eric, I have a right to make an objection to the admission of an exhibit.
MR. LASKER: We're off the record.
THE VIDEOGRAPHER: We're going off the video record. The time is 12:40 p.m.
(Luncheon recess: 12:40 p.m)

AFTERNOON SESSION
(Time noted: 1:23 p.m.)
CHARLES W. JAMESON, resumed as a witness, having been previously sworn by the Notary Public, was examined and testified as follows:
THE VIDEOGRAPHER: We're back on the video record. The time is 1:23 p.m.
MR. LASKER: And just for the record, who is on the phone, if anyone?
MS. FORGIE: Hello, is anyone on the phone?
MR. LASKER: I guess we've lost them all.
EXAMINATION BY
MR. LASKER:
Q. So Dr. Jameson, turning back to the subgroup report that you drafted in anticipation of Working Group 112 on glyphosate, I think you mentioned that prior to the meeting that the procedure in your group was that two other members of the subgroup would review the initial draft that was prepared, correct?
A. Correct.
Q. Do you recall who in the subgroup

reviewed your draft of the glyphosate assessment?
A. I don't really recall.
I'm sorry.
Q. Okay. If we had a list of --
Would a list of the working group members help you in identifying who that was?
(Witness looks at document.)
A. Oh, this is for 115.
Q. There's a Dr. Jahnke, there's a Dr. Ser -- no, that's a different person.
Dr. Sergi, Dr. Jahnke, Dr. Calaf, if I'm pronouncing it correctly.
A. Yes.
I think it was...
(Witness looks at document.)
MS. FORGIE: Don't speculate.
A. I can't find their names here.
Consolato, Consolato Sergi, I believe is his name.
Q. Uh-huh.
Yeah.
A. I think he was one of them.
And the other one was Gloria Jahnke, I believe.

I may be mistaken, but I believe it was those two.
Q. And they would have provided you their comments, then would have sent them back to you to incorporate into the draft before you reached the working group meeting; is that correct?
MS. FORGIE: Objection.
A. They would have made their comments, sent the draft back to IARC.
And then IARC would have sent them to me for my consideration.
Q. Okay. And do you recall receiving comments back on the draft and incorporating them to the extent that you thought appropriate?
A. Correct.
Q. Okay. And then if I understand correctly, once the working group meeting is convened in March of 2015 -- 2015 in this instance, the first half of the week you meet solely within your subgroup, maybe after the first initial hi, we're all here, but then you have subgroup meetings for the first few days, correct?
MS. FORGIE: Objection.
A. No.

Q. Okay. So then how --
Correct me where I'm wrong.
A. The entire working group meets in a plenary session the morning of the first day --
Q. Okay.
A. -- for introductions and some guidance from IARC as to how the meeting should be -- proceed.
Going through the review process in detail, so everybody knows it, because there's always somebody there that is new to the process.
Usually that lasts the morning and then the afternoon is when we break up into the subgroup meetings.
Then every day after that for the first -- for the next -- I believe there's three days, every morning you meet in the plenary session, the entire working group meets in the plenary session in the morning for about an hour just to -- each subgroup chair usually gives a brief update of how they're doing, any administrative things that need to be taken care of.
And then you break out into the

subgroups for the rest of the day.
And then it is usually the fifth day.
Depending on how the progress has been made, it may be a plenary session at the beginning of the day, then break into subgroups.
But then by the afternoon you start in plenary session to discuss -- for the whole working group to start discussing all of the reports.
Q. Okay.
A. And from then on it's plenary sessions.
Q. Got it.
And when you then start meeting in those sort of midweek -- in those plenary sessions, that's at a point in time where the subgroups have finished their work sufficiently to be able to provide their assessment to the plenary for a full of whatever the compound is at issue; is that correct?
MS. FORGIE: Objection.
A. I'm sorry, say that again.
Q. Sometime about the middle of the week you reach a point where the subgroups have completed their substantive work to the extent

that they're now able to provide their assessment to the plenary session for the then entire working group to consider the compound, correct?

MS. FORGIE: Objection.

A. Yes.

Q. Okay. And would --

In that plenary session, is it the person who is providing the subgroup assessment for whatever compound is at issue, is that the person who originally drafted the report, who would then tell the plenary this is what we have determined or would it be the subgroup chair?

A. It depends on the subgroup chair.

Some subgroup chairs like to report for the group and some subgroup chairs will ask the individual if -- if they're talking about a specific compound or chemical, then he would ask the person who drafted it to speak to it.

But in my case, I usually speak for the group.

Q. And required to state it doesn't matter because you were both.

And in your presentation with respect to glyphosate to the plenary session

initially -- and I recognize there are things that go on after that -- but in the initial presentation to the plenary session the subgroup's analysis of the animal cancer bioassay data was that that data provided limited to inadequate evidence of carcinogenicity, correct?

MS. FORGIE: Objection.

A. As I remember, I think at one of the plenary sessions on the third or fourth day they were going around, and since we'd enough time to work on all the -- all of the documents, they were asking the subgroup, well, have you come up with a preliminary evaluation?

And so I think it was at that time that we -- that I said specifically for glyphosate, that the data was looking to be limited.

Q. And was it limited to inadequate or do you not recall --

A. I -- you know, I can't imagine I would have said limited to inadequate, but I -- I know I said it was at least limited.

Q. Okay. Do you recall --

And obviously the plenary session,

that is, just to be clear, not only are the members of the working group there, but the observers are there as well, outside observers, right, at those sessions, correct?

MS. FORGIE: I'm objecting to the plenary session questions, that's outside the scope of what you asked the judge for.

And Monsanto had a representative, Dr. Sorahan, present during that section.

And, in fact, in your brief which we've marked as Exhibit 6, I believe --

MR. LASKER: First of all, this is no longer an objection.

And I want to make sure the videographer is taking this time away from plaintiffs counsel because they are loading up the record now with speaking objections.

There is no objection.

There is no instruction not to answer the question based on scope.

I understand your objection.

It does not change the question.

MS. FORGIE: I have not even finished my objection.

MR. LASKER: I understand.

This is not -- this is out of your time.

MS. FORGIE: The objection is that in the exhibit it stated, "Monsanto expects Dr. Jameson will be able to testify about the scientific debate and key findings that led to the animal subgroup's change in evaluation," and that's our objection.

If you want to give me a standing objection to everything outside of the animal subgroup, that's fine, otherwise I'll continue to object.

MR. LASKER: I will give you a standing objection.

I don't agree your objection is proper, but I'll give you a standing objection.

MS. FORGIE: Okay.

Q. So anyway just to be clear, the plenary session is when you have the outside observers who are also watching what's going on in addition to the working group members, correct?

A. The outside observers are present at all the plenary sessions, yes.

Q. And is it your testimony today that you did not state that the animal data for glyphosate was limited to inadequate or that you can't recall whether you stated that?
A. I do not recall saying limited to inadequate.
Q. Okay. Your recollection is limited?
A. My recollection is that I said limited, but...
Q. And just so the record is clear, this would have been after the two to three-month period that you spent analyzing the studies, drafting up the initial submission, having the review of the two other members of the animal subgroup, incorporating their comments, and then having the first three days of meetings with the animal subgroup, correct?
MS. FORGIE: Objection.
A. It would have been after that period, yes.
Q. All right. Do you recall any discussions among the subgroup members prior to that plenary session in which you were discussing whether the animal data for glyphosate should be classified as limited or

classified as inadequate?
A. I don't remember the exact discussions.
As I recall, the discussions were that the evidence for the -- I think there were a couple of members there that felt the evidence was sufficient, to be honest with you.
I think it was -- again, I -- you know, I don't know how much is fact and how much is opinion.
I don't know what to say about the studies.
But I think there was some -- some people in the -- on the subgroup who felt that the data for the -- the data for the mice, where the kidney tumors were observed in the CD-1 mouse, those tumors were so rare that they felt that that was sufficient evidence.
Q. Do you recall --
Now you had served -- we've already discussed you had served as chair for animal subgroups on prior working groups, correct?
A. Correct.
Q. So at the time that you made the presentation to the plenary session with the

preliminary assessment, as you recalled today of limited for the animal data for glyphosate, you were aware of and understood how the data was to be interpreted under IARC's preamble, correct?
A. Correct.
Q. As I understand the process -- and correct me --
After you had that initial plenary session and then you start meeting in plenary, each morning of the plenary session there will be a new draft that is provided to the individuals who are in attendance of each of the sections of each of the various compounds being looked at, correct?
MS. FORGIE: Objection.
A. Not necessarily a new draft every morning.
Usually what happens is the -- you'll have a -- the plenary sessions are set up so that you address one chemical at a time.
And usually what it is is you go through the chemical and then comments and suggestions from the whole working group are taken into account.
And then you go -- they go back to

the -- the subgroup takes it back and addresses the comments of the whole working group, redrafts it, and then that goes to the next day.
But there are --
Q. On days there wouldn't be a --
A. Some days -- sometimes you finish up a compound, you know, on the Monday before the final day or on the Sunday before the final day.
It's not -- and so those don't come back, that's all I'm saying.
Q. Right.
And then every evening after the plenary session there is a meeting that is solely among the IARC staff and the chairs of the subgroup and the overall chair, correct?
A. That's correct.
Q. And observers are not allowed to attend those meetings, correct?
A. That's correct.
Q. Was Christopher Portier, he was the invited specialist to Working Group 112, was he in attendance at those evening sessions?
A. I don't recall that he was.
Q. Was he -- during the time he was there was he in meetings with your subgroup or was he

bouncing around between subgroups, do you recall?

A. He was bouncing around.

I think he concentrated mostly on the mechanisms group, but he did come in once or twice in the animal section just to hear some of the discussion or to ask a question.

MR. LASKER: Let me show you a document that I have no idea what the number is.

Again, 12-19?

MR. KALAS: 18, I believe.

MR. LASKER: 18.

(Exhibit 12-18, Multipage document entitled Vol 112-Monograph 04-Glyphosate, Section 3, 2nd Draft.rev4, bearing Bates stamp Nos. MONGLY01616857 through MONGLY01616874, marked for identification, as of this date.)

Q. And this is a document that's been produced in this litigation bearing the Bates No. MONGLY01616857 and continuing through to 874.

And, Dr. Jameson, please take your time to take a look at this document.

(Witness looks at document.)

A. Okay.

Q. And so we were just talking about various drafts of the monograph that would be prepared as the meeting was going on in Lyon, France, correct?

A. Okay. Uh-huh.

Q. And this would be one of the drafts then of the Section 3 on glyphosate, the animal cancer bioassays section on glyphosate, correct?

A. I...

MS. FORGIE: Objection.

A. I mean it appears to be in the format of a draft for the IARC monograph, yes.

Q. Okay. And obviously -- well, strike that.

As you discussed, there were changes that took place in the draft for the animal subgroup's assessment of glyphosate during the course of the meeting over that week long period, correct?

MS. FORGIE: Objection.

A. Yes.

Q. Okay. The -- and I want to direct you also -- you can have both of these at your -- at

the ready, if you will -- to the IARC monograph, the final IARC monograph.

I'm sorry, I don't recall the number -- 12-15.

And if we can go to page 30 of 12-15.

And that is starting off -- that is the same section then in the final monograph starting on page 30 as the document that we've marked as 12-18.

It's covering the same section, correct, 3, and "3.1 Mouse," and then "3.1.1 Feed" versus "Dietary administration," correct?

MS. FORGIE: Objection.

A. Okay. Well, this document says "3.1.1 Feed" and the actual monograph is "3.1.1 Dietary administration."

Q. Right.

A. Yes.

Q. And the first study that is being discussed both in the draft document and in the final monograph is this study in CD-1 mice, correct?

50/50 with same doses, referring to the EPA 1985 document?

(Witness looks at document.)

A. It's -- yeah.

Yeah, this draft says the doses are 1,000 -- this document identified as the "2nd Draft.rev4" says the doses were zero, 1,000, 5,000, and 30,000.

But it doesn't have the same information in this as it is in the final monograph.

Q. I understand, but it seems to be referring to the same study.

And we'll go through, as we go through, but I want to just confirm this is talking about a study that was addressed in some EPA documents in 19 -- in the mid-1980s and it's the same?

A. It appears to be, yeah.

MS. FORGIE: Objection.

MS. HANLON: Object to the form.

Q. Now let us just focus on the final monograph for a moment.

And as we discussed previously you had for purposes of your review or an assessment, you had EPA review documents that discussed underlying animal studies, correct?

MS. FORGIE: Objection.

A. We had copies of memos from the EPA that discussed their review of studies submitted on glyphosate, yes.
Q. And then in your final monograph you actually cite to those studies.
And I think you have --
A. Right.
Q. -- EPA 1985, EPA 1985b, EPA 1986, and then EPA 1991, I believe.
Although in this section it's actually just '85a, '85b, and '86, correct?
A. Correct.
Q. Okay. So let's mark and just so it's clear, the index then to the monograph actually has the references and has a cite that has a link in which you can find the document that's being cited.
So people who can read this can click on that link and find the document, correct?
MS. FORGIE: Objection.
A. They can click on the link, yes.
MR. LASKER: Okay. And let's mark a turn --
(Discussion off the record.)
MR. LASKER: So the first document

we'll mark which corresponds to 1985a in the monograph is an April 3rd, 1985 EPA memo.
(Exhibit 12-19, Five-page document entitled US EPA Archive Document, with attached Memorandum to Robert Taylor from William Dykstra, dated 4/3/85, marked for identification, as of this date.)
MR. LASKER: Okay. So that's 12-19.
(Discussion off the record.)
MR. LASKER: And the next document, which will be 12-20, then is the EPA memo that comes up for 1985d (sic).
And it's dated December 4th, 1985, so that chronologically makes sense also to be the second 1985 document.
(Exhibit 12-20, Three-page document entitled US EPA Archive Document, with attached Memorandum to William Dykstra from Louis Kasza, dated 12/4/85, marked for identification, as of this date.)
(Discussion off the record.)
MR. LASKER: And then the next in line, which will be 12-21, is the 1986 EPA memo and it's dated -- it has a date of -- some handwritten dates on it, it says it's

March 11th, 1986.
But there's also signatures in January and February of 1986 by individuals as well, but that will be 12-20.
THE REPORTER: 12-21.
MR. LASKER: Yeah, I'm sorry, 12-21. Thank you.
(Exhibit 12-21, Ten-page document entitled US EPA Archive Document, with attached Memorandum to Robert Taylor from William Dykstra, dated 3/11/86, marked for identification, as of this date.)
(Witness looks at document.)
THE WITNESS: Okay.
Q. And so am I correct then in my understanding from the final monograph that these were the three EPA memos that -- upon which the IARC -- or that IARC had and that the working group had with respect to this mouse study which was, I'll represent, the 1983 Monsanto mouse study?
MS. FORGIE: Objection.
A. According to the EPA document numbers and the reference, they correspond to what's here, yes.

Q. So these would be the three memos then that you had and that IARC had available to it to obtain data regarding this mouse study, correct?
MS. HANLON: Objection to form.
MS. FORGIE: Objection.
A. These appear to be the ones that's referenced in the document, yes.
Q. And these are the only documents that you had and that IARC reviewed for information regarding the 1983 Monsanto mouse study, correct?
MS. FORGIE: Objection.
A. As I indicated before, there could have been other memorandas regarding these particular studies that didn't contain any actual data that was available.
Q. But these were the only documents that you had regarding the 1983 mouse study that provided any data, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection.
A. According to what's -- the references here, yes.
Q. And references here are to the

monograph?
A. To the monograph, correct.
Q. And these memos discuss findings with respect to renal tumors, correct?
A. That's what it says, yes.
Q. Did IARC have any information -- well, let me take a step back.
When you do an animal cancer bioassay the investigators will look at a large number of different tissues in the standard animal study, correct?
A. Correct.
MS. FORGIE: Objection.
Q. Upwards to 50 different tissues will be examined, correct?
MS. FORGIE: Objection.
A. That's correct.
Q. And IARC in its assessment of this 1983 mouse study, the only data that you looked at and that IARC looked at were the data with respect to renal tumors, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
A. In this study?
Q. Yes.

A. As best I can recall, yes.
Q. Okay. The final monograph -- and if you can look at pages 33 to 34 -- or actually it's -- I'm sorry, that's wrong.
Page 30 and then it carries over to page 33, in discussing this 1983 Monsanto mouse study the IARC monograph states that "there was no data on tumors of the kidney provided for female mice," correct?
MS. FORGIE: Objection.
(Witness looks at document.)
Q. I'm sorry, at the bottom of page 30 and the top of page 33.
(Witness looks at document.)
A. Yeah, the document states there were no data on tumors for the kidneys of the female mice.
Q. Now obviously the 1983 mouse study would have looked at the kidneys of both the male mice and the female mice, correct?
MS. HANLON: Object to form.
MS. FORGIE: Objection.
A. You would expect them to if they studied the female mice.
Q. And why did the IARC working group

then not consider the findings with respect to renal tumors in female mice?
MS. HANLON: Objection, form.
A. To no tumors in female mice?
MS. FORGIE: Objection.
Q. Why did the IARC working group not consider the findings with respect to renal tumors in female mice?
MS. HANLON: Objection, form.
MS. FORGIE: Objection.
A. But the report says there was no data.
Q. So it's your understanding that the EPA documents that you reviewed did not provide data with respect to female mice and renal tumors?
MS. FORGIE: Objection.
A. I don't know.
I'd have to look through the documents to see if they did.
Q. Okay. Well, let me see if I can help you there.
If you could look at document 12-21.
MS. FORGIE: I think he is entitled to look at as much as he wants to, not just what you point out to him.

MR. LASKER: Okay. But the data is what the data is, and he can look at what I direct him to.
And then if he thinks there is different data elsewhere, he can look at that elsewhere.
Q. If you can look at page 5 of Exhibit 12-21. 12-21.
MS. FORGIE: I'm sorry, what number did you say, page 3?
MR. LASKER: Page 5.
MS. FORGIE: Page 5.
(Witness looks at document.)
Q. And this is, if you look in the middle of the page there's a discussion that you can see there, data provided for male mice and renal tumors and also for female mice.
Do you see that?
A. Where is this?
Q. If you start in the middle of the page, "In response to your letter of September 16th," do you see that?
A. Okay.
Q. If you read through that paragraph.
(Witness looks at document.)

MS. FORGIE: And, Doctor, you can take as much time as you want to read the whole -- all three of these.

(Witness looks at document.)

A. Okay. This information is taken evidently from a letter from a Dr. Robert Olson to Monsanto.

Q. Correct.

A. I mean I don't know who Dr. Olson is.

Q. Correct.

So did you discount certain information in the document and not consider some data that would support the document based upon an assessment of who was being quoted in the various parts of the document?

MS. FORGIE: Objection.

(Witness looks at document.)

Q. Dr. Jameson, did you --

MS. FORGIE: Wait a minute.

He is reading and he is entitled to read if he --

MR. LASKER: I understand.

There's a question outstanding.

I don't even know if he remembers what the question is.

The question does not --

MS. FORGIE: We're going to read it first.

It's not fair.

MS. HANLON: I request that you allow him to read through the document and he will respond.

MR. LASKER: Okay. Let's go off the record.

And, Dr. Jameson, if you want to read through these documents you can take your time.

THE VIDEOGRAPHER: We're going off the video record. The time is 1:57 p.m.

(Recess taken.)

(Exhibit 12-22, Multipage document, first page is entitled US EPA Archive Document, with attached Memorandum to Robert Taylor and Lois Rossi, dated 10/30/91, premarked for identification, as of this date.)

THE VIDEOGRAPHER: We're back on the video record. The time is 2:08 p.m.

BY MR. LASKER:

Q. So during the break we marked another

exhibit and I just marked that for the record Exhibit 12-22.

It is an EPA document, the second peer review of glyphosate, dated October 1991.

And that also is a document, Dr. Jameson, that IARC considered in its assessment of the animal cancer bioassays for glyphosate, correct?

A. Correct.

Q. And during the break did you have the opportunity to review the EPA documents that were at your disposal with respect to whether or not they provided data on renal tumors in female mice in this 1983 Monsanto study?

A. I looked at the reports, yes.

Q. And the reports do indicate that there were no renal tumors found in female mice in that study, correct?

A. That's correct.

Q. So the monograph stating that no data were provided for female mice, you guys just missed that, correct?

MS. FORGIE: Objection.

A. It's poorly worded.

I mean they didn't give any -- they

didn't list any incidences in the table because there were none.

But it's poorly worded, yes, I'll admit to that.

Q. Okay. And then there's also --

And just to be clear then, is it your recollection that you are aware that there were no findings of renal tumors in the female mice in the 1983 mouse study at the time that you drafted the monograph and just poorly worded it or that you did not -- were not aware of the data on female mice?

A. I think it is probably -- I think it's just poorly worded.

Q. So your recollection is that you were aware of the fact that there were no renal tumors in the female mice?

A. In the female mice, right.

Q. But then you worded it in a way that it suggested that there is no data?

A. There is no data, right.

Q. And with respect to the final monograph you also state that -- again on page 30 -- that survival -- on the bottom of page 30 on this right column you state that

"survival in all dose groups."
And this is about the seventh line from the bottom on the right column, "survival in all dose groups was similar to that of controls for this 19883 mouse study," correct?
A. That's what it says here.
Q. Okay. And the issue of survival and the reason it would be set forth in this monograph and other discussions of animal studies is obviously if an animal lived longer there is more time for them to get tumors, correct?
MS. FORGIE: Objection.
A. Correct, that's one of the things.
Q. And so when you're analyzing the study you want to know if the survival is the same between treatment groups and control groups in order to properly analyze the data from that study, correct?
A. Yes, that's one of the data points.
Q. Okay. And the EPA documents that you reviewed in connection with preparing this monograph provides data on survival in the various treatment groups for this mouse study, correct?

A. I don't know. I'd have to go look.
Q. Okay. Well, let me ask you, if you could, to look at 12-19, the 1985a.
And that was one of the documents that you were just reviewing during the break, correct?
A. Okay.
Q. And on the second page of this document there is a table, "Cumulative Mortality," correct?
A. Correct.
Q. And that table provides information on survival as between the different treatment groups in the 1983 mouse study, correct?
A. Correct.
Q. And the table reports that as of 24 months there was higher survival among the highest dosed group where the three renal tumors were noted as compared to the other treatment groups, correct?
A. I'm sorry, say that again.
I was reading something.
Q. The table on 1985a, that was one of the documents that you relied upon in preparing the IARC monograph, reports that there was

greater survival in the highest dosed group of animals, of mice, in the 1983 mouse studies as compared to the other treatment groups and as compared to controls, correct?
A. There's greater survival in the treated group --
Q. The highest treated group?
A. -- in the highest treated group than in the controls?
Q. Correct.
A. That's what you're saying it says here?
Q. Yes.
A. Oh, okay.
Q. So that I'm reading that table correctly, correct?
A. This table says there's more alive after 24 months in the high dose group than there was in the control, correct.
Q. There were depending on how you measure, there's something like 70 percent greater survival -- I don't know how to do the math here -- well, there is -- there were -- there's greater survival --
Strike that, let me restate it.

There was greater survival in the highest dose group of 30,000 parts per million also as compared to the medium dose group and as compared to the low dose group, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection.
Eric, are we talking about the treated or the untreated?
Q. We're talking about for the 1983 mouse study there was greater survival of the mice in the highest dose group as compared to the medium dose group, correct?
MS. FORGIE: Objection.
A. The table appears to show that, yes.
Q. And there was higher survival in the highest dose group than there was in the low dose group, correct?
(Witness looks at document.)
A. Oh, than in the low dose -- okay.
Q. Correct?
A. It appears -- the table does -- appears to show that, yes.
Q. Okay. And then as we said, greater survival in the highest dose group as compared to controls, correct?

MS. FORGIE: Objection.
A. Okay. Yes.
Q. And so the data with respect to survival shows that there was a difference in survival between the highest dose group and the controls, correct?
MS. FORGIE: Objection.
A. They survived better than the controls.
Q. Okay. So in the IARC monograph where it states that "survival in all dose groups was similar to that of controls," is that something that was poorly worded as well?
MS. FORGIE: Objection.
A. I'm not supposed to give you my opinion in this deposition.
Q. Did --
Were you aware at the time that you drafted this statement in the IARC monograph that "survival in all dose groups was similar to that of controls," were you aware of the fact that as reported in this 1985 EPA document that you considered, survival was in fact greater in the highest dose group than in any mouse studies compared to controls?

MS. HANLON: Objection.
MS. FORGIE: Objection.
A. Did I know that survival was greater in the treated than in the controls?
Q. In the highest dose group as compared to controls.
MS. HANLON: Objection, form.
A. Well, that's what the table here says.
Q. Okay. So at the time that you wrote in the IARC monograph that survival in all dose groups in this 1983 mouse study was similar to that of controls, you were aware that there was greater survival in the highest dose group, correct?
MS. FORGIE: Objection.
A. There were more alive in the high dose group than in the controls after 24 months, that's what the table says.
Q. Okay. And just so we're clear, with respect to the findings of renal tumors, adenomas, or carcinomas in this 1983 mouse study, three of those tumors were found in the highest dose group, correct?
A. That's correct.
Q. The IARC monograph notes that the EPA

convened a pathology working group to evaluate the renal tumors in the male mice in this study, correct?
A. The EPA did, yes.
Q. Okay. And can you just for the record so it's clear, do you understand from your time at NTP and did you understand at the time when you were working on this monograph, understand what a pathology working group is?
A. Yes.
Q. What is a pathology working group?
A. A pathology working group is like a peer review whereby pathologists, mostly for bioassay study they're veterinary pathologists, a group of qualified veterinary pathologists get together, review slides at the same time and -- to evaluate the diagnosis of the tissues that they've been given to review.
Q. And if we can look at the document that's been marked as Exhibit 12-21, which is the 1986 EPA document that was available to you in preparing the IARC monograph.
And particularly, and I know that you reviewed this during the break, at pages 7 through 9 of Exhibit 12-21.

That is where you had obtained the information -- and "you" being IARC and yourself as chair of the animal subgroup -- is where you obtained the information about the pathology working group review of this mouse study, correct?
MS. FORGIE: Objection.
A. Yes, this is where we would have found the information on the PWG.
Q. Okay. And on page 7 of Exhibit 12-22 -- I'm sorry, 12-21, the 1986 EPA document states, and this is the second paragraph to the bottom, "The PWG blindly examined coded slides without respect to treatment group, of all cases or" -- I suppose it should be of -- "renal tubular cell tumors and all discrepancies and diagnosis among the OP, original pathologists, Dr. Kuschner and the chairperson of the renal tubular cell tumors and renal tubular cell hyperplasias.
The consensus viewpoint of the participants is recorded in Appendix A."
Do you see that?
A. Uh-huh.
Q. And just so that I understand and the

record is clear, what does it mean to say that the "PWG blindly examined coded slides"?
A. It means that they were given the slides and they didn't know from which dose group those particular slides came from.
Q. And I think we discussed this earlier, but the pathology working group in conducting its analysis of the 1983 mouse study had available to it a greater amount of data regarding that study than IARC had in conducting its assessment, correct?
MS. HANLON: Object to form.
MS. FORGIE: Objection.
A. Who had a greater amount of data?
Q. The pathology working group that reviewed the slides and reviewed the original study materials under the 1983 mouse study had greater amount of data available to it in assessing the findings in the mouse study than IARC had in conducting its assessment in 2015 of the same study, correct?
MS. HANLON: Objection, form.
MS. FORGIE: Objection.
A. I don't know.
I don't know what was available to the

PWG, so I really can't answer that.
Q. Well, you know that they had the actual slides, correct?
A. Well, they had the actual slides, but you said they had more data, too.
Q. Do you know what information the PWG looked at from your review --
A. I'm not -- I don't know what they had to look at, no.
Q. Okay. But they did look at all the tissue slides for the kidney tumors, correct?
MS. FORGIE: Objection.
A. Well, it explains it in this document what they looked at, yes.
Q. And that would allow them also to look at whether there is evidence of preneoplastic lesions in the kidneys, correct?
MS. HANLON: Objection, form.
MS. FORGIE: Objection, speculation.
A. I have no idea what they looked at when they did the PWG.
Q. Okay. And I refer you to page 9 of this document.
And this, again, is talking about the findings of the PWG, correct, the pathology

working group convened by EPA?
(Witness looks at document.)
MS. HANLON: What was your question to him?
Q. That this is -- page 9 is a continuation of the pathology working group's findings, correct?
A. "The following points were taken into consideration in reaching its decision," that's what it says, yes.
Q. So the pathology working group, as set forth in this page, which is one of the documents you relied upon in providing -- in the IARC monograph, talks about all the different factors that the pathology working group considered in reaching its assessment, correct?
MS. FORGIE: Objection.
A. Okay. That's what it says.
Q. And, for example, it talked about the fact that there were no -- number -- technically d), no nephrotoxic lesions or preneoplastic changes in the kidneys of these -- of a -- hold on a second -- three-month sub-chronic toxicity study, correct?
(Witness looks at document.)

A. I mean it says that the renal toxicity was not noted in the three-month sub-chronic toxicity study.
But I have no idea what study they were referring to.
It was reported in 1979, but I don't know if it's a sub-chronic study that was done before this study or that they just knew of a sub-chronic study or -- I don't know what they're referring to there.
MR. LASKER: So we're going to have to take a break because we're reaching the end of the -- we're reaching the end of the tape, sorry.
THE VIDEOGRAPHER: This will be the end of video media disk No. 3. The time is 2:24 p.m. We're going off the video record.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record. This is video media disk No. 4. The time is 2:31 p.m.
BY MR. LASKER:
Q. Dr. Jameson, when we broke we were looking at page 9 of Exhibit 12-22 -- 12-21.
And one of the factors that the EPA

1 pathology working group noted was that compound
2 related nephrotoxic lesions including
3 preneoplastic changes were not present in the
4 1993 mouse study, correct?
5 MS. FORGIE: Objection.
6 A. That's what it states here in this
7 document, yes.
8 Q. And then if you look at page 7 under
9 "Conduct of the PWG Review" it states, "Prior to
10 the pathology working group review, the
11 Chairperson reviewed the pathology incidence
12 tables, the original pathologist's narrative,
13 pertinent individual animal records, and all
14 tissue sections of kidneys from male mice,"
15 correct?
16 A. That's what it says here, yes.
17 Q. So is it fair to say --
18 I'm sorry.
19 And to correct the record, it's the
20 1983 mouse study, not the 1993 mouse study,
21 Doctor.
22 A. Okay.
23 Q. And it's fair to say then that the
24 pathology working group had more information
25 available to it in reviewing the renal tumor

1 findings in the 1983 mouse study than you had
2 and that IARC had in 2015, correct?
3 MS. HANLON: Objection, form.
4 A. Based on what they say here it sounds
5 like they had more information, yes.
6 Q. And on page 8 of this document, 12-21,
7 the pathology working group's conclusions are
8 stated.
9 And it states that, "The PWG firmly
10 believes and unanimously concurs with the
11 original pathologist and reviewing pathologist,
12 that the incidence of renal tubular cell
13 neoplasms in this study are not compound
14 related," correct?
15 A. That's what this states, yes.
16 Q. Okay. So IARC reached a different
17 conclusion than the pathology -- EPA pathology
18 working group --
19 MS. FORGIE: Objection.
20 Q. -- correct?
21 A. Yes.
22 Q. And the -- if you go back to the
23 exhibit, I'm sorry, 12-18, which is the draft of
24 the IARC monograph section on the animal cancer
25 bioassays, at the bottom of the first page,

1 which is the Bates 16857, in discussing the 1983
2 Monsanto mouse study the draft monograph states
3 for the last sentence, "The report from the PWG
4 also indicated they firmly believe and
5 unanimously concur with the original pathologist
6 that the incidences of renal tubular-cell
7 neoplasm in this study are not compound
8 related."
9 And also, "The EPA (1991) stated they
10 did not feel this lesion was compound related."
11 Do you see that?
12 A. That's what it states here.
13 Q. And if you go to the final monograph,
14 the final IARC monograph, which is
15 Exhibit 12-3 --
16 MR. LASKER: 12-15?
17 MR. KALAS: Yeah.
18 Q. -- 12-15 and you look at the
19 discussion of this same mouse study, it appears
20 on page 30 and carried over to page 33, that
21 statement that was in the draft monograph at
22 some point indicating the EPA pathology working
23 group's conclusion and the EPA's conclusion that
24 the lesions, the renal tumors seen in this
25 study, were not compound related.

1 That has been taken out of the IARC
2 monograph as it appears in its final form,
3 correct?
4 MS. HANLON: Objection, form.
5 MS. FORGIE: Objection.
6 A. I don't know.
7 I'd have to read this.
8 (Witness looks at document.)
9 MR. LASKER: We can go off the record
10 and let the doctor read it.
11 THE VIDEOGRAPHER: We're going off the
12 video record. The time is 2:35 p.m.
13 (Recess taken.)
14 THE VIDEOGRAPHER: We're back on the
15 video record at 2:36 p.m.
16 BY MR. LASKER:
17 Q. So Dr. Jameson, the statement in the
18 draft of the IARC monograph for glyphosate,
19 which notes that the EPA pathology working group
20 and the EPA itself had concluded that the renal
21 tumors found in the 1983 mouse study were not
22 related to glyphosate, those statements were not
23 included in the final IARC monograph, correct?
24 MS. FORGIE: Objection.
25 MS. HANLON: Objection to form.

A. It appears to be that way, yes.
Q. And do you know who took that language out of the monograph?
MS. FORGIE: Objection.
A. No.
Q. Do you know why that language was taken out of that monograph?
MS. FORGIE: Objection.
MS. HANLON: Objection.
A. I don't recall.
Q. The draft -- or strike that.
The final IARC monograph states at the middle of page 33, the second column, provides tumor counts from that 1983 mouse study and particularly notes that the findings of combined adenoma and carcinoma of the renal tubule of 1 out of 49 for the controls, 0 out of 49 for low dose, 1 out of 50 for the mid dose, and 3 out of 50 for the high dose was -- reflects a statistically significant trend.
Do you see that?
A. Yes.
Q. Now that information, that statistical analysis is not contained in the draft monograph, and you can look at that same section

on page (sic) 12-18.
Let me ask you first, do you recall yourself having conducted that statistical analysis to determine whether or not the trend --
And the data is on the first page, if you will, fourth line from the bottom, 1 out of 49, 0 out of 49, et cetera.
A. Okay.
Q. Do you recall yourself having performed the statistical analysis that is set forth in the final monograph stating that this is a statistically significant trend for renal tubule adenomas and carcinomas?
A. I don't recall doing that, no.
Q. Okay. Let me ask you to look at, again, the EPA document that was available to you and that you reviewed.
This is the 1986 EPA document, it's 12-21.
And particularly if you can look at page 9 again, which was that last page that we were looking at with respect to the pathology working group.
(Witness looks at document.)

Q. And they state in their analysis at b) -- I'm on page 9 -- that the -- and again, if you look at page 8, they're referring to that same data that's set forth in the IARC monograph of 1013.
And they state that that data does not reflect a statistically significant trend, do you see that?
A. I see that -- where the statement says that, yes.
Q. Do you know how the IARC's working group reached a contrary conclusion with respect to the statistical -- with respect to the linear trend than EPA had calculated when it reviewed this data?
MS. FORGIE: Objection.
A. I don't.
Q. Do you recall whether there was any conversations within the IARC working group of the difference between what the EPA had concluded in looking at that same data and what is set forth in the final monograph as far as statistical significance?
MS. FORGIE: Objection.
A. I don't recall the -- a conversation

concerning that, no.
Q. Part of the or one of the determining factors for IARC and for your review of the animal data under IARC or the IARC rules is identifying whether or not there is a statistically significant increase in tumors found in an animal study, correct?
A. Correct.
Q. And it is actually important in determining how to classify something, to know whether or not there is a statistically significant increase, correct?
MS. FORGIE: Objection.
A. Yes.
Q. And the finding that is set forth in the monograph of a statistically significant increase in renal tumors in the mice of the 1983 mouse study was then one of the factors that determined how glyphosate was characterized with respect to animal cancer bioassays and cancer, correct?
A. Yes.
Q. Okay. But sitting here today you cannot state why it is that the IARC reached a different conclusion with respect to statistical

1 significance in the 1983 mouse study than the
2 EPA did, correct?
3 MS. FORGIE: Objection.
4 A. I can't -- I can't give you my opinion
5 of what that data means because this is a
6 fact...
7 Q. I'm asking you the fact, do you know
8 why the EPA and the IARC calculation of
9 statistical significance is different?
10 MS. HANLON: Objection, form.
11 MS. FORGIE: Objection.
12 A. Sitting here today I can't -- I don't
13 know.
14 Q. Let's move on to the second study
15 that's considered in the IARC monograph for
16 mice.
17 And this is a study that you discuss
18 on page 33.
19 And here you're referring to the JMPR
20 2006.
21 It's the second column, the bottom
22 paragraph.
23 A. Uh-huh.
24 Q. And this is -- for this mouse study
25 the source of information was a review that was

1 conducted by the World Health Organization,
2 correct?
3 A. Correct.
4 MR. LASKER: Let's mark as the next
5 document in line.
6 THE REPORTER: 23.
7 (Exhibit 12-23, Multipage document
8 entitled Pesticide residues in food - 2004,
9 Evaluations 2004, Part II - Toxicological,
10 marked for identification, as of this date.)
11 (Witness looks at document.)
12 Q. And if you can --
13 MR. LASKER: We'll go off the record
14 so you have a chance -- let's go off the
15 record so the doctor has a chance to look
16 through this document.
17 MS. HANLON: Thank you.
18 THE VIDEOGRAPHER: We're going off the
19 video record. The time is 2:44 p.m.
20 (Recess taken.)
21 THE VIDEOGRAPHER: We're back on the
22 video record. The time is 2:53 p.m.
23 BY MR. LASKER:
24 Q. Okay. So Dr. Jameson, the document
25 that I handed you prior to the break, which is

1 12-23 and you've had a chance to review, that is
2 the 2006 copyrighted document, although 2004 on
3 its face, that provided you and IARC with
4 information regarding the second mouse study
5 that is discussed in the monograph at page 33,
6 correct?
7 A. Correct.
8 Q. And this is the only source of data
9 from that study that IARC had at its disposal,
10 correct?
11 MS. FORGIE: Objection.
12 MS. HANLON: Object to form.
13 A. To the best of my recollection, this
14 is the only one I saw.
15 Q. Okay. And as indicated on the JMPR
16 document on pages 121 and 122, the study that's
17 being discussed here is the 1993 Atkinson study,
18 which is a study that was conducted for
19 Cheminova, correct?
20 MS. FORGIE: Objection.
21 (Witness looks at document.)
22 A. I can't tell from what I have in front
23 of me.
24 Q. It's the Atkinson 1993 study, it's
25 indicated on the bottom of 123, correct?

1 A. On the bottom of 123?
2 (Witness looks at document.)
3 Q. The very bottom line -- oh, sorry,
4 122.
5 Sorry, wrong page.
6 A. 122?
7 Oh, it says Atkinson, et al., 1993.
8 Q. Okay. And the JMPR document, on the
9 first sentence of that second to last paragraph
10 on page 122 states, "There were no statistically
11 significant increase in the incidence of any
12 tumors, either benign or malignant, in either
13 sex when compared with control groups," correct?
14 A. That's what it states.
15 Q. And then the JMPR document provides
16 the same numbers for haemangiosarcomas in that
17 study that you then report in the IARC
18 monograph, correct?
19 MS. HANLON: Object to form.
20 A. That appears to be the case, yes.
21 Q. And then the JMPR document states in
22 connection both with the haemangiosarcomas and
23 with respect to finding some one other tissue,
24 in that last sentence of the second from the
25 bottom paragraph on page 122, a quote, "Owing to

the lack of a dose response relationship, the lack of statistical significance, and the fact that the" changes "recorded in this study fell within the historical ranges for controls, these changes were not considered to be caused by administration of glyphosate," correct?

A. That's what it says here, yes.

MS. HANLON: Objection, form.

I'm going to indicate that the -- you indicated -- you said instead of incidences, changes, mine said incidences.

So if we're taking it literally, reading it, the third sentence up where it says, "the fact that the incidence recorded in this study."

MR. LASKER: It says "incidences," that's what I said.

MS. HANLON: No, you didn't.

I will object on the basis of I heard "changes." It was not correctly read.

MR. LASKER: Let me restate the question.

Q. The JMPR document states with respect to the haemangiosarcoma findings in this 1993 mouse study, the same haemangiosarcoma findings

that IARC reports, "Owing to the lack of a dose-response relationship, the lack of statistical significance and the fact that the incidences recorded in this study fell within the historical range for controls, these changes are not considered to be caused by administration of glyphosate," correct?

A. That's what it states.

Q. And the JMPR document that IARC had in its review of this 1993 mouse study states, "In conclusion" -- the very last paragraph on the page -- "In conclusion, administration of glyphosate to CD-1 mice for 104 weeks produced no signs of carcinogenic potential at any dose," correct?

A. That's what it says.

Q. And the JMPR in conducting its review of this study had the actual study documents to look at, correct?

MS. FORGIE: Objection.

MS. HANLON: Objection, form.

A. I have no idea.

Q. All that you have for your review in IARC was what the JMPR set forth in this one page, a little bit over one page in its review,

correct?

MS. FORGIE: Objection.

A. That's what we had.

Q. The IARC monograph in discussing this same study states that "the findings of haemangiosarcoma" --

MS. FORGIE: What page are you on, please?

Q. Page 33 of the working group document of the monograph.

The middle of that last paragraph on page 33 says that there was a statistically significant increase in the incidence of haemangiosarcoma in males with a P value of less than 0.001.

Do you see that?

A. I see that.

MS. HANLON: Objection, form.

Q. Did you prepare that statistical analysis?

A. It was prepared in our subgroup.

Q. Did you have any discussion of the fact that the statistical analysis conducted for IARC reported statistically significant to the .0001 (sic) P level, where the JMPR concluded

that there was no statistically significant increase in haemangiosarcomas in the male mice in the study?

MS. FORGIE: Objection.

A. I don't recall that particular -- discussion to those particular points, no.

Q. Do you recall who it was in your subgroup that conducted that statistical analysis?

MS. FORGIE: Objection, asked and answered.

A. I don't remember who did it, no.

It was probably IARC staff that did it, but I don't remember who did it.

Q. And you don't recall, I take it, during the working group meeting going back and looking at the 2006 JMPR document and seeing that they were reporting that this data was not statistically significant; is that correct?

MS. FORGIE: Objection.

MS. HANLON: Objection, form.

A. I don't re -- I don't recall that specific discussion.

It could very well have come up in the discussion.

But with this and so many others, when we looked at the published -- when we look at a study and we look at the data from the study we do -- the working group is asked to do its own evaluation of the data and not -- and not to just take the conclusions of the office.

So that's what is done in all of the working groups.

Q. But just to be clear, the only data you had for this study was the data that was provided by the -- that's in this one page of the JMPR document; is that right?

MS. FORGIE: Objection, mischaracterizes his testimony.

A. That appears to be the case.

Q. And do you have any information with respect to renal tumor -- renal tumors in the 1993 Cheminova mouse study?

A. I'm sorry, say that again.

Q. For the 1993 mouse study, I'm sorry, the one that we're talking about with respect to the JMPR --

A. Okay.

Q. -- do you have any information with respect to the incidence of renal tumors in that

study?

A. Only if it was in the report.

Q. And sitting here today do you have any understanding of the number of and distribution of renal tumors in the 1993 mouse study that is discussed in the IARC monograph?

MS. HANLON: Objection, form.

MS. FORGIE: Objection.

That goes into privileged information because you're asking him as of today and we've discussed these matters.

And I object and instruct him not to answer to the extent that information you have comes from discussions that you have had with us as your expert -- as our expert.

MS. HANLON: And I join in that instruction -- I join in that objection and I instruct him, too, in regards to the objection as a -- in regards to the relationship with the attorney.

MR. LASKER: Well, I'll restate the question.

Q. Based upon your own continuing analysis of the data in the studies, are you aware sitting today of what the incidence is of

renal tumors in the mice in the 1993 mouse study that is discussed in the IARC monograph?

MS. FORGIE: Objection.

MS. HANLON: Objection.

MS. FORGIE: Do not answer that with regards to anything that you and I or any of the other attorneys have discussed.

Don't give any -- in other words, no information that we have provided to you or discussed with you can be discussed at this point.

If you have that answer without going into discussions you had with us as our expert, then you may do so.

Q. Okay. So again I'll state the question because I think my question addressed that.

Based upon your own independent assessment of the scientific studies, sitting here today do you have any understanding of the incidence and distribution of renal tumors in the 1993 mouse study that is discussed in the IARC monograph?

MS. HANLON: Objection, form.

MS. FORGIE: Objection, also it goes

beyond the scope.

It's supposed to be about what he did at IARC, not what he does today.

A. I cannot give you an opinion on that right at the present time.

Q. I'm not asking for your opinion.

I'm just asking if you're aware of the data.

Are you aware of what the 1993 Cheminova mouse study found with respect to renal tumors?

MS. FORGIE: Objection.

MS. HANLON: Objection, form.

And I would instruct him not to answer.

Because at this point you've asked and answered and I feel like it's gone beyond it.

We're here for a fact deposition.

MR. LASKER: Okay. You've asked and answered, he has not answered.

I've asked, you've objected four times now.

If you're instructing the witness not to answer questions based on his factual

knowledge of the data in the 1993 mouse study, we can take that up with a judge.

There is no basis on any rule of evidence for you to instruct the witness not to answer that question.

It's a factual question.

MS. HANLON: I'm instructing him not to answer.

MR. LASKER: Okay. We'll mark that in the deposition as well.

Q. As part of the IARC monograph process, when you are presenting the data and your assessment of these animal studies and when you looked at the 1983 mouse study and reported data on renal tumors and then you reported data from the 1993 mouse study in the very next paragraph, did anyone suggest looking at the data from that 1993 mouse study to determine whether or not it had data on renal tumors that would either replicate or not replicate what was found in the 1983 mouse study?

A. As part of a review of any chemical, when you look at data -- when you look at studies you would look to see if the tumor sites reported in one study are also reported in

another study because that gives you -- if there are reports -- if the same tumor site is reported in more than one study, then that gives you some more information into the strength of the evidence for the finding.

Q. And in conducting that review for IARC in 2015, after reporting on the renal tumor findings in the 1983 mouse study, and then turning to the 1992 mouse study, did you look to see whether, in fact, the 1993 mouse study had data with respect to renal tumors?

MS. FORGIE: Objection.

A. We probably -- we probably would have asked the question, wonder if there was any tumor -- any kidney tumor data from that study, but there wasn't any indicated in the information that we had.

Q. Okay. And when you were provided access -- as you mentioned earlier -- to those original data tables that were appended to the Greim publication that you were aware that those existed, did you at any -- during the IARC working group meeting, did you at any time or did anyone suggest at any time looking at those data tables to see if it would provide an answer

to that question about whether or not there were renal tumors found in the 1993 mouse study?

MS. FORGIE: Objection, mischaracterizes his testimony.

A. No, we didn't have time to go through the reams and reams of numbers that were provided with the Greim.

Q. Now the 1990 -- I'm sorry, strike that.

Exhibit 12-18, also the draft of the IARC monograph also has a discussion of the 1997 -- sorry -- yes, the 1993 mouse study as discussed by the JMPR, and this is on page 858.

A. 858. Okay.

Q. The second page, the second -- bottom paragraph.

MS. FORGIE: I'm sorry, what page are you on?

MR. LASKER: 858.

MS. FORGIE: Thank you.

(Witness looks at document.)

Q. And in that paragraph in the draft document it is reported that the findings with respect to haemangiosarcoma were not significant, correct?

(Witness looks at document.)

MS. FORGIE: What line is it, please?

MR. LASKER: That would be the fifth and sixth line of the second paragraph -- or the bottom paragraph on that page.

A. Okay.

Q. And the final sentence of that page, of that paragraph also states that the tumor incidence for haemangiosarcoma and for also the other -- other findings in this study of tumors "fell within the historical ranges for controls," correct?

A. That's what it says here.

Q. And in the final monograph those two statements, the final IARC monograph of Working Group 112, those two statements have been taken out, correct?

MS. FORGIE: Objection.

A. They're not in the -- in this version of the monograph, correct.

Q. Do you know who took those statements out of the draft monograph before the monograph was finalized?

MS. HANLON: Objection.

A. I -- you really cannot say an individual was responsible for that because the monograph is a product of the whole working group.
Q. Okay. Let me ask you this, do you recall the decision to remove those statements from the draft --
MS. FORGIE: Objection.
Q. -- monograph?
A. No, I don't remember -- I don't recall those discussions.
Q. Do you know why those statements were removed from the draft monograph?
MS. FORGIE: Objection.
A. I don't know why.
Q. The IARC monograph also talks about rat studies and we'll turn to that.
And in particular there was a discussion both in the draft monograph and in the final monograph of rat studies that were reviewed by EPA.
And I can direct you to page 36 and page 40 of the final monograph.
(Witness looks at document.)
MR. LASKER: Why don't we actually go

off the record just so we can have the doctor do this efficiently.
I'm going to ask you, Doctor, to review the IARC monograph with respect to the rat studies reviewed by EPA.
They begin on pages 36 and 40.
And then also the draft of that monograph section on those same two studies, which appears at page 863.
So why don't we go off the record so you have a chance to do that.
THE VIDEOGRAPHER: We're going off the video record. The time is 3:11 p.m.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record. The time is 3:26 p.m.
BY MR. LASKER:
Q. Dr. Jameson, when we took our break we were talking about the IARC review of certain rat studies that were discussed in EPA memos, correct?
A. Uh-huh.
Q. And there were, as set forth in the final monograph, two rat studies for which you had information from EPA memorandum, correct?

A. Correct.
Q. And those studies were also, if you can look to the draft of that monograph at page 863, which is again Exhibit 12-18 -- starting with the second full paragraph on 863 there is again discussion of those same EPA memos and their discussion of two rat studies, correct?
A. That's what it says here.
Q. And in the draft monograph the animal subgroup noted with respect to the study on 60 male and 60 female rats there was a discussion there about pancreatic islet tumors, correct, or pancreatic islet cell adenomas?
MS. HANLON: Are you referring him to which exhibit?
MR. LASKER: This is Exhibit 12-18, and the document he is looking at on page 863 at about lines --
THE WITNESS: 19.
MS. HANLON: Okay.
Q. There is a discussion of pancreatic islet cell adenomas, correct?
A. Okay.
Q. And in the draft of this monograph

there is the statement at page -- at lines 22 through 24 with respect to the pancreatic islet cell adenomas, "There was no statistically significant positive dose-related trend in the occurrence of these tumors and no progression to carcinoma.
The EPA concluded that this lesion was not compound related, correct?
A. That's what the EPA said.
Q. And the EPA would have reached that assessment based upon its review of the full study report, correct?
MS. HANLON: Form.
MS. FORGIE: Objection, calls for speculation.
A. I'm sorry, say that again.
Q. The EPA would have reached that conclusion based upon its review of the full animal -- rat cancer bioassay study report, correct?
MS. HANLON: Objection.
MS. FORGIE: Objection.
A. I -- I don't know.
I mean that's what we got out of the EPA report.

Q. You were --
A. This -- EPA indicated that they or concluded that the lesion was not compound related.
Q. And you worked at the NTP for how long, 25, 30 years did you say?
A. Thirty years.
Q. Based upon your work at the NTP, do you have any understanding of how the EPA -- when the EPA reviews substances for carcinogenicity whether they actually review the study documents?
MS. FORGIE: Objection, calls for speculation.
A. I don't know.
I have no experience with what EPA does.
Q. So in your analysis of the animal data when you were relying upon these EPA review documents for purposes of IARC, is it your testimony that you did not have an understanding of what information EPA had at its disposal in preparing those review documents?
MS. FORGIE: Objection.
MS. HANLON: Objection to form.

A. I mean obviously we had the documents because we reference them.
I don't understand what you're driving at.
Q. My question is, did you have any understanding when you relied upon those EPA memorandum of what information EPA had when it conducted its review of those studies?
MS. FORGIE: Objection.
A. They had the studies that were submitted to them for the registration of glyphosate.
Q. Okay. So for the purpose of this study now, the 1990 -- the rat study that's being discussed on page 863 where EPA reached its conclusion that there was no statistically significant positive dose related trend, no progression to carcinomas, and where EPA concluded that the lesion was not compound related, the EPA reached that conclusion based upon a review of the actual rat study, correct?
MS. FORGIE: Objection, asked and answered.
MS. HANLON: Form.
A. That was their conclusion --

MS. FORGIE: Calls for speculation.
Wait.
Let me get my objection in.
Objection, calls for speculation and asked and answered.
Thank you.
A. That was their conclusion.
Q. And that was their conclusion based upon a review of the actual rat study, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
MS. FORGIE: Calls for speculation, asked and answered.
A. I've already answered that.
Q. And the answer --
A. It was that -- that was their conclusion.
Q. Based upon a review of the actual study, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
MS. FORGIE: Asked and answered three or four times.
You're now starting to harass him just because you don't like the answer.

A. Based on their review of the study that was submitted for the registration of glyphosate, that was their conclusion.
Q. Thank you.
Now, and I think you already stated the only documents you had, the only information that you had for your review for IARC is what EPA stated in its review memorandum, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
A. Correct.
Q. You did not have the underlying study, correct?
A. I did not.
Q. Okay. And if you can look at the final monograph when it's discussing this same rat study that is discussed in the draft, the statement that appears in the draft monograph that you prepared, which notes that there was no statistically significant positive dose related trend and no progression to carcinoma, that has been deleted from the final monograph, correct?
MS. FORGIE: Objection.
A. Umm...
(Witness looks at document.)

A. This is EPA...
(Witness looks at document.)
Q. Page 36, if that's helpful, the second column.
A. Uh-huh.
(Witness looks at document.)
A. I can't -- I don't see that it's in there or not, but I don't think it is.
(Witness looks at document.)
A. Well, let's see, line by line...
MR. LASKER: Okay. Let's go off the record.
THE VIDEOGRAPHER: We're going off the video record. The time is 3:34 p.m.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record. The time is 3:37 p.m.
BY MR. LASKER:
Q. So Dr. Jameson, as we were discussing, in the draft monograph that your subgroup prepared with respect to this rat study reviewed by EPA in 1991, the draft monograph notes that there was no statistically significant positive dose related trend in the occurrence of pancreatic islet cell adenomas and no

progression to carcinoma, and the draft monograph also notes that the EPA concluded that this lesion was not compound related.
And those statements were deleted from the monograph and do not appear in the final Working Group 112 monograph for glyphosate, correct?
MS. FORGIE: Objection.
A. No.
Q. Do those statements appear in the final monograph?
A. One of the statements is still in the monograph, but reworded.
Q. Okay. Which statement is still in the monograph and which one has been deleted?
A. If you look on page 36, the second column towards the bottom in the bracketed statement, okay, "the working group noted that there were no statistically significant positive trend in the incidence of these tumors and no apparent progression to carcinoma."
Q. I stand corrected.
So the only thing that then was deleted from the draft monograph and does not appear in the final monograph was the statement

that the EPA concluded that these pancreatic islet cell adenomas in this rat study were not compound related, correct?
MS. FORGIE: Objection.
A. That is correct.
That is correct, but I would --
MS. FORGIE: Wait.
Let him finish.
Go ahead.
A. I would just like to point out that what you have here is a draft document.
It's a draft working document that the working group was working from for the review of glyphosate.
It is a work in progress and so that's why there are changes between this document that you see here and the final document that is published as the IARC monograph.
So it's apples and oranges.
Q. I understand that.
And part of what I'm trying to find out is what changes were made in the drafting process and why.
And do you recall when it was that the statement that appeared in the draft monograph

noting EPA's conclusion that these pancreatic islet cell adenomas in the rat study were not compound related, do you remember when that statement was deleted from the monograph?
A. I do not.
Q. Do you remember who made the decision to delete that statement from the monograph?
A. I don't know for sure who did -- I do not know who did it.
Q. Do you know why that statement was deleted from the monograph?
MS. FORGIE: Objection.
A. I do not know for a fact.
I could only speculate and I do not want to speculate.
Q. Okay. Let's look then at the draft monograph discussion of the second rat study that was reviewed by EPA.
And this is on the bottom of page 863, Bates number ending 863 and carrying over to 864.
And this is also discussing another rat study.
And there's a discussion of pancreatic islet cell adenomas in that study as well.

Do you see that?
A. Yes.
Q. And in the draft monograph on page 864 with respect to the second rat study it states on line 5 to line 7, "there was no statistically significant positive dose related trend in the occurrence of these tumors and no progression to carcinoma," correct?
A. Correct.
Q. And there was a statement that "the EPA concluded that this lesion was not compound related," correct?
A. Correct.
MR. LASKER: And I expect we're going to want to take a break here, but I'm going to ask you with respect to those statements to take a look at the final monograph and to see which of those statements remained and which of the statements, if any, did not remain in the final monograph.
So let's take a break so that the doctor can review it.
THE VIDEOGRAPHER: We're going off the video record. The time is 3:41 p.m.
(Discussion off the record.)

THE VIDEOGRAPHER: We're back on the video record. The time is 3:43 p.m.
BY MR. LASKER:
Q. So Dr. Jameson, the -- again, the draft monograph has a discussion of the second rat study about the fact -- with respect to pancreatic islet cell adenomas, that there was no statistically significant positive dose related trend in the occurrence of these tumors and no progression to carcinoma.
First of all I'll take that, and that sentence does appear in the final monograph, correct?
A. It does appear?
Q. Yes.
A. Yes, it's in the bracketed comments there.
Q. And then there's a second statement in the draft monograph with respect to the second draft study, that the EPA concluded that this lesion, the pancreatic islet cell adenomas in the second rat study was not compound related.
And that statement does not appear in the final monograph, correct?
A. Correct.

MS. FORGIE: Objection.
Q. And do you, first of all, know who made the decision to remove that statement from the draft monograph?
A. No.
Q. Do you know when that statement was removed from the draft monograph?
A. I don't know when, no.
Q. Do you know why that statement was removed from the draft monograph?
A. In asking these series of questions I've been pondering over in my mind why would that statement be taken out?
And all of a sudden I remembered the reason why that statement would be taken out.
Q. Okay. Now let me just -- before you get to that I want to clarify --
MS. FORGIE: Wait.
He gets to finish his answer.
MR. LASKER: No.
Because he just said he doesn't remember who or when, so I want to make sure I understand what his answer is going to be.
MS. FORGIE: Wait. He gets to finish his answer before you do that.

Q. Do you recall why the statement was removed or do you recall a reason why it may have been removed?
A. I remember why it may have been removed.
Q. Okay. Well, we can -- your counsel may ask you that question.
My question for you, though, is not why it may have been removed, but why, in fact, it was removed.
So again, do you know why, in fact, the statement that appears in the draft monograph, the EPA concluded that this lesion was not compound related with respect to the second rat study and pancreatic islet cell adenomas, do you know for a fact why that statement was removed from the draft monograph?
MS. FORGIE: Objection.
MS. HANLON: I'll instruct him not to answer if he feels that it's going to cross over into expert testimony.
A. I'll answer, okay, because like I said, it just came to me.
This is an IARC publication and the opin -- the evaluation and the findings are from

1 an IARC working group.
2 And so other opinions or other reviews
3 that may have been done with this data is --
4 it's not appropriate to have that in the
5 document.
6 So that's why I think they were taken
7 out.
8 Q. In your assessment as part of IARC for
9 determining or trying to understand the data
10 that appears in studies that you've not had an
11 opportunity to review, is one of the factors
12 that you consider, well, what those scientists
13 who did have an opportunity to review the
14 ongoing study concluded with respect to study?
15 MS. FORGIE: Objection.
16 MS. HANLON: Object to the form.
17 A. I think as I indicated before, the
18 charge to the working group is to -- is to take
19 the data that is available in the available
20 documents, the published literature, the
21 government reports, whatever data that is
22 available to the working group, and for the
23 working group to look at the data, assess the
24 data, and make a determination of what the data
25 means.

1 So that it -- when it's reported in
2 the IARC monograph it is the opinion of the IARC
3 monograph working group that something is known
4 to be a human carcinogen, probably a human,
5 possibly a human, it's an IARC determination.
6 Q. But specifically with respect to
7 glyphosate and with respect to the animal data
8 and the IARC working group's conclusion with
9 respect to the animal studies for glyphosate,
10 those conclusions were based solely upon data
11 that was provided in a summary fashion in
12 memorandum by either the EPA or the JMPR in
13 those documents we've reviewed, correct?
14 MS. FORGIE: Objection.
15 A. The data was taken from those
16 documents, correct.
17 Q. And the original reviews were prepared
18 by scientists either at EPA or at the JMPR who
19 actually looked at the underlying study
20 documents, correct?
21 MS. FORGIE: Objection --
22 MS. HANLON: Form.
23 MS. FORGIE: -- calls for speculation.
24 A. That is the assumption, yes.
25 Q. And if we could turn to page 76 of the

1 IARC monograph.
2 A. Oh, the summary.
3 Q. And there is discussions of the
4 findings for animal carcinogenicity data.
5 And if you need to take a break for
6 you to review this, we can.
7 But my question is going to be, there
8 are some studies that are discussed that didn't
9 have findings of tumors or had inadequate
10 information.
11 And then there are some studies that
12 you mentioned had information that you believe
13 supported your ultimate conclusion.
14 My question to you is whether I am
15 correct that the studies that IARC relied upon
16 in reaching its conclusion with respect to the
17 animal data are the same studies that we've
18 talked about that you learned about from EPA or
19 JMPR review?
20 MS. FORGIE: Objection.
21 Q. Okay. And they would actually be the
22 four studies we talked about, the two mouse
23 studies and the two rat studies --
24 MS. FORGIE: Objection.
25 MR. LASKER: And if you want to take a

1 break to be able to look through this to be
2 able to be sure you know the answer to that,
3 we can take a break and you can look through
4 this and I'll ask that question.
5 Does that make sense?
6 THE WITNESS: Okay.
7 MS. FORGIE: Okay. Off the record.
8 THE VIDEOGRAPHER: We're going off the
9 video record. The time is 3:50 p.m.
10 (Recess taken.)
11 THE VIDEOGRAPHER: We're back on the
12 video record. The time is 4:05 p.m.
13 BY MR. LASKER:
14 Q. So Dr. Jameson, I'd like to actually
15 just take a step back and go back to the
16 discussion of those two rat studies, because
17 there's something I missed with respect to both
18 of the rat studies as reviewed by the EPA.
19 There was a second -- another sentence
20 I wanted to direct you to on page 863.
21 With respect to the first rat study
22 there is the statement on lines 24 and 25 of the
23 draft monograph that "tumors were observed in
24 both males and females at low incidence in other
25 tissue sites, including thyroid, but were also

not considered to be related to the exposure to glyphosate."

Do you see that?

A. Yes.

Q. And likewise with respect to the second rat study that was reviewed by EPA in its 1991 document on page 864.

Again there is a statement on lines 7 through 9, "Tumors were observed in both male and females at low incidence in other tissue sites including thyroid but were also not considered to be related to the exposure to glyphosate."

Do you see that?

A. Yes.

Q. And so these were statements that appeared in the draft monograph that you prepared at some point during that working group meeting, correct?

A. Correct.

Q. And those statements at least as stated did not appear in the final monograph, correct?

MS. FORGIE: Objection.

A. That's correct.

Q. And do you recall when those statements were removed from the monograph?

A. I do not.

MS. FORGIE: Objection.

Q. Do you remember or do you recall who would have removed those statements from the monograph?

MS. FORGIE: Objection.

A. No.

Q. Do you know why those statements were removed from the monograph?

MS. FORGIE: Objection.

A. No.

Q. Okay. Returning to page 76 of the monograph, there is the discussion of the animal carcinogenicity data that IARC ultimately relied upon in reaching the conclusion that there was sufficient evidence of carcinogenicity in the animal studies, correct?

A. Correct.

Q. And the -- as set forth in the final monograph, the determination with respect to the carcinogenicity data in support of that IARC finding of sufficient evidence in animal studies was based upon the two rat studies that we've

been discussing that were discussed in an EPA review document and the two mouse studies that we've discussed in this deposition, one reviewed by EPA and the other by JMPR, correct?

MS. HANLON: Object to the form.

MS. FORGIE: Objection.

A. That's accurate, yes.

Q. And with respect to all four of these studies the findings that IARC cited to as evidence in support of a sufficient evidence of carcinogenicity in animals, in all of those studies the EPA or the JMPR had concluded that those findings were not related to glyphosate, correct?

MS. FORGIE: Objection.

MS. HANLON: Objection, form.

A. That's what their document indicated.

Q. Dr. Jameson, there are -- there were four individuals on the IARC 112 working group who were also fellows of an organization called Collegium Ramazzini.

A. Okay.

Q. Are you familiar with Collegium Ramazzini?

A. I have heard about it.

I know very little about it.

Q. Have you had discussions with any of the scientists that you've worked with for IARC, on IARC working groups about the Collegium Ramazzini?

A. No.

Q. Has anyone ever discussed with you the possibility of your joining the Collegium Ramazzini?

A. No.

Q. Have you ever attended Ramazzini Days in Italy?

A. No.

MS. FORGIE: Objection, relevancy.

Q. Do you know what those are?

A. I've heard of some colleagues when I worked at the NTP that went to these, but just that they went to Italy.

That's all I knew.

Q. Okay. And have you -- to your knowledge have you had conversations with members of the Collegium Ramazzini regarding glyphosate?

A. No.

MS. FORGIE: Objection.

MR. LASKER: Let's take a short break.
I may be almost finished up.
MS. FORGIE: No way.
THE VIDEOGRAPHER: We're going off the video record. The time is 4:11 p.m.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record. The time is 4:42 p.m.
BY MR. LASKER:
Q. Dr. Jameson, the IARC Working Group 112 completed it's week long session in March of 2015, correct?
A. Yes.
Q. And the final monograph came out -- I can't remember, sometime like in July of 2015, something along those lines?
A. I think it was available online at that time, yes.
Q. So am I correct in my understanding that subsequent to the completion of that week long working group meeting, there is further work that's done on the monograph to bring it to its final form in which it's published; is that correct?
A. That's correct.

Q. Were you involved in any of the process subsequent to the end of that working group meeting, up to the time of the publication of the final monograph in any revisions or edits that were made to the monograph?
A. I don't really remember.
In general I know in the past from time to time they do come back to the -- usually the subgroup chair for points of clarification if they're not -- if they need to clean up a reference or get the wording right.
But for glyphosate, to be honest, I do not recall if I was contacted about that or not.
I don't remember.
Q. And did you for a period of time retain the final draft monograph document that you had at the end of that meeting so that if questions were raised in that subsequent period of time by IARC staff about language changes you would have the final monograph as the working group had seen it to compare it to?
MS. FORGIE: Objection.
A. I may have.
I don't remember.
Q. Okay. Do you know who at IARC for

Working Group 112 would have taken whatever was the final draft that you saw in the working group during that week long meeting in March of 2015 and revised it to the final draft that was published in July 2015?
MS. FORGIE: Objection.
A. That would have been the responsibility of the editor who was present at the meeting.
There was always an individual who serves as the editor who just keeps track of all the different sections and the different parts.
And she ultimately was the person responsible for getting the final draft completed.
Q. And who was that for Working Group 112?
A. I'd have to look at the list of attendees, but I think it was Heidi -- I think her name was Heidi -- I'm sorry, I don't remember her last name.
Q. Would there be other members of the IARC staff who would have assisted her --
A. Oh, yes.
It's --

MS. FORGIE: Wait.
We have to wait for the question to come out, please.
I know it's the end of the day, but...
Q. Would there have been other members of the IARC staff who would have assisted the editor in any revisions to the monograph from the version that existed at the end of the working group meeting to the final published version?
MS. FORGIE: Objection, calls for speculation.
A. Okay. The editor would rely on the various subgroup rapporteurs to provide the information she would need to make the final draft of the entire document.
Q. And so the subgroup rapporteurs, those are the members of the IARC staff?
A. Those are IARC staff members.
Q. Okay. And who was the subgroup rapporteur for the animal --
MS. FORGIE: Objection.
Q. -- subgroup for Working Group 112?
A. That would have been Yann Grosse.
Q. Okay. And I actually do have a list,

or I don't, my -- John did of the members of the staff who worked on IARC 112 -- but I can show it to you if you want.

But is it Heidi Mattock?

A. There you go.

Q. So she was the editor for Working Group 112?

A. Yes.

Q. And so she would have worked with respect to your section --

MR. LASKER: Well, actually, why don't we mark this.

(Exhibit 12-24, Multipage document entitled Some Organophosphate Insecticides and Herbicides, Volume 112, marked for identification, as of this date.)

Q. And this is a -- the first pages of the Volume 112 monograph.

And page 7 or the last page of this document is a list of the participants from IARC who are involved in that process, correct?

A. Correct.

Q. Okay. So of the individuals who are listed on page 7 of this document, other than Heidi Mattock and Yann Grosse --

Grosse or Grosse?

A. Grosse.

Q. Grosse.

Sorry.

-- would any of the other individuals on the IARC staff have been involved in revisions or edits to the monograph after the end of the working group meeting leading up to the publication of the final monograph?

MS. FORGIE: Objection, asked and answered.

A. The individuals who are identified here as a rapporteur for the respective subgroups would have been the individuals who would have assisted Heidi in getting all the information together for the final draft.

Q. Okay. Would anybody else among the IARC staff that's not listed as a rapporteur have been involved in edits to that monograph from the time of the end of the working group session until it appears in the final monograph?

MS. FORGIE: Objection, asked and answered, calls for speculation.

A. I don't know of anybody else.

Q. Okay. And we had discussed during the

course of your testimony here today various changes in the monograph from the draft monograph until the final monograph.

Could those changes that we discussed have been made by the IARC staff after the working group meeting concluded?

A. No.

MS. FORGIE: Objection.

Q. So is your testimony then --

Okay. I'm sorry.

A. May I clarify?

Q. Yes.

A. Grammatical corrections and grammar and verification of references may have been made by other than the actual working group members who submitted the final document.

But as I indicated before, the monograph is considered a product of the working group.

And so the working group is responsible for everything that's in the document.

Q. Okay. So just so I understand, the edits or the changes that we had talked about between the draft and the final monograph that

we walked through, those changes you do not believe would have been changes that would have been appropriate for IARC staff to have made; is that correct?

MS. FORGIE: Objection.

A. Yes, that is my opinion.

Q. Okay. But you do not, as you've already talked about here today, know who made those changes, correct?

MS. FORGIE: Objection, asked and answered, calls for speculation.

A. I do not.

MR. LASKER: Okay. I have no further questions.

MS. FORGIE: Okay. Do you need to --

MR. LASKER: We can go off the record and switch it around and...

THE VIDEOGRAPHER: We're going off the video record. The time is 4:50.

(Recess taken.)

THE VIDEOGRAPHER: We're back on the video record. The time is 5:02 p.m.

EXAMINATION BY

MS. FORGIE:

Q. Okay. Dr. Jameson, you were asked a

few questions about your work --
MR. LASKER: I'm sorry. I have to reserve my time.
So I have finished my questioning. I think I have 36 minutes left.
MR. KALAS: 38.
MR. LASKER: 38 minutes left I will reserve for cross-examination -- for redirect, I'm sorry.
MS. FORGIE: Okay.
Q. Doctor, you were asked a few questions about your work at IARC and I just have a few follow-up questions on that.
Do you consider your work at IARC to be in some way a continuation of the work you performed at NTP?
A. Yeah, in a manner of speaking, yes, it is.
You know, I've always -- my whole career has been environmental carcinogenesis.
And it's a way for me to keep in touch, to keep up to date on what's going on and to interact with former and new colleagues that I've developed over the many years I've worked.
Q. And is your work concerned with the

causes of cancer?
A. The work that I do or have done for my career is to look at the environmental causes of cancer.
If materials that people are exposed to in their environment, be it, you know, from outdoor air exposure to the materials that they wear, the food that they eat, whatever, if there are agents within those materials that could possibly lead to cancer.
Q. And why is it -- why are the causes of cancer important to you?
MR. LASKER: Objection to scope to the extent that this is not expert testimony.
The same objection I was getting on the other side, but you can answer.
A. Say that again, please.
MS. FORGIE: You can read the question back, please.
(Record read.)
A. The causes are important, I think, because it's important to get the information and the knowledge out to the general public.
In my mind knowledge is strength.
And if you determine that there is a

material out there that people are potentially exposed to that is harmful to them that may cause cancer, if you can provide those individuals with that information then they can make an informed decision if they want to be exposed to it or not.
They can make the decision that, oh, I need to use this material in my life.
I can't avoid it.
But knowing that it causes harm to me, I can take additional steps to protect myself from it.
I can wear protective clothing; I can make sure I, you know, don't overuse it; I respect it more.
So my philosophy has been find out the causes of cancer.
Let people know that information so that they can make an informed decision how that may affect their life.
Q. And is that one of the reasons you volunteered to work on the IARC working group committee with regard to glyphosate?
A. Yes.
I've been interested in -- in my past

work experience I've investigated a number of pesticides and it sparked an interest in me in all of the pesticides to see if something that has been developed as a poison to something may not also be a poison to humans and how it might affect them as it relates to cancer.
Q. Okay. And you mentioned that early, first thing in the day almost, that you had reviewed the IARC preamble in preparation for your deposition today.
Do you recall that testimony?
A. Yes.
Q. And why did you review the IARC preamble in preparation for your deposition today?
MR. LASKER: Objection to form.
A. Well, it -- this was a deposition for fact of what worked in the animal work -- experimental animal subgroup for the IARC monograph.
And so I just wanted to make sure I was up to date on what the preamble said and could hopefully clearly express it if the question came up.
Q. So the question came up?

A. The question came up.
Q. What is the purpose of the IARC preamble, your understanding of the purpose?
A. The preamble basically outlines what the IARC monograph is, what its purpose is, how it is developed, the procedure that the IARC monograph or that the International Agency for Research on Cancer follows in the preparation of the monograph.
And it describes the criteria, most importantly I guess, it has a criteria by which the data for the substance under review are evaluated for cancer in the monograph.
Q. So the preamble to the IARC monograph tells you -- gives you the guidelines to follow in determining whether or not a substance is carcinogenic?
MR. LASKER: Objection to form.
A. It gives you the guidelines -- yeah, it gives you the guidelines for the -- for how the IARC wants the working group to review the data, and prepare the report, and evaluate the data, judging -- using the criteria that's in the preamble.
Q. And is it important to have guidelines

that set out how the working group is to proceed and make their determination with regard to carcinogenicity?
A. Well, it's very important because the guidelines not only act as an outline to the individual members of the working group as to how they're expected to review the data and what criteria they need to use in order to make their final evaluation, but it also describes to the individuals who read the monograph how the monograph -- what the monograph is and how it's prepared and the importance of it in the international community.
Q. And with regard to your work on the 1112 (sic) Working Group with regard to glyphosate, did you follow the guidelines that were set out in the IARC preamble?
A. Yes.
Q. And do you follow other guidelines with regard to IARC working group in making your determinations with regard to carcinogenicity?
MR. LASKER: Objection to form.
A. Do we use other guidelines?
Q. Yes.
A. Well, from the standpoint of -- well,

if you look -- if you look at the preamble it specifically refers to the Bradford Hill criteria for the evaluation of epidemiology data.
So the epidemiology group obviously is directed to -- in their evaluations or discussions of the data in the epidemiology program, to make sure they apply the Bradford Hill criteria for adequacy of the study and ultimately deciding the level of evidence for that particular study.
Q. And --
A. But that's just one example.
The -- to be honest, that's about the only other one, other than the actual guidelines that IARC has outlined themselves for how the review process is to be done.
That's the only one that comes to mind right now.
Q. Okay. And very briefly, what is the Bradford Hill criteria?
MR. LASKER: Objection to form, beyond the scope.
MS. FORGIE: You can answer.
A. Bradford Hill is -- refers to a

publication where the --
How to explain it?
The -- it's a -- it's like the Bible for epidemiology as far as describing how -- what criteria the data from an epidemiology study must meet or should meet in order to say that the effects observed in an epidemiology study are causative of the agent that people were exposed to and not the result of a random chance.
Q. Okay. And did the IARC 1112 Working Group follow the Bradford Hill criteria in making their assessments with regard to carcinogenicity of glyphosate?
MR. LASKER: Objection to form, beyond the scope.
The witness has testified this deals with the epidemiology group, which he was not on.
MS. FORGIE: You can answer.
A. I did not attend the epidemiology subgroup discussions so I can't say specifically that they did address or did apply the Bradford Hill criteria.
They are directed to do so by IARC at

the beginning of the meeting.
Q. Okay. It's my understanding -- or let me ask it in a different way.
Was there a member, an employee of the EPA as part of the working group for glyphosate 1112?
A. Yes.
Q. Okay. And was that member, was that EPA employee in the animal subgroup?
A. No.
Q. Was the decision with regard to classification of glyphosate as to a --
Well, let me start -- let me go back for a second.
Can you explain what 2A is, the classification of 2A?
A. In IARC the classification of 2A means the material is determined to be a probable human carcinogen.
And a probable human carcinogen is one for which there is limited evidence in humans and sufficient evidence for the carcinogenicity in experimental animals, or it could be -- there are other caveats.
A 2A could be sufficient -- limited

evidence in humans, insufficient in animals.
But you have mechanistic studies that indicate that a mechanism for the formation of cancer operates in humans and that evidence is strong enough to add credence to the epidemiology study so that it would still be considered a 2A carcinogen.
On the other hand, you could have inadequate evidence in humans and sufficient evidence in animals, and again, have supporting mechanistic data from gene tox studies or other mechanism studies that indicate that mechanism for the formation of cancer in humans is credible based on the understanding of the mechanistic data.
So that in addition to sufficient evidence in animals could also lead to a 2A.
Q. Okay. And did the 112 -- did the IARC 112 Working Group make a determination that glyphosate fit into category 2A?
A. The entire working group -- yes, they -- the decision from the working group was that there was limited evidence in humans, sufficient evidence in animals, and supportive evidence from the mechanistic data, and that led

to a listing of a category 2A.
Q. Okay. And was the decision to place glyphosate into a category 2A a unanimous decision?
A. Yes.
Q. And so the EPA employee who was a member of the 112 Working Group was in agreement that the glyphosate is probably carcinogenic to humans; is that correct?
MR. LASKER: Objection.
Objection to form, calls for speculation.
MS. FORGIE: You can answer.
A. I did not visibly see his yes vote, but the fact that it was unanimous implies that he did vote yes in favor of group 2A.
Q. Okay. And likewise the EPA working group member agreed that a positive association had been observed between glyphosate and NHL; is that correct?
MR. LASKER: Objection to form, calls for speculation.
MS. FORGIE: You can answer.
A. All I can -- all I can say is that the EPA representative there voted in favor of a 2A.

The 2A was based on limited evidence in humans based on epidemiology studies that showed that exposure to glyphosate and glyphosate formulations is associated with an increased -- with the formation of non-Hodgkin's lymphoma in workers.
And so by implication, and if he voted in favor of the 2A, he was voting in favor of the epidemiology showing that glyphosate and glyphosate formulations caused non-Hodgkin's lymphoma.
MR. LASKER: Objection, move to strike, lack of foundation.
Q. You were shown -- you were shown a number of EPA documents earlier, specifically 19 -- Exhibits 19, 20, 21, and 22.
Do you remember being shown those EPA documents?
A. Yes, I do.
Q. And was the IARC working group committee aware at the time they were viewing -- were reviewing these EPA documents that the EPA had classified glyphosate as a category C, possibly carcinogenic agent?
MR. LASKER: Objection to form,

1 misstates the record.
2 A. The -- we were aware of the fact that
3 EPA at one time had classified it as a category
4 C, yes.
5 Q. And what is your understanding of
6 category C?
7 A. Carcinogenic, it is a carcinogen.
8 Q. Possibly?
9 A. Possibly carcinogen.
10 Q. Okay. And IARC was aware of that at
11 the time they were reviewing the glyphosate
12 issues, correct?
13 MR. LASKER: Objection to form.
14 A. Yes.
15 The documents that we had indicated
16 that it was classified as a Class C.
17 Q. You were also asked several questions
18 about EPA conclusions and what EPA had reviewed.
19 Do you remember those questions?
20 A. Yes.
21 Q. Were you aware at the time that you
22 were on the chair of the IARC animal subgroup
23 that -- or what exactly EPA had reviewed when
24 they made those statements?
25 A. All I could say is what the documents

1 we had obtained from the EPA -- the information
2 they contained, which indicated that they were
3 looking at studies that had been submitted to
4 them for the registration of glyphosate.
5 Q. But do you have any way of knowing
6 whether EPA reviewed raw data, what tables they
7 reviewed, do you have any information about
8 that?
9 A. No.
10 MR. LASKER: Objection, form.
11 A. I wasn't at the meeting.
12 I didn't see what they reviewed.
13 I have no way of knowing.
14 Q. Okay. And did anyone from EPA appear
15 at the meeting to tell you what EPA had
16 reviewed?
17 A. No.
18 Q. I'd like you to turn to Exhibit 15,
19 which is the IARC monograph, please.
20 A. Okay.
21 Q. And I'd like you to turn --
22 MS. FORGIE: Sorry. I'll wait till
23 you have it.
24 MR. LASKER: Yeah.
25 Okay. I've got it.

1 Q. I'd like you to turn to page 30,
2 please, which is the section that begins with
3 the "Cancer in Experimental Animals."
4 A. Okay.
5 Q. And do you see Section "3.1.1 Dietary
6 administration"?
7 A. Yeah.
8 Q. Okay. And you were asked several
9 questions -- well, first why don't you look to
10 the middle of that and you'll see a sentence
11 that states, "Survival in all dose groups were
12 similar to that of controls."
13 Do you see that section?
14 A. Yes.
15 Q. Okay. Do you recall being asked
16 several questions by counsel for Monsanto about
17 that section?
18 A. Yes, I do.
19 Q. Okay. And anywhere in there do you
20 state whether the survival in all dose groups
21 was statistically significant, whether there was
22 a change that was statistically significant?
23 A. No.
24 Q. And you weren't asked if there was a
25 statistical significance -- statistically

1 significant difference, were you?
2 A. No.
3 Q. Okay. And is statistical significance
4 a term of art?
5 A. By term of art you mean --
6 Q. In other words, does it mean something
7 specific?
8 A. Yes.
9 Q. And what does it mean?
10 MR. LASKER: I think I object to that.
11 Q. And what does statistical significance
12 mean?
13 A. Statistical significant means that the
14 difference seen is not due to chance.
15 Basically it just means it's not due
16 to chance.
17 Q. Okay. And does the word similar have
18 the same meaning as statistical --
19 A. As statistical, no.
20 MR. LASKER: Objection to form.
21 Q. Okay. And when you say "survival in
22 all dose groups was similar to that of control,"
23 is that a much broader range of what can be the
24 differences between those two groups as opposed
25 to statistical significance, which has a very

specific meaning?
A. Yes.
MR. LASKER: Objection to form.
Q. And can you explain what you mean by that.
A. Similar, similar survivals?
Q. Yes, versus statistical.
A. Versus statistical?
Similar means that the number of animals surviving in the controls and in the treated group were not -- not statis -- they weren't statistically different.
I mean -- I'm sorry.
Q. It's been a long day.
A. The difference between treated and control animals is not that different.
It's -- relatively they're around the same amount of survival between the different dose groups.
Whereas if there's a statistical difference between survival that means that one dose group had a much higher level of deaths or -- than the groups you're comparing it to.
So usually what you see in a study is that if you're testing a compound at the maximum

tolerated dose or at a very high dose, you see a lot more deaths in the high dose animal than you do in control.
And it -- I'll stop there.
I don't want to -- I -- TMI.
Q. Okay. I'd like you to turn to Exhibit 20, please, which is one of the EPA documents.
MR. LASKER: 12-20, right?
MS. FORGIE: 12-20, I'm sorry.
(Witness looks at document.)
A. Okay.
Q. Okay. I'd like you to look at -- I guess it's the second page which starts -- which is where the memorandum starts.
Do you see that?
A. Uh-huh. Okay.
Q. And what was the date of that memorandum, please?
A. December 4th, 1985.
Q. And can you look at the introduction section.
A. Uh-huh.
Q. Do you see where it states that tumors that were found in the kidneys of male mice at

different dose levels?
A. Yes.
Q. And so this is the original pathologist's finding of kidney tumors, which was 001 and 3.
Do you see that?
A. Yes.
Q. And what are -- do you know what those numbers refer to?
A. Those are the number of tumors seen in the control, in the low, in the mid, and the high dose animals.
MR. LASKER: I'll just object to form to the prior question, misreading the document.
MS. FORGIE: Mystery document?
MR. LASKER: Misreading the document.
MS. FORGIE: Oh, misreading.
I thought you said mystery document.
Q. Okay. And with regard to the zero, does that refer to the control group?
MR. LASKER: Objection to form.
A. The first --
Q. The first zero.
A. -- zero in the parentheses refers to

the control animal.
And when I read it I didn't read the second set of parentheses in there, which was 1, the asterisk, that that was a review pathologist's findings of an adenoma in the controls.
Q. Okay. And what do the other numbers mean in that section?
A. The second zero is an incidence of tumors in the low dose animals.
1 is the incidence in the mid dose animals.
And 3 is the incidence in the high dose animals, three tumors.
Q. So would it be fair to say that there were zero controls in the -- excuse me, zero tumors in the control, zero in the low dose, one tumor in the midrange dose, and three tumors in the high range dose?
A. That was the original finding for this study, yes.
Q. Okay. And so this is the review by the original pathologist who reviewed the pathology in this study, correct?
A. Correct.

Q. And then I'd like you to turn to Exhibit 12-21, please.
And can you turn to page 8, please.
A. Okay.
Q. And do you see under "Table 1" a listing of "Renal Tubular-Cell Lesions"?
A. Yes.
Q. And can you explain what that table is telling us, please.
A. This is a table of renal tubular cell lesions seen in male mice.
It's giving the incidences for the control, the low dose, the mid dose, and the high dose.
Tubular cell adenoma is -- there's one in the control, zero in the low dose, zero in the medium, one in the high.
For tubular cell carcinoma zero control, zero dose, zero for low, one for medium, two for high.
And the combined incidence of tubular cell adenoma and carcinoma is one in the control, zero in the low dose, one in the medium dose, and three in the high dose.
Q. Okay. And then going back to

Exhibit 12-20, please.
A. Uh-huh.
Q. Can you look at the "Results" section on that at the first page that's not the cover page.
It looks like that.
It starts out with a memo dated December 4th, 1985.
A. Okay.
Q. And can you look at the bottom in the "Results" section.
A. Okay.
Q. And do you see where it starts out "There was no difference in diagnosis between my" --
A. -- "my and the other pathologists' diagnoses with respect to kidney tumors."
Q. And can you read that "Results" section into the --
MR. LASKER: And just to be clear, that's in mid, high dose groups.
Complete that sentence.
MS. FORGIE: I'm going to have him read it.
MR. LASKER: Okay.

Q. Can you read the "Results" section into the record, please, Doctor.
A. Sure.
"There's no difference in diagnoses between my and other pathologists' diagnoses with respect to kidney tumors in the mid- and the high dose groups."
Q. Let me stop you for one second.
So the mid dose is where one tumor was found and the high dose was where three were found; is that correct?
A. That's correct.
I guess the way I should read the sentence is, "There is no difference in diagnosis between my and other pathologists' diagnosis with respect to kidney tumors in mid- (referring to animal No. 3023) and high dose (referring to animals 4029, 4023, and 4041) groups."
Q. Okay. Please continue.
A. "With regard to the questionable male control kidney it is my opinion that the presence of a tumor cannot definitively be established."
Q. Okay. And is that reference to the

tumor that Dr. Kuschner originally -- claims to have found on page 8 of Exhibit 21?
MR. LASKER: Objection to form, misstates the document.
Table 8 is not Dr. Kuschner, it's the pathology working group.
MS. FORGIE: Okay.
That the pathologist found.
THE WITNESS: The pathology working group.
MR. LASKER: The pathology working group, the EPA pathology working group.
MS. FORGIE: You can answer.
A. So the question is, is that the one -- is that -- is this referring to the one -- the tumors identified in the control from the pathology working group results?
Q. Correct.
A. Okay. Yes.
Q. Okay. And then please continue reading.
A. Okay. "Cannot definitely be established."
My interpretation is similar to the conclusion of Bio/dynamics pathology staff and

1 Dr. McConnell that the lesion may be a
2 proliferative change having the potential to
3 lead to the development of a frank tumor.
4 But as the tissue can be seen under a
5 microscope as a small, well-demarcated focal
6 cell aggregate, morphologically different from
7 the healthy looking surrounding kidney tissue,
8 this morphological alteration does not represent
9 a pathophysiologically significant change."
10 Q. Okay. And can you explain in layman's
11 terms what that means, please.
12 MR. LASKER: Objection to form.
13 A. In layman's terms, basically it means
14 they didn't see the tumor in the control animals
15 that that pathologist said.
16 MR. LASKER: Objection to form, calls
17 for speculation.
18 Q. Meaning "they," are you referring to
19 the EPA?
20 A. I'm sorry --
21 MR. LASKER: Objection to form,
22 misstates the document.
23 A. -- what they're saying is the...
24 MR. LASKER: Which "they" are you
25 referring to here?

1 MS. FORGIE: I'm on 20.
2 MR. LASKER: I'm asking which "they"
3 you're referring to.
4 MS. FORGIE: I just asked him that
5 question.
6 MR. LASKER: Who "they"?
7 A. It is the EPA pathologists are
8 saying --
9 MR. LASKER: That I --
10 MS. FORGIE: You can continue.
11 A. -- that they did not see a tumor in
12 the control animals that was reported previously
13 by Dr. Kuschner, I guess it was, who diagnosed
14 that.
15 MR. LASKER: Objection to form,
16 misstates the document, misstates also the
17 pathology working group document.
18 Q. Okay. So with regard to Exhibit 20,
19 the EPA document -- the EPA, U.S. EPA archived
20 document that was produced today by Monsanto's
21 attorneys, the EPA is stating in this document
22 that they do not see a tumor in the control
23 group; is that correct?
24 MR. LASKER: Objection to form,
25 misstates the document.

1 That's not what the document is
2 saying.
3 MS. FORGIE: You can answer.
4 A. What I read from this document is that
5 the EPA pathologist did not see a tumor, an
6 adenoma in the control animals of this study.
7 Q. Okay. And then going to Exhibit 18,
8 please, or 12-18.
9 MR. LASKER: 12-18?
10 MS. FORGIE: I'm sorry, what?
11 MR. LASKER: 12-18?
12 MS. FORGIE: Yeah.
13 Isn't that this one, the draft?
14 MR. LASKER: Yeah.
15 I didn't know where you were.
16 THE WITNESS: Okay.
17 MS. FORGIE: Okay. I'll wait for
18 everybody to get it.
19 Okay.
20 John, you ready?
21 Q. Okay.
22 At the bottom on the first page --
23 A. Uh-huh.
24 Q. -- do you see the statement, the last
25 two sentences where it says, "The report from

1 the PWG also indicated they firmly believe and
2 unanimously concur with the original
3 pathologists that the incidence of renal
4 tubular-cell neoplasms in the study are not
5 compound-related"?
6 Do you see that?
7 A. Yes.
8 Q. And then it goes on to state, "The EPA
9 stated that they did not feel that this lesion
10 was compound related."
11 Do you see that?
12 A. Yes.
13 Q. Okay. And that was a sentence that
14 was not in the final monograph; is that correct?
15 A. Correct.
16 Q. And that's because the original
17 pathologist, or would you agree that the
18 original pathologist -- let me rephrase that.
19 That the EPA agreed with the original
20 pathologist that there was no tumors in the
21 control, zero tumors in the low dose, one in the
22 mid, and three in the high dose?
23 MR. LASKER: Objection to form,
24 misstates the record, misstates the
25 document.

MS. FORGIE: You can answer.
A. You're saying that's the reason why it was taken out of the IARC monograph?
Q. I'm asking.
A. No, that would not be the reason why it was taken out of the IARC monograph.
Q. Okay. In any event with regard to -- okay.
With regard to Exhibit 20 --
MS. FORGIE: You know what, why don't we change the tape now and I'll come back.
MR. LASKER: Okay.
THE VIDEOGRAPHER: This will be the end of video media disk No. 4. The time is 5:34 p.m. We're going off the video record.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record. This is video media disk No. 5. The time is 5:42 p.m.
THE WITNESS: Could I ask to go back to the last question?
MS. FORGIE: Sure.
THE WITNESS: Could you read the last question from Kathryn, please.
(Record read.)

A. Just a point of clarification, as -- I don't feel that was the reason or the main reason that it was taken out of the IARC monograph.
I think, as I indicated before, the IARC had indicated they didn't want any other interpretation indicated in the monograph except that of the working group.
So that's why the EPA determinations were removed from this particular draft, from the draft.
Q. Okay.
A. Yes.
Q. In other words, IARC does not rely upon EPA conclusions or the IARC working group does not rely upon the EPA conclusions, they perform their own analysis; is that correct?
A. That's correct.
MR. LASKER: Objection to form.
Q. So the statements about EPA conclusions were taken out of the draft because the working group is not supposed to rely on other group's opinions, correct?
MR. LASKER: Objection to form, calls for speculation.

A. The working group is instructed to come up with their own interpretation of the data.
Q. Okay. And furthermore, with regard to the EPA review of the kidney study -- the mouse study that we're talking about, what is your understanding of the tumors that the EPA found in that study, the kidney study?
MR. LASKER: Objection to form.
A. My understanding of the scenario as I -- based on the information I have at the present time, if I'm allowed to talk about that...
Q. No.
I would prefer that you talk about what you knew at --
A. What you knew at this time?
Q. At the IARC.
A. At the IARC meeting --
Q. And you can include what is in this document that I was just talking about, number --
Hold on, let me --
A. 20?
Q. 20.

Yes, Exhibit 20.
A. My understanding at the time of the IARC review of glyphosate was that the initial pathologists report indicated there were no tumors in control, none in the low dose, one in the mid dose and three in the high dose.
I think that's correct, if I'm right.
(Witness looks at document.)
A. Yes.
None in control, one in the mid dose, and three in the high dose.
Q. And are you confirm --
Okay. Go ahead.
A. Okay. That was the initial pathologists review --
Q. Okay. In Exhibit 20 --
MR. LASKER: I don't think the witness has finished answering the question.
MS. FORGIE: I thought he was.
A. No.
I was going to say then we also had information about additional -- when they -- evidently when Monsanto got the report they asked to have a closer look at the kidneys.
The original pathologist came back and

said that he found an additional adenoma in the control animal.

When that information was sent to the EPA for their review, their pathologist could not confirm that there was an additional adenoma in the control group.

It was only when the EPA PWG came that the one tumor in the control animals showed up again.

Q. And is it your understanding that PWG, the pathology working group, was a group formed and funded by Monsanto?

MR. LASKER: Objection to form.

MS. FORGIE: I'll withdraw it.

A. I don't know.

MS. FORGIE: The question is withdrawn.

Q. So with regard to Exhibit 20 --

A. Uh-huh.

Q. -- this is the EPA stating that they do not see a tumor in the control group --

MR. LASKER: Objection to form.

Q. -- right?

MR. LASKER: This is not the EPA stating anything.

What are you talking about?

A. That's correct.

MS. FORGIE: Okay. That's not an appropriate objection and you know it.

MR. LASKER: Well, then read the document correctly.

Q. Were you aware that Monsanto was given drafts of the IARC 1112 monograph by Dr. Sorahan?

MR. LASKER: Objection to form.

Q. If you know?

A. I -- no, I didn't know that.

Q. Do you agree with Dr. Sorahan that it would not be appropriate to quote from draft IARC monographs?

MR. LASKER: Objection to form, it lacks foundation.

A. I...

Q. Let me state it another way.

Do you agree that it's inappropriate to use the draft monograph in any form?

MR. LASKER: Objection --

A. I would agree with that.

MR. LASKER: -- to form.

Q. Okay. And you would agree that there

were several versions of drafts and the only draft that was presented to you by Monsanto's counsel today was the second draft, the fourth revision?

A. Yes.

Q. If you look at Exhibit 18, you see that on the top?

A. Yes.

I saw it, yes.

Q. There were many, many other drafts and revisions; is that correct?

A. That's correct.

Q. And we don't know whether the sentences you were asked about, various sentences, we don't know if they were included in other drafts or not included, do you?

A. I do not recall.

That's right, I don't know.

Q. And you don't know if the sentences that you were asked about were taken in, taken out, put back in, taken out, you don't have any information about that right now, correct?

A. No.

Q. Okay. And that's why you don't use drafts because they're just simply drafts,

correct?

MR. LASKER: Objection to form.

A. They're working documents during the review process.

Q. You were asked several questions about the Greim paper, do you remember that?

A. Yes.

Q. Does the Greim paper support the proposition that glyphosate is carcinogenic in animals?

MR. LASKER: Objection to form, outside the scope.

Are you creating an expert deposition now, because you can change this to an expert deposition anytime you want?

MS. FORGIE: You can answer.

MR. LASKER: Objection to form, beyond the scope, calls for expert opinion.

MS. FORGIE: You can answer.

MS. HANLON: Do you feel like you're able to answer without invading into...

A. I would be giving an opinion.

MS. FORGIE: All right.

I'll withdraw that question.

Q. Was the raw data that was referenced

in the studies in the Greim report made available to IARC for review?

MR. LASKER: Objection to form.

A. It was -- the raw data was referred to in the document that we got as available -- being available on the Web site -- on a Web site that in my experience was very difficult to access.

And I think, as I testified earlier, I might have seen a printout of the table, but that's all I remember about the raw data that was referred to in the Greim paper.

Q. So as far as you're concerned as a member of the IARC 1112 Working Group the raw data was not available to you; is that correct?

MR. LASKER: Objection to form, misstates the testimony.

A. Not for the review that we did.

MS. FORGIE: Okay. I think I'm finished, but I want to take a three-minute break --

MR. LASKER: Sure.

MS. FORGIE: -- and discuss with my colleague.

How much time do I have left according

to his --

MR. LASKER: Let him go off the record first.

THE VIDEOGRAPHER: We're going off the video record. The time is 5:53 p.m.

(Recess taken.)

THE VIDEOGRAPHER: We're back on the video record. The time is 6 o'clock.

MS. FORGIE: Okay. Without agreeing that I'm limited to one hour, I'm going to reserve my remaining 12 minutes.

MR. LASKER: Very good.

Well, we should have done that beforehand.

Let's go off the record because we have to switch around.

We need to fix the camera.

THE WITNESS: We need to switch the camera.

THE VIDEOGRAPHER: We're going off the video record at 6:01 p.m.

(Recess taken.)

THE VIDEOGRAPHER: We're back on the video record. The time is 6:04 p.m.

EXAMINATION BY

MR. LASKER:

Q. Dr. Jameson, I just wanted to review some of the testimony you just provided in response to questions from plaintiffs counsel.

First of all, plaintiffs counsel asked you a question about certain statements that appeared in the draft monograph regarding the four animal studies upon which IARC based its conclusion as to the strength of the animal data for glyphosate, correct?

A. Correct.

Q. And she asked you about certain statements that assessed that data that appeared in the draft monograph we have, but that do not appear in the final monograph, correct?

A. Correct.

MS. FORGIE: Objection.

Q. And I believe your testimony -- and strike that.

You were the chair of the animal subgroup for purposes of assessing that animal data and preparing that section of the monograph, correct?

A. Correct.

Q. And you, in fact, also were assigned

the responsibility to be the initial drafter of that section of the monograph, correct?

A. That's correct.

Q. It is your testimony, though, that with respect to those statements about the animal data in those four key studies that appeared in the draft monograph, that you don't know when those statements were in the draft, when they were out of the draft, whether they were in various drafts and taken out, or anything about that, correct?

MS. FORGIE: Objection.

A. I don't remember the specifics of when they were in or were out, correct.

Q. Plaintiffs counsel also asked you about a document, 12-20, and I'd like to ask you a couple of questions about that, if I may.

Do you have that in front of you?

A. I will in just a second.

12-20. Okay.

Q. And plaintiffs counsel asked you a number of questions about what EPA had decided or not decided based upon this document.

Do you recall that?

A. Yes.

Q. Now this document is, in fact, a memorandum from an individual employee of EPA, correct?
A. It's signed by an individual employee, correct.
Q. And this sets forth this individual employee's assessment of what he saw in looking at various slides, correct?
MS. FORGIE: Objection.
MS. HANLON: Object to the form.
(Witness looks at document.)
A. It implies -- it says in this document that he had requested all the kidney sections from the male mice, and after selection of slides from all animals in which kidney tumors were diagnosed he studied them under the microscope.
Q. And the information in this portion of the memo is his interpretation as an individual employee of EPA, correct?
MS. HANLON: Object to form.
MS. FORGIE: Objection.
Q. And, in fact, he states in the results "My interpretation," correct, in this document?
MS. FORGIE: Where is that?

MR. LASKER: The first line under "Results."
(Witness looks at document.)
A. That's correct.
Q. Was it your understanding when you were preparing, when you were working on the IARC working group that this document reflected EPA's conclusion with respect to the tumors in the 1983 mouse study, the renal tumors?
MS. FORGIE: Objection.
A. This document to me reflected the evaluation of the tumors by an EPA -- by the EPA.
They had -- they had asked that somebody -- a pathologist at the EPA look at the slides, and this is the individual who looked at the slides.
And this is his interp -- evaluation of what the slides said.
Q. Okay. My question again, was it your understanding when you were analyzing this information for IARC that the EPA had concluded that the finding in the control animal was not reflective of a renal tumor?
MS. FORGIE: Objection --

MS. HANLON: Objection, form.
MS. FORGIE: -- asked and answered.
You can answer it again.
A. This is -- the document is from an EPA pathologist.
The EPA had said in -- I think in a previous document that they wanted the slides looked at again.
So this is the EPA pathologist who looked at the slides and these are his conclusions.
Q. Okay. That's not my question, though.
My question is, was it your understanding when you were on the IARC working group assessing this study and assessing the renal tumor findings in this study that the EPA had concluded that there was no tumor, no tumor in any of the control animals in this study?
MS. FORGIE: Objection, asked and answered and answered twice.
You may answer it a third time.
A. My interpretation of this document is that EPA wanted to have the slides evaluated by an EPA pathologist.
This is the EPA pathologist who

reviewed the slides and this is his report of his findings.
Q. That is not the answer to the question I asked.
My question is, is it -- was it your understanding when you were working on the IARC working group as the chair of the animal subgroup examining this study and examining the renal tumor data in this study that the EPA, not an individual at the EPA, but the EPA had determined that there were no renal tumors in the control animals in this study?
MS. HANLON: And I'm going to --
MS. FORGIE: Objection, asked and answered.
This is the fourth time you've asked it.
I'm sorry you don't like the answer, but you can't keep asking the same question.
This is the fourth time.
You're harassing the witness at this point.
Are you going to let him answer?
Hold on a second.
MS. HANLON: I join in the objection.

I will let the doctor if you feel like you're able to answer.
If you feel that the answer to the question you just heard is going to be a recitation of what you just said, please indicate thus.
A. I will repeat what I said before.
Q. Well, let me ask you this, isn't it a fact --
MS. FORGIE: Well, wait, do you want him to --
MR. LASKER: No, because he is just going to repeat the same answer.
I don't want it.
Q. Let me ask you this --
MS. FORGIE: Why not?
It's the same question.
Q. -- isn't it in fact correct that the EPA in its ultimate conclusion based upon information you had available to you determined that there was a tumor in a control animal in the -- a renal tumor in a control animal in the 1983 mouse study?
MS. FORGIE: Objection, asked and answered.

You may answer it.
A. There is a report from the EPA that says a PWG reviewed the slides and the PWG report indicates there is an adenoma in the control animals, in the control male mice.
Q. Let me ask you to look at Exhibit 12 --
MS. FORGIE: Wait.
Were you finished with your answer, Doctor?
THE WITNESS: Yeah.
Q. Let me ask you to look at Exhibit 12-22.
And this is a second peer review of glyphosate from 1991, correct?
MS. FORGIE: Hold on.
A. Okay. 1991.
Q. Second peer review by EPA, correct?
A. Uh-huh.
Q. And this is a document that has -- is signed by something like 15 to 20 different individuals at EPA, correct?
(Witness looks at document.)
A. Several of whom do not concur with the findings, correct.

Q. There are one person who wrote "nonconcur," correct?
A. There are two people who do not concur.
Q. There is one person that says "nonconcur" -- two people that said "not concur."
And some of these members were unable to attend the discussion, correct?
MS. FORGIE: Wait.
What's the question?
Q. Some people were not able to attend --
These were -- the people who are listed here as "nonconcur" were review members in absentia, correct, they could not attend the session?
MS. FORGIE: Objection.
MS. HANLON: Object to form.
A. It doesn't indicate so here.
Q. No. 2 were "Peer Review Members in Absentia."
It says absentia, but I think that's what it means, correct?
A. Okay. That says that they were unable to attend the discussion, but the signature

indicates concurrence with the overall conclusion.
Q. Okay.
A. So they did not concur with the overall conclusions.
Q. There were one, two, three, four, five, six, seven, eight, nine, 10, 11, 12, 13, 14, 15, 16, 17 EPA employees that signed on as agreeing with the overall conclusions, correct?
MS. FORGIE: Objection, misstates the document.
MR. LASKER: You can count it yourself.
MS. FORGIE: That's not the part of it that's wrong.
MS. HANLON: What's your question?
Q. There are one, two, three, four, five, six, seven, eight, nine, 10, 11, 12, 13, 14, 15 individuals who sign on as agreeing with the overall peer review analysis and two additional who sign on stating that the final report is accurate, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
A. There are that many signatures there,

yes.
Q. And if you can look to page 11 of this document.
It isn't 11.
Hold on, sorry.
13 of this document.
When the second peer review panel for EPA discusses the tumor data, the renal tumor data at Section b. they state, "Glyphosate produced an equivocal carcinogenic response in males characterized by an incidence of renal tubular neoplasms of 1 out of 49, 0 out of 49, 1 out of 50, and 3 out of 50," correct?
A. That's what the document states.
Q. And so EPA's view, at least of this second peer review and the 17 individuals who signed onto this document, was that there was a tumor found in a control animal in this -- a renal tube -- in a kidney in this study, correct?
MS. FORGIE: Objection, calls for speculation.
(Witness looks at document.)
A. I'm sorry, could you restate that question again.

I was reading something.
Q. Sure.
The EPA in its second peer review in this document signed by 17 EPA employees stated that in characterizing incidence of renal tumors in this 1983 mouse study, stated that there was a tumor in a control animal found in this study, correct?
MS. FORGIE: Objection.
MS. HANLON: Objection, form.
A. It -- yes, it indicates the data that this peer review panel review included a control -- an adenoma in the control group.
Q. And you mentioned previously in your testimony in response to plaintiffs counsel that it was your understanding at the time that you were on the IARC working group that EPA had classified glyphosate as a Group C possible carcinogen; is that correct?
MS. FORGIE: Objection.
A. The EPA had at one time classified it as a Class C, correct.
Q. So maybe I misunderstood your testimony.
You were not testifying that at the

time that you were reviewing this for IARC that EPA considered glyphosate to be a Class C possible carcinogen, are you?
A. I don't remember -- I mean they've changed their classification so many times, I don't remember what it was.
Q. How many times is it your understanding that EPA changed its classification --
A. I think it's three --
MS. FORGIE: Wait, wait, wait.
Let him finish with the question and then let me get my objection.
I'm sorry.
I know it's the end of the day, but we do still have to follow the process.
THE WITNESS: Sorry.
MS. FORGIE: That's okay.
Is the question --
What is the question?
Q. How many times is it your understanding that the EPA has changed its classification of glyphosate with respect to carcinogenicity?
MS. FORGIE: Objection.

A. My understanding is it has done it three times.
Q. If you can look at the 12-22, at the first page -- it's the second page of the document, but the first page of the peer review analysis signed by the 17 EPA employees.
It states there that "The Health Effects Division Carcinogenicity Peer Review Committee" --
MS. FORGIE: Wait, where are you?
MR. LASKER: The first full page of the memorandum, at the very top.
MS. FORGIE: Page 3?
MR. LASKER: Page 1 of the document.
MS. FORGIE: Oh, okay.
At the bottom.
You said the top and I --
Q. In 1991 the second peer review of EPA concluded that glyphosate was "classified as a Group E (evidence of noncarcinogenicity for humans)," correct?
A. Where are you reading?
I can't -- I don't see that.
Q. The --
A. Oh, the last paragraph?

Q. It's actually the first paragraph on that page, "The Health Effects Division" -- and "The Committee" -- the last sentence in that paragraph -- "The Committee concluded that glyphosate should be classified as Group E (evidence of noncarcinogenicity for humans), based upon lack of convincing carcinogenicity evidence in adequate studies in two animal species," correct?
A. Okay. Yeah, that's what it says.
Q. Do you believe, is it your understanding that EPA has ever changed that classification of glyphosate since 1991?
MS. FORGIE: Objection.
A. My understanding is that's their last one, yeah.
Q. So EPA has not changed at any time since then its classification of glyphosate to your knowledge, correct?
MS. FORGIE: Objection, this is way beyond the scope.
MR. LASKER: This is exactly what you asked him in your questions.
You're the one who asked the questions.

MS. FORGIE: No, it's not.
I asked him about exhibits that you put in front of him --
MR. LASKER: You asked him about Group C.
Q. Dr. Jameson, you know for a fact, don't you, that EPA has never changed its classification of glyphosate as a Group E carcinogen since 1991, don't you?
MS. HANLON: Objection, form.
MS. FORGIE: Objection.
A. But that's not the point.
Q. I'm asking you the question, you testified in response to plaintiffs counsel that EPA had classified glyphosate as a Group C possible carcinogen, but you know for a fact that since 1991 EPA has consistently classified glyphosate as Group E, evidence of noncarcinogenicity, don't you?
MS. FORGIE: Objection --
MS. HANLON: Form.
MS. FORGIE: -- mischaracterizes his testimony, and you're arguing with the witness, and this is way beyond the scope.
A. I don't know that for a fact.

To be honest with you, I don't know if they've changed it since 1991 or not.
I know prior to 1991 when we started looking at the data from the mid-'80s, at that time it was classified as a Group C.
And then evidently they got some more information and they said they couldn't evaluate it.
And then after that it went to a not carcinogen or whatever.
Q. After they obtained additional information beyond that, correct?
A. Evidently.
I guess that's what they based it on.
Q. Okay. And you testified you were not aware of what information EPA reviewed in reaching its conclusion with respect to glyphosate and carcinogenicity, correct?
MS. FORGIE: Objection, mischaracterizes his testimony.
A. I'm sorry?
Q. During the questioning from plaintiffs counsel she asked you if you were aware of what materials EPA reviewed in reaching its determination about glyphosate and

carcinogenicity and you said you don't know.
MS. FORGIE: Objection.
Q. Am I misstating your testimony?
A. I don't remember saying that.
But if it's recorded, you know, then I misspoke.
Q. Okay. So you are aware of the information that EPA considered in reaching its conclusions?
A. Based on the document --
MS. FORGIE: Objection.
A. Based on the documents that I received in the IARC review for the IARC monograph, I know what data they used -- they outlined in their reports.
Q. And you had also testified in response to plaintiffs questioning, you provided some information about the epidemiology subgroup for Working Group 112 and the Bradford Hill criteria.
Do you recall that testimony?
MS. FORGIE: Objection, mischaracterizes the testimony.
A. I'm sorry, would you repeat that.
I don't understand the question.

Q. Sure.
In response to questions from plaintiffs counsel about other methodologies or other guidelines that the Working Group 112 would have been using in its assessment of glyphosate, you referred to the assessment that the epidemiology group would have conducted using a Bradford Hill criteria, correct?
MS. HANLON: Object to form.
MS. FORGIE: Objection, mischaracterizes the testimony.
A. The Bradford Hill criteria is specifically identified in the preamble in the directions for review of epidemiology data.
Q. And were you aware during the IARC working group and when you were in plenary session that Dr. Blair had epidemiological data, updated data from the agricultural health study and also additional data from the North American pooled projected regarding findings, epidemiological findings for glyphosate and cancer that he had not disclosed to the rest of the working group?
MS. FORGIE: Objection, mischaracterizes his testimony.

A. Was I --
No, I wasn't aware of any data he didn't bring up.
I didn't -- but, you know, I didn't -- no, I did not know.
Q. And you discussed in your testimony how it's important for the public to be able to make an informed decision about substances and about the data that's available with respect to substances and whether or not they might be associated with cancer, correct?
MS. FORGIE: Objection.
Can I have that question read back, please.
(Record read.)
MS. FORGIE: Objection.
A. No.
Q. Do you recall that testimony at the very beginning of your --
A. I didn't say anything about the data.
Q. Oh, okay.
So am I -- if I'm clear then -- let me restate that.
Is it your testimony then that it's not important for the public to have access to

all of the available data and able to make a determination with respect to whether a substance might be associated with cancer?
MS. FORGIE: Objection --
A. No --
MS. HANLON: Form.
MS. FORGIE: -- this is too far beyond the scope.
A. No, I did not say that.
Q. Okay. Let me --
So is it your testimony --
A. You said I said it is not --
MS. FORGIE: Wait, wait, wait.
MR. LASKER: Okay. Let me get the double negatives out.
We'll try this again, okay?
MS. FORGIE: Let's follow the format.
I know it's the end of the day, but please --
MR. LASKER: Sorry.
I'll ask you the affirmative question.
MS. FORGIE: -- let's do questions, objections, and then answers.
Q. Dr. Jameson, do you believe it is important for the public to have access to all

scientific data with respect to a chemical and its potential association with cancer?
MS. FORGIE: Objection, this is so far beyond the scope.
You're asking his opinion about data and what the public should know about data?
That's incredible.
A. I said nothing about data.
Q. My question still stands.
Do you believe it's important for the public to have access to all available data, scientific data with respect to whether a chemical might be associated with cancer?
MS. FORGIE: Objection.
MS. HANLON: Object to the form.
MS. FORGIE: He hasn't even had time to think about these things, they're so far outside the scope.
I object.
I'm very close to instructing him not to answer.
A. Everybody should have access to as much information as they need to make an informed decision.
MR. LASKER: Thank you.

I have no further questions.
MS. FORGIE: Let me have a minute, if that.
MR. KALAS: Reserve before we go --
MR. LASKER: I actually don't think we -- the way that these have been going, I don't think we've been able to -- we've been having recross in any of these depositions, but maybe I'm mistaken.
Have we had recourse in any --
Then I'm wrong.
I take it back.
MS. FORGIE: And it gives me great pleasure to say, Eric, you're wrong.
MR. LASKER: Okay. Well, I stand corrected.
Although I accept that from Mr. Kalas.
Not that I don't trust you, but --
MS. FORGIE: We always accept it from John.
THE VIDEOGRAPHER: We're going off the video --
MR. LASKER: And that's the final word on the record.
MR. KALAS: I'm good at that.

THE VIDEOGRAPHER: We're going off the video record. The time is 6:26 p.m.
(Recess taken.)
THE VIDEOGRAPHER: We're back on the video record at 6:32 p.m.
EXAMINATION BY
MS. FORGIE:
Q. Okay. Doctor, you were asked questions about some EPA memos, Exhibits 20, 21, 19, I think, do you recall being asked questions about EPA memos from 1985 and 1986?
A. Yes.
Q. And I think there was one memo from 1991 as well, do you recall that?
A. Yes.
Q. And do you have any idea how many other memos, EPA memos and documents exist between 1985 and 1991 that you have not read?
A. How many EPA documents...
Just EPA documents?
MR. LASKER: Object to form on that, that's...
Q. Do you have any idea how many memos EPA may have generated between 1985 and 1991 that you haven't read?

A. I can't fathom a guess.
MR. LASKER: Form.
Q. And let me rephrase it on advice of a much higher source.
Do you have any idea how many memos EPA has generated between 1985 and 1991 that relate to glyphosate, any idea?
A. I have no idea.
Q. And so you haven't -- since you don't have any idea how many there are, you don't have any idea what could be in those memos, do you?
A. No.
Q. Okay. And you were asked earlier if it was important for the public to have access to data, correct?
Do you remember those questions?
A. I do, yes.
I remember the question.
Q. Okay. But it would be important for the public to have access to peer reviewed published date, correct?
MR. LASKER: Objection to form.
Q. Because unpublished data in draft form could have all sorts of underlying issues that have not been properly addressed; is that right?

MR. LASKER: Objection to form.
A. That -- that's correct.
It would not be beneficial to individuals to get draft documents because it would be confusing.
Because they are a work in progress.
They're not final and they may mislead the -- especially the public who may not understand all the technical terms anyway, the meaning of what's being said.
But -- what...
MS. FORGIE: Okay. Thank you.
THE WITNESS: I guess -- okay.
Leave it at that.
MS. FORGIE: Okay. I'll reserve my last four minutes.
EXAMINATION BY
MR. LASKER:
Q. Okay. With respect to the EPA documents that you reviewed or did not review in connection with your work on the IARC working group, you reviewed the materials that IARC gave you, correct?
MS. FORGIE: Objection.
A. That's accurate.

I reviewed the documents that IARC was able to get from the EPA.

Q. And there was an EPA employee on that working group, correct?

A. There was an EPA employee who was a member of the IARC working group for Volume 112.

Q. And that employee, just to be clear, was appearing in his individual capacity, not as a representative of the EPA, correct?

MS. FORGIE: Objection --

MS. HANLON: Objection, form.

MS. FORGIE: -- calls for speculation.

A. You -- when a member -- when an individual is asked to participate in the working group they are as an individual and not representing their organization or institution.

Q. And did you at any time during the working group ask this EPA employee if there was other information the EPA had about glyphosate?

A. I don't recall that I did.

MR. LASKER: No further questions.

MS. FORGIE: Nothing further.

MS. HANLON: We'll read.

MR. LASKER: You're done.

THE VIDEOGRAPHER: This concludes the

videotaped deposition of Charles W. Jameson, Ph.D., consisting of five video media disks. The time is 6:36 p.m. We're going off the record.

(Time noted: 6:36 p.m.)

_____

CHARLES W. JAMESON

Subscribed and sworn to before me this _____ day of _____, 2017.

_____ _____

(Notary Public) My Commission Expires:

C E R T I F I C A T E

STATE OF FLORIDA)
: ss.
COUNTY OF LEE)

I, DONALD R. DePEW, a Registered Professional Reporter, Certified Realtime Reporter, Florida Professional Reporter, and Notary Public within and for the State of Florida at Large, do hereby certify:

That CHARLES W. JAMESON, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by the witness.

I further certify that I am not related to any of the parties to this action by blood or marriage, and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 7th day of May, 2017.

_____

DONALD R. DePEW, RPR, CRR, FPR

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	MS. FORGIE	294, 355

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Exhibit 2 Seven-page document entitled Dr. Jameson's Objections and Responses to Monsanto's Notice of Deposition of Dr. Jameson	7	6
Exhibit 3 Multipage document entitled C.W. Jameson - Curriculum Vitae and Bibliography	7	18
Exhibit 4 One-page e-mail chain, first e-mail to Bill Jameson from Neil S. Bromberg, dated 8/10/16	8	7
Exhibit 5 One-page document entitled Pretrial Order No. 16: Additional Discovery Re IARC	10	22

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Exhibit 6
Ten-page letter to Honorable.....13 1
Vince Chhabria from Joe Hollingsworth,
Michael Miller, Aimee Wagstaff and
Robin Greenwald, dated 4/4/17

Exhibit 7

One-page document entitled Pretrial.....13 7
Order No. 22: Jameson and Ross Depositions
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Four-page document entitled Document.....67 24
Requests, bearing Bates stamp Nos. Jameson
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Four-page document entitled Vol 112 -.....142 14
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Evaluation of carcinogenic potential of the
herbicide glyphosate, drawing on tumor
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Exhibit 17
Seven-page e-mail chain, first e-mail.....171 20
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112-Monograph 04-Glyphosate, Section 3,
2nd Draft.rev4, bearing Bates stamp Nos.
MONGLY01616857 through MONGLY01616874

Exhibit 19

Five-page document entitled US EPA.....215 3
Archive Document, with attached Memorandum
to Robert Taylor from William Dykstra,
dated 4/3/85

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Exhibit 20
Three-page document entitled US EPA.....215 16
Archive Document, with attached Memorandum
to William Dykstra from Louis Kasza,
dated 12/4/85

Exhibit 21

Ten-page document entitled US EPA.....216 8
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Exhibit 23

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WITNESS: _____
DATE(S): _____
CASE: _____
I wish to make the following changes, for the
following reasons:
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CHANGE TO: _____

Subscribed and sworn to before me this _____ day
of _____, 2017.

_____

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