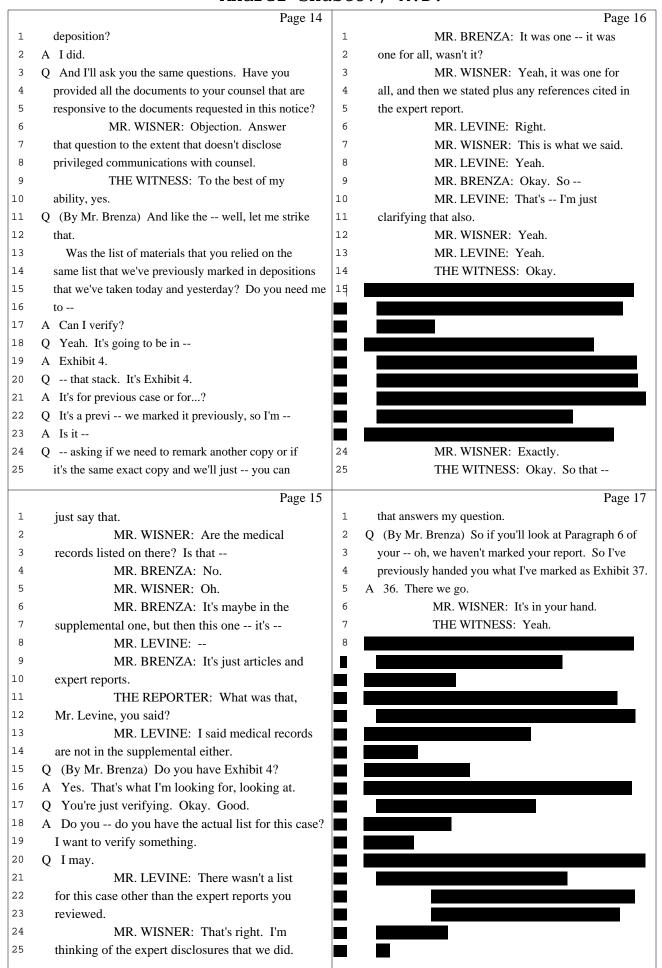
## EXHIBIT 3

0	01	
2	UNITED STATES DI	STRICT COURT
3		
4	NORTHERN DISTRICT	OF CALIFORNIA
5		
6		
7		
8	IN RE: ROUNDUP PRODUCTS	)
9	LIABILITY LITIGATION	)
10		)
11		) MDL No. 2741
12	This document relates to:	)
13		) Case No. 16-md-02741-VC
14	Stevick v. Monsanto Co., et al.	)
15	Case No. 3:16-cv-2341-VC	)
16		)
17		)
18		)
19		
20		
21	VIDEOTAPED DEPOSITION OF	ANDREI SHUSTOV, M.D.
22		
23	December 1	6, 2018
24		
25	Seattle, Was	hington

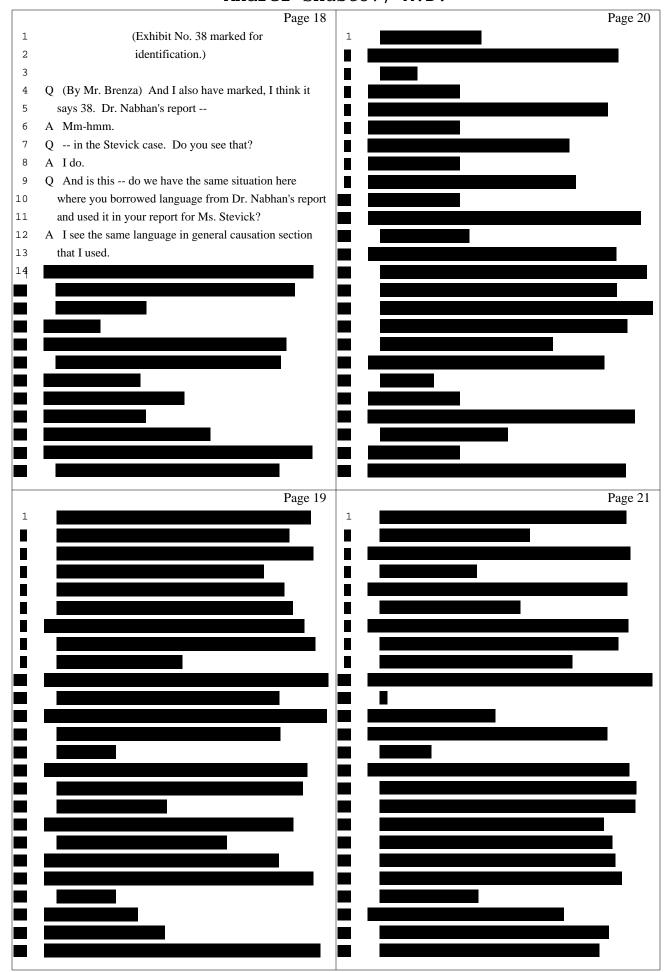
Dono	2	Do 4
Page  1 APPEARANCES	2   1	Page 4 BE IT REMEMBERED that on Sunday,
1 APPEARANCES	2	December 16, 2018, at 1900 Fifth Avenue, Seattle,
For the Plaintiff:		
	3	Washington, at 2:35 p.m., before JOHN M.S. BOTELHO,
R. BRENT WISNER, ESQ. Baum, Hedlund, Aristei & Goldman 10940 Wilshire Boulevard	4	Certified Court Reporter, appeared ANDREI SHUSTOV,
10940 Wilshire Boulevard 5 17th Floor	5	M.D., the witness herein;
Los Angeles, California 90024 310.207.3233	6	WHEREUPON, the following
6 310,207.3233	7	proceedings were had, to wit:
rbwisner@baumhedlundlaw.com	8	
For Defendant Monsanto Co.:	9	<<<<>>>>>
AARON H. LEVINE, ESO.	10	
DAVID KERSCHNER, ESQ. Arnold & Porter Kaye Scholer, LLP 250 West 55th Street New York, New York 10019	11	(Exhibit Nos. 36 and 37
250 West 55th Street New York, New York 10019	12	marked for identification.)
212.836.8000	13	
aaron.levine@arnoldporter.com david.kerschner@arnoldporter.com	14	THE VIDEOGRAPHER: We are on record
david.kerscnner@arnoidporter.com	15	at 2:35 p.m. on Sunday, December 16, 2018, in the
For Defendant Bayer:	16	matter of Stevick vs. Monsanto. The deponent today
LINDLEY J. BŘENZA, ESQ. Bartlit Beck, LLP	17	is Dr. Andrei Shustov.
1801 Wewatta Street	18	Will counsel and counsel please identify
Suite 1200 Denver, Colorado 80202	19	themselves for the record, and then the court
303.592.3100		,
lindley.brenza@bartlitbeck.com	20	reporter may swear in the witness.
Also present: Allison Borgida, videographo	er 21	MR. WISNER: Brent Wisner on behalf
21	22	of the deponent and the plaintiffs in this case.
22	23	MR. BRENZA: Lin Brenza with
23 24	24	Bartlit Beck on behalf of Bayer.
25	25	MR. KERSCHNER: David Kerschner
Page	3	Page 5
1 EXAMINATION INDEX	1	from Arnold & Porter on behalf of Monsanto.
2 EXAMINATION BY: PAGE NO.	2	MR. LEVINE: Aaron Levine from
3 Mr. Brenza 6 4 Mr. Wisner 80	3	Arnold & Porter on behalf of Monsanto.
5	4	MR. WISNER: Technically Bayer is
6 EXHIBIT INDEX 7 EXHIBIT NO. DESCRIPTION PAGE N	rO 5	not a party to this case.
8 Exhibit No. 36 Monsanto Company's Notice to 4	6	MR. BRENZA: I don't know.
Take Oral and Videotaped	7	MR. WISNER: Okay.
9 Deposition of Dr. Andrei Shustov.	8	MR. BRENZA: I'll be on behalf of
Silustov.		
Exhibit No. 37 Expert Report of Dr. Andrei 4	9	Monsanto if you want me to be.
11 R. Shustov. 12 Exhibit No. 38 Expert Report of Dr. Chadi 18	10	MR. WISNER: Okay.
Nabhan.	11	MR. BRENZA: So I'm sorry. Go
Exhibit No. 39 Clinical Summary for Elaine 56	12	ahead.
M. Stevick dated 9/6/2018.	13	AND DELGAMOTON AND A STATE OF THE STATE OF T
Labeled	14	ANDREI SHUSTOV, M.D., having been first duly sworn
15 Confidential-Stevick-EStevick -KPNValley-MD-000010.	15	by the Certified Court
16	16	Reporter, deposed and
Exhibit No. 40 Decision/Reason, dated 60 7/14/2016. Labeled	17	testified as follows:
17 7/14/2016. Labeled Confidential-Stevick-EStevick	18	
-PPR-000158.	19	MR. WISNER: Before you begin, sir,
19 Exhibit No. 41 Office visit for Elaine M. 62 Stevick dated 8/2/2018.	20	just the same objections as last time. He's being
20 Labeled	21	offered for a specific cause only, not general cause,
Confidential-Stevick-EStevick	22	and this is related specifically to Mrs. Stevick's
21 -KPNValley-MD-005067. 22	23	case.
	24	////
23	44	////
25 24 25	25	//// ////







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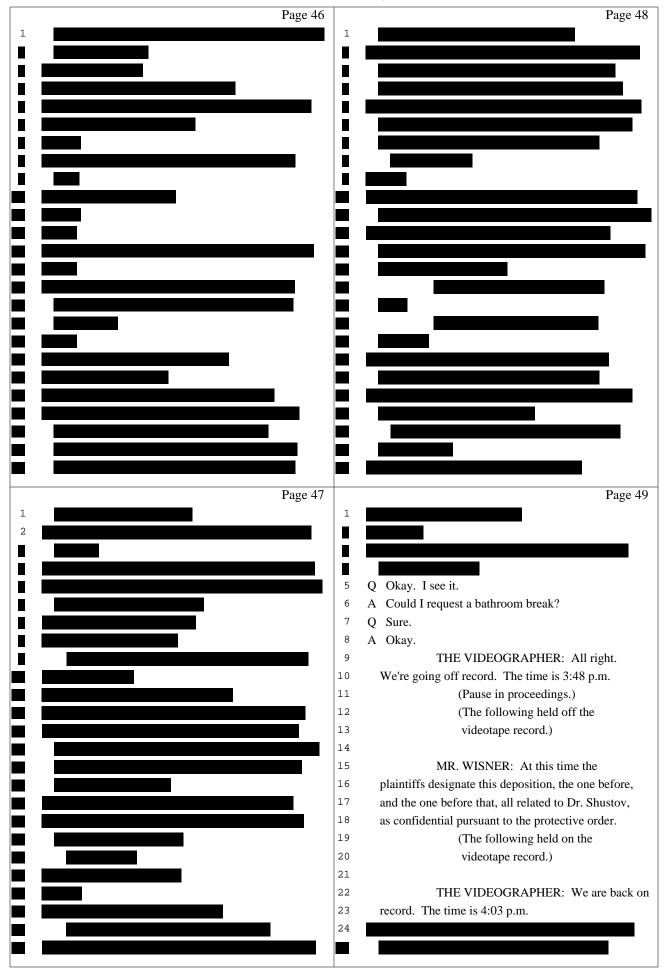




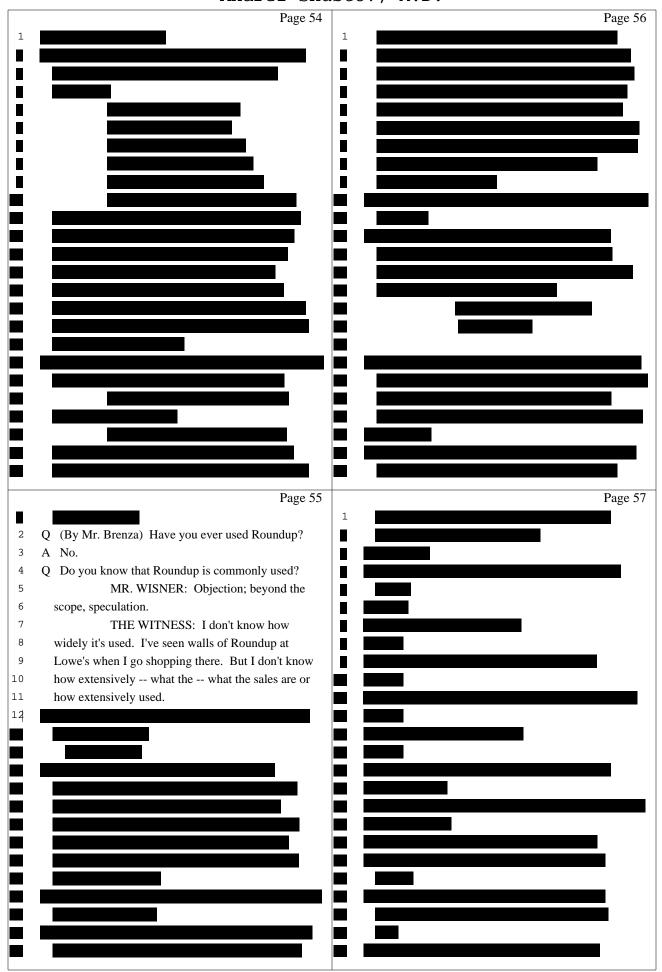


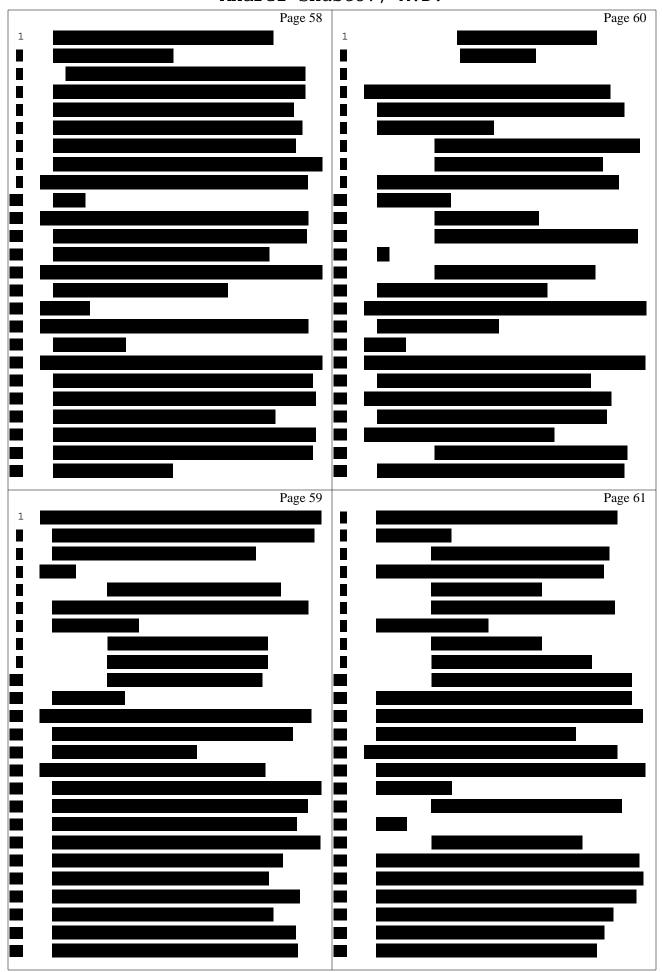


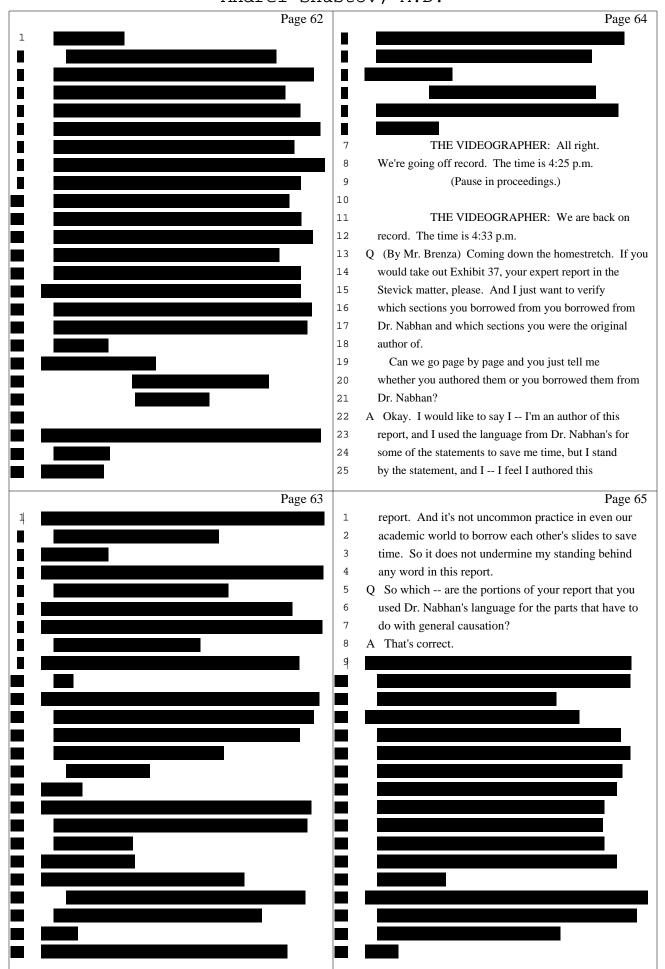




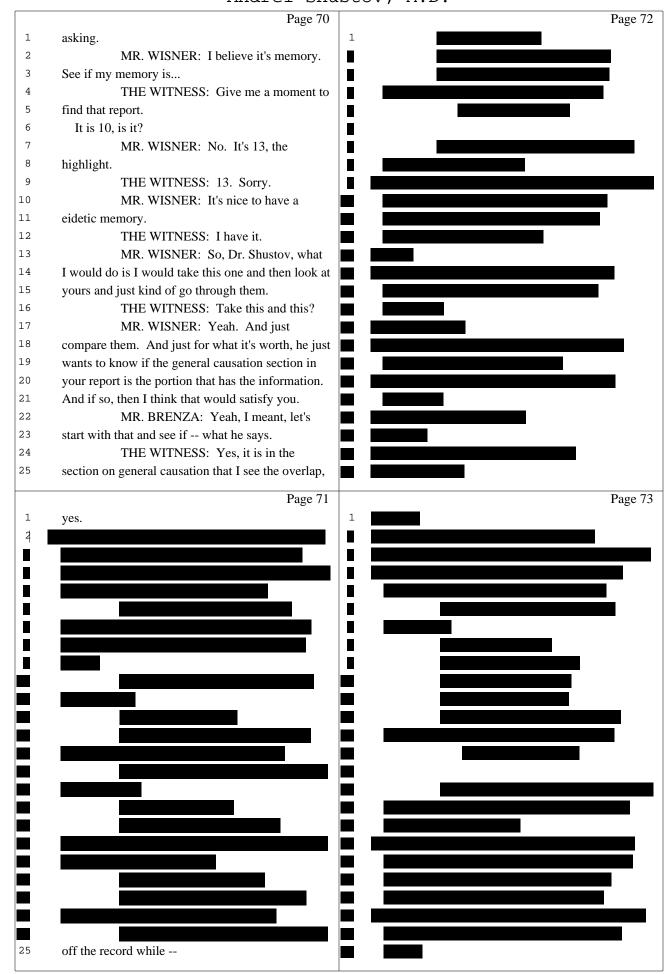


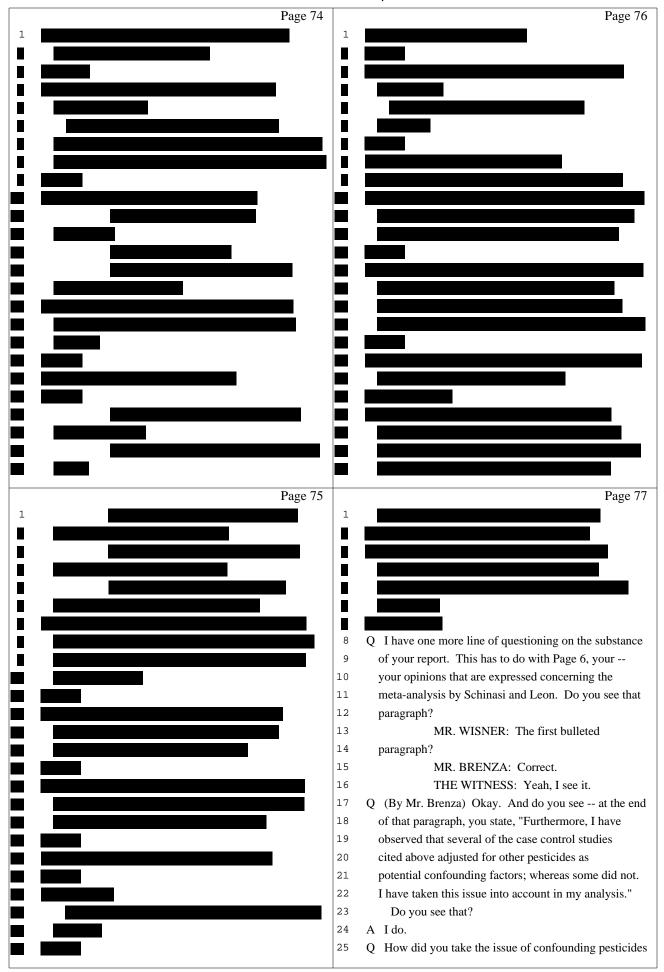




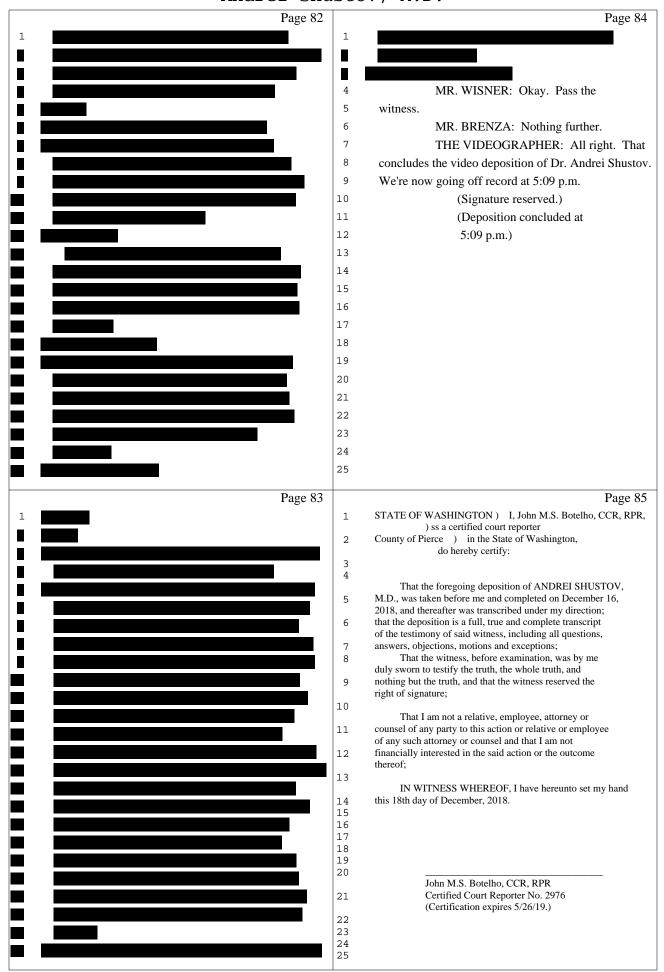








	D 70	T	Daga 90
	Page 78		Page 80
1	in the studies relied on in the Schinasi	1	paper. I did not do any specific considerations or a
2	meta-analysis, how did you take that into account in	2	specific analysis on
3	your analysis?	3	MR. BRENZA: Okay. That's all I
4	A I gave to go again. It's at the time of writing,	4	have. Thank you. Pass the witness.
5	I had I decided that this was the, again, proper	5	MR. WISNER: Thank you.
6	way of state how I adjusted my impression from those	6	
7	studies.	7	
8	Q Are you done?	8	EXAMINATION
9	A I don't what?	9	BY MR. WISNER:
10	Q You still answering, or?	10	Q Couple quick questions, Doctor. We'll get you out of
11	A Yes, I'm trying to still think how to answer your	11	here. It's been a long
12	question.	12	A Sure.
13	Q Okay.	13	Q couple of days.
14	A I can't tell you specifics how exactly I adjusted	14	A Appreciate it.
15	that without, again, opening discussion of those	15	Q The first is on the confounding issue that we were
16	publications. 'Cause I don't explain specifically	16	just talking about. When you say "taking into
17	how I did it.	17	account," does that just mean you looked and see if
18	Q And you don't remember, as you sit here now, how you	18	those studies did adjust or did not adjust?
19	took account of whether they control or didn't	19	A At the level that I looked at those papers, I did not
20	control for confounding pesticides?	20	do any specific analysis on general causation papers.
21	A I don't recall my train of thought at the time.	21	Q Sure. And yesterday I believe we actually discussed
22	Q Do you recall your analysis, how you took it into	22	one of the articles. It was De Roos 2003. I believe
23	account in your analysis?	23	it was Exhibit 20?
24	A As we discussed before for general causation	24	A I remember the paper. I don't remember the number of
25	analysis, I performed very brief review of the	25	exhibit.
	Page 79		Daga 91
	1 age 17		Page 81
1	literature that we went over several times and looked	1	Q Okay. It was Exhibit 20. And that was the study
1 2	_	1 2	_
	literature that we went over several times and looked		Q Okay. It was Exhibit 20. And that was the study
2	literature that we went over several times and looked at the limited amount of information in tables, and	2	Q Okay. It was Exhibit 20. And that was the study where they adjusted for 47 other pesticides. Do you
2 3	literature that we went over several times and looked at the limited amount of information in tables, and without having a deep dive into general causation,	2 3	Q Okay. It was Exhibit 20. And that was the study where they adjusted for 47 other pesticides. Do you recall?
2 3 4	literature that we went over several times and looked at the limited amount of information in tables, and without having a deep dive into general causation, that really is not my area of expertise. So I	2 3 4	<ul><li>Q Okay. It was Exhibit 20. And that was the study where they adjusted for 47 other pesticides. Do you recall?</li><li>A I remember that.</li></ul>
2 3 4 5	literature that we went over several times and looked at the limited amount of information in tables, and without having a deep dive into general causation, that really is not my area of expertise. So I don't I can't give you specifically, without	2 3 4 5	<ul> <li>Q Okay. It was Exhibit 20. And that was the study where they adjusted for 47 other pesticides. Do you recall?</li> <li>A I remember that.</li> <li>Q Okay. And you remember we discussed there's language</li> </ul>
2 3 4 5 6	literature that we went over several times and looked at the limited amount of information in tables, and without having a deep dive into general causation, that really is not my area of expertise. So I don't I can't give you specifically, without looking at the studies again in area of general	2 3 4 5 6	<ul> <li>Q Okay. It was Exhibit 20. And that was the study where they adjusted for 47 other pesticides. Do you recall?</li> <li>A I remember that.</li> <li>Q Okay. And you remember we discussed there's language in there showing that these other pesticides, for</li> </ul>
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