

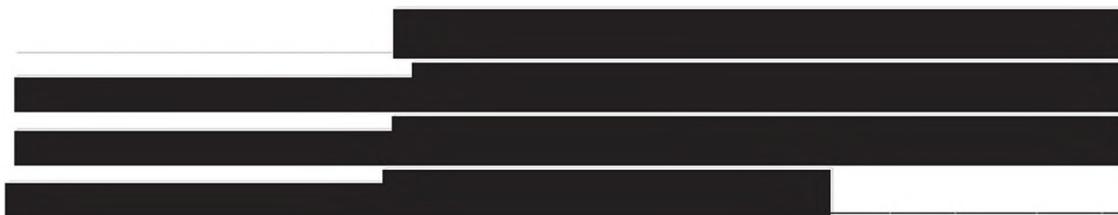
# FINAL PLAYED

---

Reeves, William 01-23-2019

Reeves, William 01-24-2019

---



Page/Line	Source	ID
10:11 - 10:21	<b>Reeves, William 01-23-2019 (00:00:19)</b> 10:11 Q. Good morning, sir. 10:12 A. Good morning. 10:13 Q. My name is Brent Wisner, and I represent 10:14 the plaintiff in this lawsuit. I understand you have 10:15 been put forward as a witness to testify on behalf of 10:16 Monsanto; is that correct? 10:17 A. That's correct. 10:18 Q. What is your understanding of what your 10:19 role is here? 10:20 A. My role here is to represent the company 10:21 and speak on their behalf.	REEVES_COMBINED_03A
12:12 - 12:20	<b>Reeves, William 01-23-2019 (00:00:13)</b> 12:12 Q. You also understand that you're under oath 12:13 here? 12:14 A. Yes. 12:15 Q. What is your understanding of that oath? 12:16 A. My job is to tell the truth. 12:17 Q. Great. And although we are not in a 12:18 courtroom right now, you understand this is a formal 12:19 court proceeding? 12:20 A. Yes, I do.	REEVES_COMBINED_03A
15:20 - 16:2	<b>Reeves, William 01-23-2019 (00:00:10)</b> 15:20 Q. Do you have a scientific background? 15:21 A. Yes, I do. 15:22 Q. What is that? 15:23 A. I have a PhD in toxicology and a 15:24 bachelor's degree in biology. 16:1 Q. And where did you get your PhD from? 16:2 A. Texas A&M.	REEVES_COMBINED_03A
16:8 - 16:16	<b>Reeves, William 01-23-2019 (00:00:15)</b> 16:8 Q. And where did you go to undergrad? 16:9 A. University of Missouri. 16:10 Q. And how long have you been -- are you 16:11 employed at Monsanto? 16:12 A. Yes, I am. 16:13 Q. Now Bayer, I assume? 16:14 A. Bayer. That's right. 16:15 Q. How long have you worked there? 16:16 A. Twelve years.	REEVES_COMBINED_03A

Page/Line	Source	ID
33:15 - 33:20	<b>Reeves, William 01-23-2019 (00:00:12)</b> 33:15 Q. (By Mr. Wisner) And in the animal 33:16 toxicology realm, Monsanto has done two animal 33:17 toxicology studies; correct? 33:18 A. We have three there, so it's -- 33:19 Q. Two rat, one mouse? 33:20 A. That's right.	REEVES_COMBINED_03A
154:5 - 154:22	<b>Reeves, William 01-23-2019 (00:00:40)</b> 154:5 Q. So we have the AHS. And I want to talk to 154:6 you a little bit about the AHS. And I understand it's 154:7 Monsanto's position -- correct me if I'm wrong -- that 154:8 you guys believe the AHS is the most reliable and best 154:9 of the epidemiological studies? 154:10 A. Our position is that the agricultural 154:11 health study with -- as envisioned -- as described at 154:12 the case control studies that they've done -- or I'm 154:13 sorry, as the cohort study -- provides the most 154:14 comprehensive look at pesticide exposure and health 154:15 risk, particularly with respect to glyphosate and 154:16 cancer. 154:17 Q. Do you believe there's any problems with 154:18 the study? 154:19 A. With the agricultural health study? Is 154:20 there a particular part of it? This is a very -- so 154:21 it's a very large study that looks at a lot of 154:22 different endpoints.	REEVES_COMBINED_03B
155:12 - 155:19	<b>Reeves, William 01-23-2019 (00:00:18)</b> 155:12 Q. (By Mr. Wisner) Well, fair enough. I'm 155:13 not talking about the overall AHS study. I'm talking 155:14 about these two publications right here in front of us 155:15 that relate to glyphosate; right? 155:16 A. That is correct. 155:17 Q. And so my question is, does Monsanto right 155:18 now have any criticisms of the AHS's analysis of 155:19 Roundup?	REEVES_COMBINED_03C
155:21 - 156:14	<b>Reeves, William 01-23-2019 (00:00:33)</b> 155:21 A. Could you help me understand your question 155:22 a little more? Just in terms of -- 155:23 Q. (By Mr. Wisner) What don't you understand 155:24 about my question?	REEVES_COMBINED_03D

Page/Line	Source	ID
	156:1 A. Well, is there a document that you're 156:2 talking about, or is it just in general speaking at a 156:3 very high level about these two studies? 156:4 Q. Listen, you're here to speak for Monsanto 156:5 about its views and positions regarding epidemiology; 156:6 right? 156:7 A. Yes, I am. 156:8 Q. And I'm talking about two epidemiology 156:9 studies, and I'm just asking you straightforward, do 156:10 you think there are anything wrong with those studies? 156:11 A. We believe that both of those studies are 156:12 of high quality and do provide valuable information. 156:13 Q. So there's no criticisms that you can 156:14 think of offhand?	
156:16 - 156:17	<b>Reeves, William 01-23-2019 (00:00:04)</b>	REEVES_COMBINED_03-FINAL PLAYED
	156:16 A. We would have to go through the study 156:17 line-by-line to understand that.	
156:24 - 157:5	<b>Reeves, William 01-23-2019 (00:00:13)</b>	REEVES_COMBINED_03-FINAL
	156:24 Q. Now, it's true that numerous Monsanto 157:1 employees have made comments about the AHS before the 157:2 results were learned about; correct? 157:3 A. That is true. 157:4 Q. And those comments about the AHS were not 157:5 particularly flattering, were they?	
157:8 - 157:11	<b>Reeves, William 01-23-2019 (00:00:07)</b>	REEVES_COMBINED_03-FINAL
	157:8 A. Sorry. Is there a document that you'd 157:9 like to discuss? 157:10 Q. (By Mr. Wisner) Sure, we can go through 157:11 them. I'll hand you Exhibit 20 to your deposition.	REEVES_COMBINED_03-FINAL
157:16 - 158:14	<b>Reeves, William 01-23-2019 (00:00:40)</b>	REEVES_COMBINED_03-FINAL
	157:16 Q. So this is a document. It's dated July 157:17 22nd, 1997; right? 157:18 A. That is correct. 157:19 Q. And this is obviously before Monsanto knew 157:20 of any of the results of the agricultural health study 157:21 as it relates to Roundup? 157:22 A. That is correct. 157:23 Q. And this was a document prepared by John 157:24 Acquavella? 158:1 A. Yes.	REEVES_COMBINED_03-FINAL

Page/Line	Source	ID
	158:2 Q. And he had at this time was an 158:3 epidemiologist employed by Monsanto? 158:4 A. That is correct. 158:5 Q. And just by curiosity, does Monsanto 158:6 currently employ any epidemiologists? 158:7 A. Not to my knowledge, no. 158:8 Q. After Dr. Acquavella left, do you know if 158:9 they ever hired an epidemiologist as an employee? 158:10 A. Not to my knowledge. 158:11 Q. So this is July 22nd, 1997, and he 158:12 prepares this document to the communications 158:13 subcommittee. Do you see that? 158:14 A. That is correct.	
159:11 - 159:15	<b>Reeves, William 01-23-2019 (00:00:08)</b>	REEVES_WILLIAM_01-23-15
	159:11 Q. (By Mr. Wisner) Well, this was a document 159:12 produced to us by your company in this litigation, and 159:13 you agree that Dr. Acquavella is discussing the AHS in 159:14 this document? 159:15 A. Yes.	
160:15 - 161:22	<b>Reeves, William 01-23-2019 (00:01:08)</b>	REEVES_WILLIAM_01-23-15
	160:15 Let's 160:16 go to the exposure assessment. 160:17 Do you see that? 160:18 A. I do see that. 160:19 Q. And you understand that one of the big 160:20 criticisms that our -- the plaintiff's experts have 160:21 raised with the AHS is specifically about exposure 160:22 misclassification. 160:23 Do you know that? 160:24 A. I do -- yes, I have heard that. 161:1 Q. Well, let's see what Dr. Acquavella has to 161:2 say. He says under exposure assessment, the exposure 161:3 assessment in the AHS will be inaccurate. 161:4 You see that? 161:5 A. I do see that. 161:6 Q. He doesn't say could be; right? 161:7 A. I understand -- seeing the words on the 161:8 page. 161:9 Q. He says will be inaccurate; right? 161:10 A. He used those words.	REEVES_WILLIAM_01-23-15

Page/Line	Source	ID
	161:11 Q. And that's what he said about the AHS 161:12 before he ever knew the results related to glyphosate, 161:13 or Roundup? 161:14 A. That's correct. 161:15 Q. And the next sentence reads inaccurate 161:16 exposure -- sorry, the next paragraph -- inaccurate 161:17 exposure classification can produce spurious results. 161:18 The conventional thinking in epidemiology is that 161:19 exposure misclassification will most often obscure 161:20 exposure disease relationships. 161:21 Do you see that? 161:22 A. I do see that.	Exhibit 1A.5
217:12 - 217:13	<b>Reeves, William 01-23-2019 (00:00:07)</b> 217:12 Q. I'm going to hand you the next document. 217:13 This is Exhibit 27?	REEVES_P000002_E010
218:2 - 218:12	<b>Reeves, William 01-23-2019 (00:00:15)</b> 218:2 Q. So you've seen this document before; 218:3 right? 218:4 A. Yes, I have. 218:5 Q. This is a document from the EPA; correct? 218:6 A. That is correct. 218:7 Q. And it's -- the date on here is March 4th, 218:8 1985; do you see that? 218:9 A. Yeah, stamped at the top. 218:10 Q. And it's titled consensus review of 218:11 glyphosate; right? 218:12 A. That is correct.	REEVES_P000002_E010 Exhibit 27
218:15 - 219:10	<b>Reeves, William 01-23-2019 (00:00:44)</b> 218:15 Q. It's a document that Monsanto has 218:16 considered in assessing its assessment of the safety of 218:17 glyphosate? 218:18 A. That's correct. 218:19 Q. It reads on February 11th, 1985, a group 218:20 of toxicology branch personnel met to evaluate and 218:21 discuss the database on glyphosate, and in particular 218:22 the potential oncogenic response of glyphosate. 218:23 Did I read that correctly. 218:24 A. That's correct. 219:1 Q. And then it says the following persons 219:2 were in attendance. Do you see that?	REEVES_P000002_E010 Exhibit 27

Page/Line	Source	ID
219:3	A. I do see that.	
219:4	Q. And there are -- one, two, three, four,	
219:5	five, six, seven -- eight people listed. Do you see	
219:6	that?	
219:7	A. I do see that.	
219:8	Q. And by my count, there's -- one, two,	
219:9	three, four, five -- six different PhDs. Is that	
219:10	right?	
219:11 - 220:23	<b>Reeves, William 01-23-2019 (00:01:12)</b>	
219:11	A. Six -- yes, that's correct.	
219:12	Q. And then there's a statistician in there?	
219:13	A. That's correct.	
219:14	Q. There's a DABT. Do you see that?	
219:15	A. Yes, I do.	
219:16	Q. What's a DABT?	
219:17	A. That's a diplomate of the American Board	
219:18	of Toxicology.	
219:19	Q. Is that a really fancy degree?	
219:20	A. It is a certification you can get for	
219:21	taking a test.	
219:22	Q. And that's specifically as it relates to	
219:23	toxicology?	
219:24	A. It's typically about -- it focuses on how	
220:1	toxicology studies are conducted.	
220:2	Q. Oh, okay. Well, that's appropriate.	
220:3	We're dealing here with a toxicology study; right?	
220:4	A. Yes, we are.	
220:5	Q. And then you see it's actually signed by	
220:6	every one of those people. Do you see it?	
220:7	A. Yes, I do see that.	
220:8	Q. And one of them was obviously Dr. Dykstra;	
220:9	right?	
220:10	A. That's right.	
220:11	Q. And it says right underneath all their	
220:12	signatures, the signatures above indicate concurrence	
220:13	with this consensus report; right?	
220:14	A. That's correct.	
220:15	Q. And if we turn to Section E in this	
220:16	report, there is a classification of glyphosate. Do	
220:17	you see that?	

Page/Line	Source	ID
220:18	A. I do see that.	
220:19	Q. And it reads in accordance with EPA	
220:20	proposed guidelines, the panel has classified	
220:21	glyphosate as a Category C oncogen.	
220:22	Do you see that?	
220:23	A. I do see that.	
222:4 - 222:5	<b>Reeves, William 01-23-2019 (00:00:06)</b>	REEVES_WILLIAM_01-23-2019 Q1-23-2019 00:00:06
222:4	Q. I'm giving you Exhibit 28. This is an	
222:5	internal Monsanto document.	
222:13 - 223:23	<b>Reeves, William 01-23-2019 (00:01:12)</b>	REEVES_WILLIAM_01-23-2019 Q1-23-2019 00:01:12
222:13	Q. So this is an internal Monsanto document.	
222:14	It's dated February 22nd, 1985; correct?	
222:15	A. Yes, that's correct.	
222:16	Q. So this is after that February 11th, 1985,	
222:17	consensus meeting; correct?	
222:18	A. That's correct.	
222:19	Q. And this was a document prepared in the	
222:20	regular course of Monsanto's business; correct?	
222:21	A. That's correct.	
222:22	Q. And it says right here regarding meeting	
222:23	February 21st, 1985. Do you see that?	
222:24	A. I do see that.	
223:1	Q. And it appears that there were different	
223:2	people who were present at that meeting; right?	
223:3	A. Yes, it lists a group of people.	
223:4	Q. And it looks like there was people from	
223:5	the EPA?	
223:6	A. That's correct.	
223:7	Q. And there were Monsanto employees;	
223:8	correct?	
223:9	A. That's correct.	
223:10	Q. And one person by the name of Fred	
223:11	Johannsen?	
223:12	A. Yes, I see that name.	
223:13	Q. And his initials would be F.J.; right?	
223:14	A. Yes, that's correct.	
223:15	Q. And in the document, it says the meeting	
223:16	mood was relaxed, informal, and open. The toxicology	
223:17	branch had decided on a course of action on February	
223:18	11th.	

Page/Line	Source	ID
223:19	Do you see that?	
223:20	A. I do see that.	
223:21	Q. That's referring specifically to that	
223:22	consensus document we just looked at?	
223:23	A. Yes.	
224:18 - 226:9	<b>Reeves, William 01-23-2019 (00:01:17)</b>	REEVES_WILLIAM_01-23-2019
224:18	Q. But anyway, if you turn the page, there is	REEVES_WILLIAM
224:19	a section that says concerns of toxicology branch.	REEVES_WILLIAM
224:20	Do you see that?	
224:21	A. Yes, I see that.	
224:22	Q. And it says Dr. Farber opened the meeting	REEVES_WILLIAM
224:23	by reciting the conclusions of the toxicology branch	REEVES_WILLIAM
224:24	internal peer review. Do you see that?	
225:1	A. I do see that.	
225:2	Q. And he says oncogenic in mouse, IARC	REEVES_WILLIAM
225:3	ranking C. Do you see that?	
225:4	A. I do see that.	
225:5	Q. Possible human carcinogen, one of the	REEVES_WILLIAM
225:6	weaker ones by that system. Do you see that?	
225:7	A. Yes, I do.	
225:8	Q. Company's letter was too weak to be	REEVES_WILLIAM
225:9	convincing. Did I read that right?	
225:10	A. Yes, you did.	
225:11	Q. Biologically significant rare tumors. Do	REEVES_WILLIAM
225:12	you see that?	
225:13	A. I do see that.	
225:14	Q. Statistically significant at an .05 level,	REEVES_WILLIAM
225:15	cited Tyrone at NTP. Do you see that?	
225:16	A. I do see that.	
225:17	Q. And NTP, that's the national toxicology	
225:18	program?	
225:19	A. That's correct.	
225:20	Q. Historical controls not helpful. Do you	REEVES_WILLIAM
225:21	see that?	
225:22	A. I do see that.	
225:23	Q. And then it says will ask to resection	REEVES_WILLIAM
225:24	tissues, consider crystal formation, et cetera; right?	
226:1	A. I do see that.	
226:2	Q. And then if we turn to the next page, Page	REEVES_WILLIAM
226:3	3. Are you there, sir?	

Page/Line	Source	ID
226:4 - 226:7	226:4 A. Yes, I am. 226:5 Q. And then starting in the second paragraph, 226:6 F.J. summarized Monsanto's position forcefully and 226:7 well.	REEVES_WILLIAM_0106
226:8 - 226:9	226:8 Do you see that? 226:9 A. I do see that.	REEVES_WILLIAM_0106
227:3 - 228:2	<b>Reeves, William 01-23-2019 (00:01:06)</b> 227:3 Q. So below that it says I asked 227:4 Dr. Farber if he had heard anything today that would 227:5 cause him to desire an additional meeting with Monsanto 227:6 scientists. He said no. 227:7 Do you see that? 227:8 A. I do see that. 227:9 Q. I asked if F.J. -- I asked F.J. if he had 227:10 detected any areas where we would obviously want to 227:11 come in quickly and discuss. He said no. 227:12 Do you see that? 227:13 A. I do see that. 227:14 Q. And if you go down, there is a paragraph 227:15 that reads F.J. do you see that? 227:16 A. There are a few. Can you go ahead? 227:17 Q. Yeah, just go down the paragraph that 227:18 begins F.J. asked. 227:19 A. Okay. 227:20 Q. It says F.J. asked, quote, short of a new 227:21 study or finding tumors in the control groups, what can 227:22 we do to get this thing off Group C? 227:23 Do you see that? 227:24 A. Just making sure I understand the full 228:1 context of what they're talking about here. All right. 228:2 Yes, I do see that.	REEVES_WILLIAM_0106
228:11 - 228:14	<b>Reeves, William 01-23-2019 (00:00:11)</b> 228:11 But it appears here that in a meeting with 228:12 the EPA, F.J. asked that short of finding a tumor in 228:13 the control group, what would get this thing off Group 228:14 C; correct.	REEVES_WILLIAM_0106
228:17 - 229:10	<b>Reeves, William 01-23-2019 (00:00:36)</b> 228:17 A. He also asked -- so the full statement is 228:18 short of a new study, so he's asking either a new study 228:19 or if there was something else in the control groups.	REEVES_WILLIAM_0106

Page/Line	Source	ID
	228:20 That's what he's saying here.	
	228:21 Q. (By Mr. Wisner) That's right. At this	
	228:22 point, the data from Bio/dynamics and the data that the	
	228:23 EPA reviewed didn't have any tumors in the control	
	228:24 group for the kidneys; right?	
	229:1 A. They did not, and there's a mention up	
	229:2 here of an agreement -- or a suggestion to relook at	
	229:3 tissues.	
	229:4 Q. Yeah, they're going to resection them;	
	229:5 right?	
	229:6 A. Resection, let's take a look.	
	229:7 Q. That's right. But as of -- I mean, he's	
	229:8 straight-up speculating, short of finding a new tumor,	
	229:9 what's going to get it off Group C? That's what he	
	229:10 says.	
229:13 - 229:14	<b>Reeves, William 01-23-2019 (00:00:02)</b>	REEVES_01-23-2019_0002
	229:13 A. That's not all that's there in that	
	229:14 statement.	
241:7 - 242:1	<b>Reeves, William 01-23-2019 (00:00:50)</b>	REEVES_01-23-2019_0050
	241:7 Q. (By Mr. Wisner) So following this study	
	241:8 and following that conversation that Monsanto had	
	241:9 with the EPA that we discussed earlier, Monsanto hired	
	241:10 a guy by the name of Dr. Marvin Kuschner; correct?	
	241:11 A. My understanding is that, yes, we did hire	
	241:12 Dr. Kuschner.	
	241:13 Q. What was the purpose of Monsanto hiring	
	241:14 him?	
	241:15 A. He was a pathologist.	
	241:16 Q. What did you want him to do?	
	241:17 A. A pathologist's job is to look at tissues	
	241:18 from animal studies to understand is there evidence	
	241:19 here of some disease outcome. Specifically Dr.	
	241:20 Kuschner looked at slides from this mouse study to	
	241:21 determine whether or not they were analyzed correctly	
	241:22 to begin with.	
	241:23 Q. And you would agree it would be highly	
	241:24 unscientific for him to have an opinion about what	
	242:1 those slides say before looking at them?	
242:4 - 242:13	<b>Reeves, William 01-23-2019 (00:00:15)</b>	REEVES_01-23-2019_0015
	242:4 A. Is there a document that you would like to	

Page/Line	Source	ID
242:5 discuss?		
242:6 Q. (By Mr. Wisner) I'm asking you an		
242:7 opinion. It has nothing to do with a document.		
242:8 A. I'm sorry, I can't guess at the answer to		
242:9 what you're asking about. If you have a document, I'd		
242:10 be happy to review it.		
242:11 MR. WISNER: Okay, I'm going to have him		
242:12 reask the question, and we'll see if you can answer it;		
242:13 okay.		
242:14 - 242:15 <b>Reeves, William 01-23-2019 (00:00:06)</b>		REEVES_DOWNSIZED_E030
242:14 [The pending question was read.		
242:15 by the reporter.]		
242:18 - 242:24 <b>Reeves, William 01-23-2019 (00:00:09)</b>		REEVES_DOWNSIZED_E030
242:18 A. So what I'm saying is if you have a		
242:19 document discussing Dr. Kuschner's views, I'd be happy		
242:20 to look at it.		
242:21 Q. (By Mr. Wisner) So you can't answer that		
242:22 question without seeing a document?		
242:23 A. I would like to see the document you're		
242:24 referring to.		
243:22 - 244:1 <b>Reeves, William 01-23-2019 (00:00:13)</b>		REEVES_DOWNSIZED_E030
243:22 So my question is this, sir. Is it		
243:23 Monsanto's opinion that it would be appropriate for Dr.		
243:24 Kuschner to have an opinion about those slides before		
244:1 seeing them.		
244:5 - 244:8 <b>Reeves, William 01-23-2019 (00:00:04)</b>		REEVES_DOWNSIZED_E030
244:5 A. If you have a document describing Dr.		
244:6 Kuschner's views, I'd be happy to look at it.		
244:7 Q. (By Mr. Wisner) So you can't answer that		
244:8 question?		
244:10 - 244:13 <b>Reeves, William 01-23-2019 (00:00:07)</b>		REEVES_DOWNSIZED_E030
244:10 A. Again, if you have a document describing		
244:11 Dr. Kuschner's views, I'd be happy to look at it.		
244:12 Q. (By Mr. Wisner) Sir, please answer my		
244:13 question. Can you answer the question or not?		
244:16 - 244:20 <b>Reeves, William 01-23-2019 (00:00:14)</b>		REEVES_DOWNSIZED_E030
244:16 A. I'd be happy to discuss any document you		
244:17 have describing Mr. -- Dr. Kuschner's views.		
244:18 MR. WISNER: Okay. So I'm just going to		
244:19 make a formal objection that this witness has not		

Page/Line	Source	ID
244:21 - 244:21	244:20 responded to my question. <b>Reeves, William 01-23-2019 (00:00:01)</b>	REEVES_WITNESS_01.WAV
246:3 - 246:12	244:21 Q. (By Mr. Wisner) Hand you Exhibit 30. <b>Reeves, William 01-23-2019 (00:00:11)</b> 246:3 Q. You recognize this document? 246:4 A. Yes, I do. 246:5 Q. Seen it before? 246:6 A. Yes, I have. 246:7 Q. This is an internal Monsanto document 246:8 dated April 3rd, 1985; correct? 246:9 A. That's correct. 246:10 Q. So this is after that meeting with the 246:11 EPA? 246:12 A. That's correct.	REEVES_WITNESS_01.WAV
248:4 - 248:6	<b>Reeves, William 01-23-2019 (00:00:05)</b> 248:4 Q. And this document was created in the 248:5 regular course of Monsanto's business; correct? 248:6 A. That's correct.	REEVES_WITNESS_01.WAV
248:11 - 249:4	<b>Reeves, William 01-23-2019 (00:00:41)</b> 248:11 Q. And it reads, starting in the second 248:12 paragraph, senior management at EPA is reviewing a 248:13 proposal to classify glyphosate as a Class C possible 248:14 human carcinogen because of kidney adenomas in male 248:15 mice. 248:16 Do you see that. 248:17 A. I do see that.	REEVES_WITNESS_01.WAV
248:18 - 248:22	248:18 Q. Dr. Marvin Kuschner will review kidney 248:19 sections and present his evaluation of them to the 248:20 EPA -- I'm sorry, to EPA in an effort to persuade the 248:21 agency that the observed tumors are not related to 248:22 glyphosate.	REEVES_WITNESS_01.WAV
248:23 - 248:24	248:23 Do you see that. 248:24 A. I do see that.	
249:1 - 249:4	249:1 Q. So as of April 3rd, 1985, Monsanto is 249:2 going to be hiring Dr. Kuschner is an effort to 249:3 persuade the agency that the tumors are not related to 249:4 glyphosate?	
249:7 - 249:15	<b>Reeves, William 01-23-2019 (00:00:29)</b> 249:7 A. Yeah, I can't really speak to what Dr. 249:8 George Levinskas had in mind when he hired Dr.	REEVES_WITNESS_01.WAV

Page/Line	Source	ID
249:9 - 250:15	249:9 Kuschner. His statement here is to T. F. Evans. I 249:10 don't know what his conversation was with Dr. Kuschner. 249:11 Q. (By Mr. Wisner) I mean, we could 249:12 speculate, or we could read what he says; right? He 249:13 straight-up says right here in an effort to persuade 249:14 the agency that the observed tumors are not related to 249:15 glyphosate. That's what it says; right?	REEVES_POWERSPEECH
249:18 - 250:1	<b>Reeves, William 01-23-2019 (00:00:13)</b>	REEVES_POWERSPEECH
249:18 - 250:24	249:18 A. Again, these are words from George 249:19 Levinskas to T. F. Evans. Nothing here tells me what 249:20 the conversation was with Dr. Kuschner. 249:21 Q. (By Mr. Wisner) So that's April 3rd, 249:22 1985; right? 249:23 A. That's correct. 249:24 Q. I'm handing you Exhibit 31.	REEVES_POWERSPEECH
250:1 - 251:4	250:1 [Exhibit 31 marked for identification.] <b>Reeves, William 01-23-2019 (00:01:11)</b>	REEVES_POWERSPEECH
250:2 - 251:24	250:2 Q. Have you seen this document before, sir? 250:3 A. Yes, I have. 250:4 Q. This is a document dated April 3rd, 1985; 250:5 right? 250:6 A. That's correct. 250:7 Q. Same date as the document we just looked 250:8 at? 250:9 A. That's correct. 250:10 Q. And it's a letter addressed to Dr. Marvin 250:11 Kuschner; correct? 250:12 A. Just make sure. It is directed -- it is 250:13 addressed to Dr. Kuschner. 250:14 Q. And it's from someone at the Bio/dynamics 250:15 lab? 250:16 A. Yeah, this is Knezevich, so this is one of 250:17 the authors, I believe, of the mouse study. 250:18 Q. And he says he's sending slides to -- God 250:19 bless you. He says here that he's sending slides to 250:20 Dr. Kuschner at the request of Dr. Long of Monsanto; 250:21 right? 250:22 A. That's correct. 250:23 Q. If you have any questions concerning the 250:24 shipment, please do not hesitate to contact me.	REEVES_POWERSPEECH

Page/Line	Source	ID
251:1 - 251:21	251:1 Do you see that. 251:2 A. Yes. He also acknowledges that he -- it 251:3 contains slides of all kidney sections from all animals 251:4 in the reference study.	REEVES_HORNBECK_03.41
251:14 - 251:21	<b>Reeves, William 01-23-2019 (00:00:28)</b> 251:14 Q. So if we compare the dates of the letter 251:15 from Exhibit 30 and -- sorry -- the letter, which is 251:16 Exhibit 31, with the memo from Monsanto, it appears 251:17 that on the very date that Mr. Levinskas is saying that 251:18 they're going to have Dr. Marvin Kuschner help them 251:19 persuade the agency that the observed tumors are 251:20 not related to glyphosate, they're actually sending the 251:21 slides to Dr. Kuschner?	REEVES_HORNBECK_03.41
251:24 - 252:7	<b>Reeves, William 01-23-2019 (00:00:21)</b> 251:24 A. So the date of the letter from George 252:1 Levinskas to T. F. Evans is the same as the date of the 252:2 letter from Bio/dynamics to Dr. Kuschner. 252:3 Q. (By Mr. Wisner) So unless George 252:4 "Kevinskas" somehow could see into the future, how 252:5 could he possibly know that Dr. Kuschner would help 252:6 them persuade the agency that the tumors were not 252:7 related to the glyphosate?	REEVES_HORNBECK_03.42
252:10 - 253:21	<b>Reeves, William 01-23-2019 (00:01:19)</b> 252:10 A. I can't guess as to what was in George 252:11 Levinskas's thoughts at that time. 252:12 Q. (By Mr. Wisner) Beyond what he wrote? 252:13 A. Yeah, all we have is what he wrote. We 252:14 don't know that that's the conversation he had with Dr. 252:15 Knezevich or Dr. Kuschner. 252:16 Q. And if we look right here, at the back of 252:17 it is a laboratory receipt. You see that? 252:18 A. Yes, I do see that. 252:19 Q. And we have a sign -- it's signed by 252:20 Marvin Kuschner? 252:21 A. Yes. 252:22 Q. And it's actually on April 14th, 1985; 252:23 right? 252:24 A. That's correct. 253:1 Q. It's 11 days after the memo by Mr. 253:2 Levinskas?	REEVES_HORNBECK_03.43

Page/Line	Source	ID
253:3 - 253:18	253:3 A. Yes, that's correct. 253:4 Q. So subsequent to this, Dr. Kuschner 253:5 reviewed the kidney tumor slides; right? 253:6 A. Yes, that is correct. 253:7 Q. And he -- 253:8 A. He actually looked at slides from all the 253:9 kidneys -- 253:10 Q. That's right. 253:11 A. -- just to understand if they were any. 253:12 Q. And he discovered a tumor in the control 253:13 group; correct? 253:14 A. In addition to some others, yes. 253:15 Q. And Monsanto then had him prepare a 253:16 report, and they submitted that report to the EPA; 253:17 correct? 253:18 A. Yes. And that report showed the 253:19 additional tumor in the control groups as well as some 253:20 additional tumors that he found in the treated groups 253:21 as well.	
254:20 - 254:20	<b>Reeves, William 01-23-2019 (00:00:02)</b>	REEVES_WILLIAM_01-23-2019_00:00:02
254:21 - 255:4	254:20 Q. I'm handing you Exhibit 32 to your <b>Reeves, William 01-23-2019 (00:00:16)</b> 254:21 deposition, sir. Have you seen this document before? 254:22 A. Yes, I have. 254:23 Q. This is an internal Monsanto memorandum; 254:24 correct? 255:1 A. Yes, it is. 255:2 Q. Provided -- prepared by or signed by Mr. 255:3 Gingerich? 255:4 A. Yes, Lyle Gingerich.	REEVES_WILLIAM_01-23-2019_00:00:16
255:7 - 256:6	<b>Reeves, William 01-23-2019 (00:00:51)</b> 255:7 He was the same person who prepared the 255:8 memo regarding the EPA's meeting with Monsanto. 255:9 A. That's correct. 255:10 Q. This is dated August 20th, 1985. Do you 255:11 see that? 255:12 A. Yes, I see that. 255:13 Q. And the first sentence of this memo reads 255:14 if the results of the kidney resectioning do not 255:15 resolve the glyphosate issue with an OPP, we will be	REEVES_WILLIAM_01-23-2019_00:00:51

Page/Line	Source	ID
	255:16 faced with an adverse OPP decision. 255:17 Do you see that. 255:18 A. I do see that. 255:19 Q. And OPP is a division within EPA that 255:20 stands for office of pesticide programs; correct? 255:21 A. That's correct. 255:22 Q. It is likely that OPP will ask the SAP for 255:23 concurrence in this determination that there is a 255:24 treatment-related effect in the glyphosate mouse study. 256:1 Do you see that. 256:2 A. I do see that. 256:3 Q. And the SAP is a scientific advisory 256:4 panel; right? 256:5 A. That is my understanding of how they use 256:6 that term.	REEDER_INWITNESS_03.WAV
256:12 - 256:15	<b>Reeves, William 01-23-2019 (00:00:06)</b> 256:12 The SAP is a group of scientists that 256:13 review things for the EPA. 256:14 A. That's right, who don't work for the 256:15 agency.	REEDER_INWITNESS_03.WAV
257:21 - 258:1	<b>Reeves, William 01-23-2019 (00:00:10)</b> 257:21 Q. In any event, Mr. Gingerich is talking 257:22 about changing the focus of the SAP to that question; 257:23 correct? 257:24 A. That is the question that Mr. Gingerich is 258:1 asking in this letter.	REEDER_INWITNESS_03.WAV
258:8 - 259:1	<b>Reeves, William 01-23-2019 (00:00:46)</b> 258:8 Q. And he goes, if so, I recommend we bring 258:9 all 10 of the toxicologists to the SAP meeting. There 258:10 is a tendency to, quote, count the votes, end quote, at 258:11 SAP meetings. We can make a difference by lining up a 258:12 large number of experts on our side. 258:13 Do you think -- you see that. 258:14 A. I do see that. 258:15 Q. And then it goes on, Dr. Moore and Dr. 258:16 Farber may be misreading the consensus of their 258:17 professional colleagues on this issue. With the 258:18 importance of this decision to Monsanto, I don't think 258:19 we can leave any doubts in the minds of the EPA or SAP 258:20 of what the consensus of the professional toxicologists	REEDER_INWITNESS_03.WAV

Page/Line	Source	ID
	258:21 is on this issue.	
	258:22 Do you see that.	
	258:23 A. I do see that.	
	258:24 Q. So this appears to be a strategy to line	
	259:1 up a series of experts to appear at the SAP; correct?	
259:4 - 259:8	<b>Reeves, William 01-23-2019 (00:00:16)</b>	REEVES_Download_E01.E01
	259:4 A. What he does is he starts -- Lyle	REEVES_Download_E01.E01
	259:5 Gingerich has set up this question of are there 10	REEVES_Download_E01.E01
	259:6 respected toxicologists who agree with us, and then he	REEVES_Download_E01.E01
	259:7 goes on to speculate about what you could do if you had	REEVES_Download_E01.E01
	259:8 such a group, and so that's really all he's doing.	REEVES_Download_E01.E01
259:22 - 260:2	<b>Reeves, William 01-23-2019 (00:00:15)</b>	REEVES_Download_E01.E01
	259:22 Monsanto believed at this time that it was	REEVES_Download_E01.E01
	259:23 important to identify and contact these potential	REEVES_Download_E01.E01
	259:24 experts and make sure that they could testify on behalf	REEVES_Download_E01.E01
	260:1 of Monsanto at the EPA and at the SAP to say that	REEVES_Download_E01.E01
	260:2 glyphosate's not oncogenic; correct.	REEVES_Download_E01.E01
260:5 - 260:7	<b>Reeves, William 01-23-2019 (00:00:08)</b>	REEVES_Download_E01.E01
	260:5 A. Yeah, I would be guessing as to whether or	REEVES_Download_E01.E01
	260:6 not Monsanto at this time shared the opinion of Dr.	REEVES_Download_E01.E01
	260:7 Gingerich. He's expressing his own views here.	REEVES_Download_E01.E01
263:1 - 263:3	<b>Reeves, William 01-23-2019 (00:00:06)</b>	REEVES_Download_E01.E01
	263:1 Q. (By Mr. Wisner) Just handed you Exhibit	REEVES_Download_E01.E01
	263:2 33. Please let me know when you feel free you can talk	REEVES_Download_E01.E01
	263:3 about it.	REEVES_Download_E01.E01
263:4 - 264:6	<b>Reeves, William 01-23-2019 (00:00:53)</b>	REEVES_Download_E01.E01
	263:4 [Exhibit 33 marked for identification.]	REEVES_Download_E01.E01
	263:5 A. All right.	REEVES_Download_E01.E01
	263:6 Q. You had a chance to review it?	REEVES_Download_E01.E01
	263:7 A. Yes, I have.	REEVES_Download_E01.E01
	263:8 Q. So this is an internal Monsanto document;	REEVES_Download_E01.E01
	263:9 correct?	REEVES_Download_E01.E01
	263:10 A. That's correct.	REEVES_Download_E01.E01
	263:11 Q. It's dated August 28th, 1985?	REEVES_Download_E01.E01
	263:12 A. That's correct.	REEVES_Download_E01.E01
	263:13 Q. Six days after the last document we saw?	REEVES_Download_E01.E01
	263:14 A. That's correct.	REEVES_Download_E01.E01
	263:15 Q. And this was a document that was prepared	REEVES_Download_E01.E01
	263:16 in Monsanto's regular and ordinary course of business?	REEVES_Download_E01.E01
	263:17 A. That's correct.	REEVES_Download_E01.E01

Page/Line	Source	ID
263:18	Q. And it appears, if you look at the back,	REEVES_01-23-2019_00:02:04
263:19	to be written by a person named Frank Serdy?	
263:20	A. Yes, that's correct.	
263:21	Q. Do you recall who Frank Serdy was?	
263:22	A. My understanding is that Frank Serdy was	
263:23	in our toxicology group.	
263:24	Q. And he's writing to Tim Long. Do you see	
264:1	that?	
264:2	A. Or act -- you know what, I believe he may	
264:3	have been in government affairs. So we'd have to -- we	
264:4	could double-check on that.	
264:5	Q. Well, he worked at Monsanto; right?	
264:6	A. He was a Monsanto employee, yes.	
264:9 - 266:11	<b>Reeves, William 01-23-2019 (00:02:04)</b>	REEVES_01-23-2019_00:02:04
264:9	Q. And he writes the news you relayed to us	REEVES_01-23-2019_00:02:04
264:10	264:10 on the preliminary results of the resections was very	
264:11	encouraging. We continue to believe that the result of	
264:12	264:12 all of these effort will be that glyphosate is not	
264:13	shown to be oncogenic.	
264:14	264:14 Do you see that.	
264:15	A. That's correct.	
264:16	Q. And then he goes on, we now feel it is	
264:17	264:17 important to begin to make plans and begin to prepare	
264:18	264:18 our strategy on how we will both submit the results and	
264:19	264:19 respond if the EPA does not accept our results.	
264:20	264:20 Do you see that.	
264:21	A. I do see that.	
264:22	Q. We ask your cooperation with the	
264:23	264:23 following, colon. Do you see that, sir?	
264:24	A. I do see that.	
265:1	Q. So it appears that he's going to discuss	
265:2	265:2 Monsanto's plans and strategies; right?	
265:3	A. He says it's to begin to make -- it is	
265:4	265:4 important to begin to make plans, begin to prepare our	
265:5	265:5 strategy.	
265:6	Q. So he's talking about plans and strategy;	
265:7	265:7 right?	
265:8	A. Yes, he is talking about plans and	
265:9	265:9 strategies.	
265:10	Q. Number 1, we continue to feel it is	

Page/Line	Source	ID
265:11	important to identify and contact those outside, quote,	
265:12	experts, unquote, who we feel would testify on our	
265:13	behalf both to EPA and SAP that, based on the results,	
265:14	glyphosate is not oncogenic.	
265:15	Do you see that.	
265:16	A. Yes, I do.	
265:17	Q. And then Number 2, we do not have a lot of	REEDER-001128
265:18	faith that, presented with the same evidence, Ted	
265:19	Farber will want to back off and change his mind.	
265:20	Did I read that right.	
265:21	A. That is correct.	
265:22	Q. Ted Farber, he was the head of the OPP at	
265:23	the EPA; correct?	
265:24	A. I'd have to go back and check. He was --	
266:1	I know he was with the EPA.	
266:2	Q. He was somebody with the EPA?	
266:3	A. He was with the EPA.	
266:4	Q. Hence we feel that it is equally as	REEDER-001129
266:5	important to identify and contact, quote, experts,	
266:6	unquote, in the area of statistics who would be willing	
266:7	to testify both to the EPA and SAP that 1-0-1-3 cannot	
266:8	be considered significant. Also we will need opinions	
266:9	on the proper way to handle historical controls.	
266:10	Do you see that.	
266:11	A. I do see that.	
269:11 - 270:3	<b>Reeves, William 01-23-2019 (00:00:38)</b>	REEDER-001130
269:11	Q. (By Mr. Wisner) All right, Doctor, I've	
269:12	handed you a document, Exhibit 34 to your deposition.	
269:13	Do you recognize this document?	
269:14	[Exhibit 34 marked for identification.]	
269:15	A. Yes, I do.	
269:16	Q. This is a document. It's been produced by	REEDER-001131
269:17	Monsanto in this litigation, and it's in a memo from	
269:18	the Environmental Protection Agency. Do you see that?	
269:19	A. I do see that.	
269:20	Q. And it's dated December 12th, 1985; right?	
269:21	A. That's correct.	
269:22	Q. So this is after those internal memos that	
269:23	we reviewed from Monsanto; correct?	
269:24	A. Yes.	

Page/Line	Source	ID
	270:1 Q. And as you can see, it is from William 270:2 Dykstra, a PhD at the EPA? 270:3 A. That's correct.	
270:10 - 274:5	<b>Reeves, William 01-23-2019 (00:03:40)</b>	REEVES_WILLIAM_01-23-2019
	270:10 Q. And this was a document that Monsanto had 270:11 obviously reviewed and considered as part of its 270:12 understanding of the regulatory history of Roundup? 270:13 A. That's correct. 270:14 Q. Background. Glyphosate was considered 270:15 oncogenic in male mice, causing renal tubule adenomas, 270:16 a rare tumor, in a dose-related manner. The incidence 270:17 of this tumor was zero, zero, one, and three in the 270:18 control, low-, mid-, and high-dose groups respectively. 270:19 Do you see that? 270:20 A. Yes, I do. 270:21 Q. And this is what this is referring to -- 270:22 is typically in these sort of animal carcinogenicity 270:23 studies, there are four separate groups; right? 270:24 A. Yes, that's typical. 271:1 Q. The first group is the control group; 271:2 right? 271:3 A. That's right. 271:4 Q. They don't get exposed to the chemical? 271:5 A. That's right. 271:6 Q. And then you have a low-dose, a mid-dose, 271:7 and a high-dose group; right? 271:8 A. That's correct. 271:9 Q. And one of the things you're looking at 271:10 is, because it's in a laboratory, everything is highly 271:11 controlled -- you use that control to sort of compare 271:12 the rodents that are exposed to the chemical to the 271:13 ones that are not; right? 271:14 A. That's correct. 271:15 Q. And this reference to zero, zero, one, 271:16 three, that's referring to the incidence of the kidney 271:17 tumors that we were discussing in the original review? 271:18 A. That's correct. 271:19 Q. And it goes on. Additional evaluation of 271:20 all original renal sections identified a small renal 271:21 tubular in one control male, Animal Number 1028, which	REEVES_WILLIAM_01-23-2019

Page/Line	Source	ID
271:22	was not diagnosed as such in the original pathology	
271:23	report.	
271:24	Do you see that?	
272:1	A. Yes, I do.	
272:2	Q. Subsequently -- sorry -- so it's talking	
272:3	about the identification of this new tumor in -- sorry,	
272:4	I shouldn't say new tumor. I'm not trying to	
272:5	suggest -- so what he's saying here is they've	
272:6	identified a potential tumor in the control group;	
272:7	correct?	
272:8	A. Yes, that they have -- essentially when	
272:9	they went back, they looked at the control animals,	
272:10	looked at their kidneys, they found an additional tumor	
272:11	there that they had not noticed previously.	
272:12	Q. Goes on, subsequently, toxicology	
272:13	branch recommended that additional renal sections be	
272:14	cut and evaluated from all control in	
272:15	glyphosate-treated male mice. See that?	
272:16	A. Yes, I do.	
272:17	Q. And so that's your understanding? The EPA	
272:18	went back and recut all of the tissues in the kidneys	
272:19	for the male mice.	
272:20	A. They made that actually a requirement for	
272:21	Monsanto. So we had the laboratory -- let's resection	
272:22	these tissues and then have a pathology working group	
272:23	take a look at them.	
272:24	Q. This review contains the evaluation of the	
273:1	submitted results of the additional sectioning in	
273:2	pathological data. See that?	
273:3	A. I do see that.	
273:4	Q. On the second page is the conclusion. Do	
273:5	you see that?	
273:6	A. Yes, I do see that.	
273:7	Q. The results of the additional pathological	
273:8	evaluation on recut kidney sections in male mice	
273:9	demonstrated no additional tumors were present. Do you	
273:10	see that?	
273:11	A. I do see that.	
273:12	Q. And then if you go down, you see the	
273:13	actual review section of his document. You see that?	

Page/Line	Source	ID
	273:14 A. I do see that.	
	273:15 Q. And again, it reflects zero in the	
	273:16 control, zero in the low dose, one in the mid dose, and	
	273:17 three in the high dose; correct?	
	273:18 A. I do see that.	
	273:19 Q. And then it goes, the additional tumor in	
	273:20 the control group, which had been diagnosed from the	
	273:21 reevaluation of the original slides, was not present in	
	273:22 the recut kidney sections. Do you see that?	
	273:23 A. I do see that statement.	
	273:24 Q. So they went back and they recut it and	
	274:1 they didn't see this tumor in the control group?	
	274:2 A. That's right. So this is prior to the	
	274:3 path -- the -- yeah, the independent pathology working	
	274:4 group, who looked at the slides without any information	
	274:5 about which one was which.	
274:6 - 274:8	<b>Reeves, William 01-23-2019 (00:00:05)</b>	
	274:6 Q. So as Monsanto predicted, there was in	
	274:7 fact a scientific advisory panel convened; correct?	
	274:8 A. Yes. And this was following the discovery	
274:9 - 274:10	<b>Reeves, William 01-23-2019 (00:00:06)</b>	
	274:9 by the pathology working group, and their conclusion	
	274:10 that indeed these tumors were there.	
275:4 - 275:19	<b>Reeves, William 01-23-2019 (00:00:40)</b>	
	275:4 Q. And just for the jury's understanding, a	
	275:5 scientific advisory panel -- what happened there was	
	275:6 various people testified about this issue related to	
	275:7 the mouse study?	
	275:8 A. So I can speak to generally at a science	
	275:9 advisory panel, EPA brings independent scientists in,	
	275:10 they want them to essentially conduct a peer review of	
	275:11 the agency's work and then provide feedback on what	
	275:12 needs improvement, clarification, anything like that.	
	275:13 Q. Exactly. And at this meeting, Monsanto	
	275:14 sends people to represent its interests; right?	
	275:15 A. Yes. Anyone they send -- anyone may go	
	275:16 and comment publicly.	
	275:17 Q. Exactly. And then the EPA sends	
	275:18 scientists as well to testify?	
	275:19 A. That's correct.	

Page/Line	Source	ID
283:6 - 283:16	<b>Reeves, William 01-23-2019 (00:00:18)</b> 283:6 Q. This is a guidance document for 283:7 glyphosate; right? 283:8 A. Yes. 283:9 Q. From the EPA? 283:10 A. That is correct. 283:11 Q. Dated June 1986; right? 283:12 A. That's correct. 283:13 Q. Just about five months after the SAP 283:14 meeting? 283:15 A. Let me just make sure of the date. About 283:16 four months.	REEVES_01-23-2019 Exhibit 914.1A.1
285:4 - 285:4	<b>Reeves, William 01-23-2019 (00:00:01)</b> 285:4 Q. Turn to Page 6. You there?	REEVES_01-23-2019 Exhibit 914.1A.1
285:5 - 288:4	<b>Reeves, William 01-23-2019 (00:02:44)</b> 285:5 A. Yes, I am. 285:6 Q. And this is describing the mouse study; 285:7 right? 285:8 A. At the very top? 285:9 Q. Yeah. The first paragraph. 285:10 A. Yes. 285:11 Q. It goes on. It says the chronic 285:12 feeding/oncogenicity study in mice tested dosages of 285:13 1,000, 5,000, and 30,000 parts per million. Glyphosate 285:14 produced an equivocal oncogenic response in the mouse, 285:15 causing a slight increase in the incidence of renal 285:16 tubular adenomas -- benign tumor in the kidney -- in 285:17 males at the highest dose treated of 30,000 PPM. See 285:18 that? 285:19 A. Yes, I do. 285:20 Q. Toxicology branch ad hoc oncogenicity 285:21 committee tentatively classified glyphosate as a Class 285:22 C oncogen. See that? 285:23 A. I do see that. 285:24 Q. The studies were reexamined by a 286:1 consulting pathologist and data were submitted 286:2 indicating that an additional kidney tumor had been 286:3 found in the control males. No renal tumors were found 286:4 in controls in the original examination. You see that? 286:5 A. Yes, I do.	REEVES_01-23-2019 Exhibit 914.1A.2

Page/Line	Source	ID
286:6	Q. And that consulting pathologist was Dr.	
286:7	Kuschner; right?	
286:8	A. Yes.	
286:9	Q. The agency then requested that additional	REB00070414.002
286:10	kidney sections from the mouse study be prepared and	
286:11	examined. You agree with that; right?	
286:12	A. I do see that, yes.	
286:13	Q. The resultant microslides were examined by	
286:14	a number of pathologists. Those examinations revealed	
286:15	no additional tumors, but confirmed the presence of the	
286:16	tumors identified in the original study report.	
286:17	Do you see that?	
286:18	A. I do see that.	
286:19	Q. The apparent lesion in the control kidney	REB00070414.002
286:20	was not present in any of the additional sections.	
286:21	After examination of the slides, the agency concluded	
286:22	that this lesion did not represent a pathologically	
286:23	significant change.	
286:24	Do you see that?	
287:1	A. I do see that.	
287:2	Q. So that was the agency's conclusion about	
287:3	this tumor in the control slide?	
287:4	A. Yeah, this is their account of the	
287:5	historical information regarding that.	
287:6	Q. So then it goes on in the bottom paragraph	REB00070414.002
287:7	specifically discussing the SAP. Do you see that?	
287:8	A. I do see that.	
287:9	Q. And if you turn to the next page, this is	REB00070414.002
287:10	what I wanted to get at. Let me know when you're	
287:11	ready.	
287:12	A. Yes, I am.	
287:13	Q. It reads, after consideration of the	REB00070414.002
287:14	expert opinion of the SAP and reconsideration of all	
287:15	relevant data for this compound, in particular the	
287:16	statistical assessment provided by the SAP, the agency	
287:17	agrees that available data are not sufficient to	
287:18	adequately address the question of whether the apparent	
287:19	effects noted in the mouse study are biologically	
287:20	relevant. Therefore, in order to fully address this	
287:21	question, the agency is requiring that this study be	

Page/Line	Source	ID
	287:22 repeated with a larger number of animals in each test 287:23 group so that the statistical power of the study is 287:24 increased. 288:1 Do you see that? 288:2 A. I do see that. 288:3 Q. So the agency did in fact require an 288:4 additional study?	
288:7 - 288:8	<b>Reeves, William 01-23-2019 (00:00:02)</b>	REEVES_POWERPOINT_01.PPT
	288:7 A. So what they're saying is the agency is 288:8 requiring.	
288:10 - 288:17	<b>Reeves, William 01-23-2019 (00:00:20)</b>	REEVES_POWERPOINT_01.PPT
	288:10 A. Well, it would come in the forms -- so 288:11 earlier on this document discusses data call-in, so 288:12 that's the mechanism by which they would do it. This 288:13 could be -- this document would be recounting perhaps 288:14 conversations that the agency has had, but it's the 288:15 official data call-in authority that the agency uses to 288:16 say submit a study. So that would be a separate 288:17 document.	
289:13 - 289:14	<b>Reeves, William 01-23-2019 (00:00:03)</b>	REEVES_POWERPOINT_01.PPT
	289:13 Q. I'm handing you a document, Exhibit 37 to 289:14 your deposition.	
289:20 - 291:12	<b>Reeves, William 01-23-2019 (00:01:23)</b>	REEVES_POWERPOINT_01.PPT
	289:20 Q. So you've seen this document before? 289:21 A. Yes, I have. 289:22 Q. This is an internal Monsanto memo; 289:23 correct? 289:24 A. That is correct. 290:1 Q. And it's dated August 28th, 1986? 290:2 A. That's correct. 290:3 Q. Month or so after the registration 290:4 document? 290:5 A. About two months. 290:6 Q. And it -- I mean, it says subject, 290:7 glyphosate registration standard. Do you see that? 290:8 A. I do see that. 290:9 Q. And this was written by Timothy Long. Do 290:10 you see that? 290:11 A. Yes, I see T. J. Long as he signed it -- 290:12 Timothy J., yes.	EXHIBIT 37A 1-1 EXHIBIT 37A 1-2

Page/Line	Source	ID
290:13 - 290:20	<p>Q. And this was a document made in the regular course of Monsanto's business; right?</p> <p>A. That's correct.</p> <p>He writes, after reviewing the referenced document, I would like to make the following suggestions for our response to the requirements for additional testing. Do you see that?</p>	EXHIBIT 313.12
290:21 - 290:23	<p>Q. And the first section is rat and mouse oncogenicity studies. See that?</p> <p>A. Yes, I do.</p>	EXHIBIT 313.14
290:24 - 291:2	<p>Q. And it says several approaches could be taken; right?</p> <p>A. That's correct.</p>	EXHIBIT 313.14
291:3 - 291:7	<p>Q. First approach is, present arguments for not repeating either study based on the principles discussed in the agency's MTD position paper, attachment one. See that?</p> <p>A. Yes, I do.</p>	EXHIBIT 313.14
291:8 - 291:11	<p>Q. Option 2, agree to repeat the rat study and vehemently argue the lack of justification for a repeat mouse study. See that?</p> <p>A. I do see that.</p>	EXHIBIT 313.14
291:12 - 291:17	<p>Q. And then Option 3 -- it's on the third page. You see that?</p>	EXHIBIT 313.14
291:13 - 291:17	<p><b>Reeves, William 01-23-2019 (00:00:08)</b></p>	REVIEWER_313.14
291:13 - 291:17	<p>A. Yes, I do.</p>	REVIEWER_313.14
291:15 - 291:17	<p>Q. Repeat only the mouse study and only to a maximum dosage level of 7,000 PPM. You see that?</p>	REVIEWER_313.14
291:17	<p>A. I do see that.</p>	REVIEWER_313.14
292:6 - 293:4	<p><b>Reeves, William 01-23-2019 (00:01:02)</b></p>	REVIEWER_313.14
292:6 - 292:8	<p>7,000 PPM is less than a third of what the Knezevich and Hogan study had; correct?</p>	REVIEWER_313.14
292:9 - 292:11	<p>A. That is correct, but I think it's important to have that context of they're saying this is already wildly above any human exposure.</p>	REVIEWER_313.14
292:12 - 292:14	<p>Q. Number 4, as a final fallback position if necessary, we could agree to repeat the oncogenic rat study as discussed in Point 2 above and agree to a</p>	REVIEWER_313.14

Page/Line	Source	ID
	292:15 partial mouse oncogenicity repeat. Do you see that? 292:16 A. I do see that. 292:17 Q. Last sentence, I feel this should be the 292:18 last and least desirable position that we should take 292:19 on the issue of repeat studies. Do you see that? 292:20 A. I do see that. And he provides the 292:21 context in the middle. 292:22 Q. So he's discussing all these potential 292:23 options that Monsanto can take regarding 292:24 the requirement that Monsanto do another rat and mouse 293:1 study; right? 293:2 A. They're providing a series of options we 293:3 have to provide additional data to make sure EPA has an 293:4 accurate assessment of this molecule.	REEFER-PRO-04
742:15 - 743:9	<b>Reeves, William 01-24-2019 (00:00:35)</b>  742:15 Q. Okay. Let me -- let's -- we'll come 742:16 back to some other issues about Roundup and its 742:17 safety in a little while but I want to get into a 742:18 little of your personal background. 742:19 A. Okay. 742:20 Q. Let's start with your education. 742:21 Where did you go to college? 742:22 A. At the University of Missouri. 742:23 Q. What was your degree in at the 742:24 University of Missouri? 742:25 A. It was a Bachelor's of Science in 743:1 biology. 743:2 Q. Did you get a -- a subsequent degree? 743:3 A. Yes, I did. 743:4 Q. What was the subsequent degree? 743:5 A. That was a PhD in toxicology from 743:6 Texas A&M University. 743:7 Q. Did you get the -- your PhD in 743:8 toxicology in 2000? 743:9 A. I did.	REEFER-PRO-05
744:17 - 750:24	<b>Reeves, William 01-24-2019 (00:06:35)</b>  744:17 Q. (BY MR. BRENZA) What was the next 744:18 job you had? 744:19 A. Following that, I worked for the 744:20 University of Missouri, and that was as an	REEFER-PRO-06

Page/Line	Source	ID
744:21	environmental health technician.	
744:22	Q. And was that in -- from 1995 to 1996?	
744:23	A. That's correct.	
744:24	Q. What did you do as an environmental	
744:25	health technician at the University of Missouri?	
745:1	A. I -- I had two parts to that role.	
745:2	One was doing fire and safety inspections in	
745:3	laboratories, and then the other one was hazardous	
745:4	materials management. And so that was any kind of	
745:5	hazardous material that laboratories or farms would	
745:6	have and we would help them make sure it was being	
745:7	handled appropriately.	
745:8	Q. What was the next job you had?	
745:9	A. Following that I was a research -- a	
745:10	graduate research associate at Texas A&M University	
745:11	as part of going to graduate school there.	
745:12	Q. So that was from 1996 to about 2000?	
745:13	A. That's correct.	
745:14	Q. What did you do as a graduate	
745:15	research assistant at Texas A&M University?	
745:16	A. So mainly what you're doing in those	
745:17	roles is conducting research, you know, that earns	
745:18	you your PhD, and so I had two aspects of my	
745:19	research. We were trying to understand could there	
745:20	be refinements to risk assessments for -- for	
745:21	contaminated sites, specifically sites contaminated	
745:22	with petroleum products. Would there be any way to	
745:23	understand which sites needed clean up the most.	
745:24	You know, right now, and at that	
745:25	time, it was analytical data. Say you have this	
746:1	many contaminants of this type, the one with the	
746:2	most has the most priority.	
746:3	We were trying to understand is there	
746:4	a better way to score that, you know, are these	
746:5	materials binding to soil. You know, these are	
746:6	present as a mixture. Is there something about	
746:7	those mixtures that we could understand that would	
746:8	help say this one is more important than that one.	
746:9	Q. So you mentioned mixtures. Was part	
746:10	of your job there to evaluate the behavior of	

Page/Line	Source	ID
746:11	mixtures in a toxicological way?	
746:12	A. Yes, it was.	
746:13	Q. Did you reach conclusions about the	
746:14	hydrocarbon mixtures that you were working with,	
746:15	about how they behaved as mixtures?	
746:16	A. Yes, we did. So the conclusion was	
746:17	that the -- what we were doing was separating them	
746:18	out, you know, so there were components of these	
746:19	mixtures, certain chemicals that are alike, they're	
746:20	part of the same class.	
746:21	We would separate those and then do	
746:22	studies with them to understand, do the activities	
746:23	of the individual mixture components predict	
746:24	overall mixture toxicity. And our conclusion was	
746:25	yes, they did.	
747:1	Q. Did you reach conclusions generally	
747:2	about the toxicological properties of mixed	
747:3	compounds as a result of your work?	
747:4	A. Yes, my -- my hope was that I'd be	
747:5	able to find that there was some sort of	
747:6	interaction that we didn't know about that needed	
747:7	to be accounted for, but I did not. And one of the	
747:8	things I learned as part of that is such	
747:9	interactions are rare.	
747:10	Q. And when you say "such interactions	
747:11	are rare," what does that tell you about how	
747:12	mixtures or formulations behave relative to their	
747:13	components?	
747:14	A. So based on our understanding of that	
747:15	and other information from the scientific	
747:16	literature, it -- it tells us that, you know,	
747:17	generally speaking, when I have two substances or	
747:18	more substances where I know about how they behave	
747:19	in the body, that is going to be predictive of how	
747:20	the mixture itself behaves overall in the body.	
747:21	Q. What was the next position you worked	
747:22	in?	
747:23	A. After that I was a postdoctoral	
747:24	researcher at the University of California at	
747:25	Davis.	

Page/Line	Source	ID
748:1	Q. And what did you do there?	
748:2	A. At -- at UC Davis I was a -- I was	
748:3	working with the entomology department and the	
748:4	toxicology department. The idea was we wanted to	
748:5	be able to determine the amino acid sequence of	
748:6	very small amounts of protein.	
748:7	We have -- we had the, at that time,	
748:8	we had the ability to isolate small proteins, you	
748:9	know, ones that are being used in signaling, that	
748:10	are only present for a short period of time in the	
748:11	cell, and the idea was if you could isolate those	
748:12	and then sequence them, you could understand more	
748:13	about how they functioned, how they were encoded in	
748:14	DNA.	
748:15	Q. What was the -- so after you finished	
748:16	your postdoc research efforts, what was the next	
748:17	job you had?	
748:18	A. Then I -- after that I worked for the	
748:19	California EPA, and this was for the State Water	
748:20	Resources Control Board. I was an environmental	
748:21	scientist but my focus was on fresh water	
748:22	standards.	
748:23	Q. What -- what office of the California	
748:24	EPA did you work at?	
748:25	A. So that was the State Water Resources	
749:1	Control Board. This is the over -- this is the	
749:2	office within California EPA that's responsible for	
749:3	protecting water quality across the state.	
749:4	Q. And was there a physical location	
749:5	where you worked?	
749:6	A. Yes. That was in Sacramento.	
749:7	Downtown Sacramento.	
749:8	Q. Did you live near -- near where you	
749:9	were working?	
749:10	A. I did. I lived in Woodland -- well,	
749:11	at first I lived in Davis. And then we moved -- my	
749:12	wife and I moved to Woodland in 2002.	
749:13	Q. And are Woodland and Davis, they --	
749:14	they are both close to San Francisco, west of San	
749:15	Francisco? Or east? East of San Francisco?	

Page/Line	Source	ID
	749:16 A. East, yeah, east of San Francisco. 749:17 Q. Yeah. West is in the ocean. 749:18 A. It's a little tough out there. And 749:19 they are -- 749:20 MR. WISNER: It's in the bay. 749:21 A. They -- yeah, they are. They're 749:22 about two miles east of San Francisco. Or I'm 749:23 sorry, two hours. 749:24 Q. (BY MR. BRENZA) So you were working 749:25 in, at the California EPA on fresh water standards. 750:1 How -- how did that -- what exactly did you do with 750:2 respect to protecting the clean water of 750:3 California? 750:4 A. We had two functions in our group and 750:5 -- and I worked on both. One was developing new 750:6 water quality standards, you know, whether there -- 750:7 there was one that the state was proposing to come 750:8 up with itself. So this would be, you know, a -- a 750:9 limit on some pollutant in water when I -- I worked 750:10 on a heavy metal called selenium, was one of them. 750:11 The other part of it -- so that was, let's -- you 750:12 know, we were adopting a new water quality standard 750:13 or -- or number for a contaminant. 750:14 The other half of it was reviewing 750:15 actions by the Regional Water Quality Control 750:16 Boards. They are the part of the -- of Cal EPA 750:17 that issues permits, say to a -- a wastewater 750:18 discharge. Like a sewage treatment plant. And if 750:19 the entities they had issued the permit to 750:20 disagreed with the permit, they could appeal to the 750:21 state and then I would provide a technical review 750:22 of the complaint and the response to it. 750:23 Q. About how long did you work 750:24 protecting California's clean water? <b>Reeves, William 01-24-2019 (00:00:01)</b>	REEVES_WILLIAM_01-24-19_01
751:3 - 751:4	751:3 A. It was about two years and eight 751:4 months.	REEVES_WILLIAM_01-24-19_01
764:11 - 766:17	<b>Reeves, William 01-24-2019 (00:02:31)</b> 764:11 Q. What was the next position you held 764:12 at Monsanto?	REEVES_WILLIAM_01-24-19_01

764:13 A. Starting in November of 2018, I  
764:14 joined our agricultural affairs and sustainability  
764:15 team and in that -- in that organization I am the  
764:16 global health and safety issues management lead.  
764:17 And so it's -- it's similar to the work I was doing  
764:18 before but it has a -- responsibilities across our  
764:19 portfolio of products rather than just crop  
764:20 protection alone.  
764:21 Q. Okay. So let's -- let's discuss a  
764:22 little bit about glyphosate itself.  
764:23 A. Sure.  
764:24 Q. Is glyphosate an herbicide?  
764:25 A. Yes, it is.  
765:1 Q. What is an herbicide?  
765:2 A. Those are -- herbicides are molecules  
765:3 that you can use or a chemical you can use to kill  
765:4 a weed.  
765:5 Q. What's the a -- what's the history in  
765:6 -- of the -- of realizing the weed control  
765:7 potential of glyphosate?  
765:8 A. This is a molecule that Monsanto  
765:9 initially discovered its weed control properties.  
765:10 Other companies had developed ways to synthesize  
765:11 glyphosate over the years as part of their own work  
765:12 but they did not realize it could work as a  
765:13 herbicide.  
765:14 Monsanto, as part of research into  
765:15 herbicidal compounds, was synthesizing molecules,  
765:16 looking at different ideas we had internally about  
765:17 would -- trying to answer the question of would  
765:18 this chemical structure work as a herbicide. And  
765:19 after a few rounds of work, glyphosate was  
765:20 identified and it was tested under greenhouse  
765:21 conditions and found to actually be effective.  
765:22 Q. Who discovered the herbicidal  
765:23 properties of glyphosate?  
765:24 A. It was Dr. John Franz.  
765:25 Q. When did he make that discovery?  
766:1 A. That was in -- he was doing the  
766:2 synthesis work and I believe the -- the discovery

Page/Line	Source	ID
	766:3 of its -- of its ability to act as a herbicide was 766:4 1970. 766:5 Q. Was there anything unusual about the 766:6 herbicidal properties of glyphosate? 766:7 A. Yes. Glyphosate was act -- 766:8 glyphosate acts on a broad spectrum of weeds, so 766:9 that means it kills grasses as well as broadleafs, 766:10 which are the plants like clover. It also acts 766:11 systemically. So when it's absorbed by the plant, 766:12 it goes down to the root and it can kill a weed at 766:13 the root so it won't grow back. 766:14 And this -- this combination is -- 766:15 I'm not sure there was another product on the 766:16 market like that at the time, and I don't believe 766:17 there is now.	
766:23 - 767:15	<b>Reeves, William 01-24-2019 (00:00:43)</b> 766:23 Let me -- well, let me ask you this. What happens 766:24 to glyphosate once it's sprayed and does its job 766:25 killing weeds? 767:1 A. There -- there are two things that 767:2 can happen to it. One, it'll be degraded by 767:3 bacteria or fungus in the soil. The other thing is 767:4 that it -- it can bind to soil, so it will actually 767:5 just physically, you know, form a very strong 767:6 attraction to a soil particle or even just bond 767:7 with it. 767:8 Q. And why is that good? 767:9 A. And that -- that means it's not going 767:10 to be, you know, running off or leaching into 767:11 groundwater. And then the fact that it -- that it 767:12 actually is broken down by soil bacteria or fungus 767:13 means it's not going to accumulate in the food 767:14 chain. You're not going to see it, you know, over 767:15 time building up in people or the environment.	REEVES_WILLIAM_01-24-17
769:2 - 769:10	<b>Reeves, William 01-24-2019 (00:00:22)</b> 769:2 Q. Was the discovery of glyphosate and 769:3 the safety testing that accompanied it, did that 769:4 result in glyphosate being registered for use in -- 769:5 in various countries? 769:6 A. That's correct.	REEVES_WILLIAM_01-24-17

Page/Line	Source	ID
769:7 - 776:12	<p>769:7 Q. Was it registered for use in the      769:8 United States?</p> <p>769:9 A. Yes, in the United States in 1975,      769:10 with the first sales occurring in 1976.</p> <p><b>Reeves, William 01-24-2019 (00:00:11)</b></p>	REEVES_COMBINED_03_76
776:15 - 777:6	<p>776:7 Q. (BY MR. BRENZA) So, Doctor, I want      776:8 to pick up where we left off. We were going to      776:9 talk about the benefits of glyphosate and Roundup      776:10 for landscaping use at home.</p> <p>776:11 A. Yes.</p> <p>776:12 Q. Okay.</p> <p><b>Reeves, William 01-24-2019 (00:00:37)</b></p> <p>776:15 Q. (BY MR. BRENZA) What's the benefits      776:16 of Roundup for home use?</p> <p>776:17 A. In home settings one of the things it      776:18 can do, glyphosate-based herbicides are effective      776:19 at controlling poison ivy. And so when you think      776:20 about, you know, having a poison ivy plant in your      776:21 yard, I have actually had this situation quite a      776:22 lot, you know, or poison oak is another one, you      776:23 just don't want to come into contact with these      776:24 plants, you know, you don't want to get -- grab      776:25 them with your hands or -- or try to get them out,      777:1 you know, in a way that's going to cause you to      777:2 come into contact with them.</p> <p>777:3 So the way I use glyphosate-based      777:4 herbicides and other people do is controlling      777:5 poison ivy in a way that keeps you from having to      777:6 come into contact with it.</p>	REEVES_COMBINED_03_76
784:20 - 786:24	<p><b>Reeves, William 01-24-2019 (00:02:32)</b></p> <p>784:20 Q. All right. So if -- do you remember      784:21 that you were asked a number of questions about the      784:22 mouse and rat studies that were originally -- well,      784:23 not originally used but were eventually used by      784:24 Monsanto to register glyphosate with the EPA?</p> <p>784:25 A. I do.</p> <p>785:1 Q. And there was a 1983 mouse study by      785:2 Knezevich and Hogan?</p> <p>785:3 A. I do remember that.</p> <p>785:4 Q. And as a result of that mouse study,</p>	REEVES_COMBINED_03_76

Page/Line	Source	ID
785:5	did the -- did the EPA reach a conclusion about --	
785:6	785:6 a preliminary conclusion about the carcinogenicity	
785:7	785:7 of glyphosate?	
785:8	A. They -- they did have some	
785:9	785:9 preliminary conclusions. They were not made final	
785:10	785:10 by the agency.	
785:11	785:11 Q. Do you remember that there was a	
785:12	785:12 document you were shown where Monsanto had hired	
785:13	785:13 somebody called Dr. -- named Dr. Kushner to review	
785:14	785:14 the mouse biopsies?	
785:15	A. I do recall that.	
785:16	Q. Did Monsanto tell Dr. Kushner what he	
785:17	785:17 should find with respect to his review of those	
785:18	785:18 mouse biopsies?	
785:19	A. No, Monsanto did not do that.	
785:20	Q. How do you know that?	
785:21	A. The -- so Monsanto, when we work with	
785:22	785:22 external experts, you know, the -- you know, when	
785:23	785:23 you're talking about the science experts, the idea	
785:24	785:24 is that you want to find someone who knows their	
785:25	785:25 field, who understands the material that you're	
786:1	786:1 asking them to investigate and advise us on, but we	
786:2	786:2 also make sure, you know, we're not -- we're not	
786:3	786:3 going out there and telling them, you know -- we	
786:4	786:4 don't engage an expert and say this is what we want	
786:5	786:5 you to find, please do the following. It's please	
786:6	786:6 look into this and tell us what you find.	
786:7	Q. Now, why -- it may be obvious but why	
786:8	786:8 wouldn't you tell an expert what to find?	
786:9	A. So if -- if you're doing that, you	
786:10	786:10 know, they are not really acting as an expert, but	
786:11	786:11 more importantly, when you're doing something as	
786:12	786:12 serious as dealing with the regulatory agency, you	
786:13	786:13 know, putting information in front of them for them	
786:14	786:14 to make a conclusion, if you give them, you know,	
786:15	786:15 information that's false, that's not going to --	
786:16	786:16 they're going to spend their -- they're going to	
786:17	786:17 waste their time reviewing that and then they're	
786:18	786:18 going to come back to you and say not only did you	
786:19	786:19 waste our time, you gave us false information.	

Page/Line	Source	ID
	786:20 This isn't -- that's not a productive 786:21 interaction with the regulatory agency. You want 786:22 to make sure you're giving them as much factual 786:23 information as possible so that you're able to 786:24 obtain the registration or the approval.	
787:14 - 789:1	<b>Reeves, William 01-24-2019 (00:01:43)</b>  787:14 Q. Is Exhibit 95 the conclusion of the 787:15 EPA about the proper classification of glyphosate 787:16 based on mouse and rat studies? 787:17 A. Yes. Following the -- the two rat 787:18 studies and the mouse study we discussed 787:19 previously. 787:20 Q. So let's -- let's talk about those 787:21 studies for a moment. The -- the first rat study 787:22 was found to have inadequate dosing of rats; right? 787:23 A. That's correct. The -- the agency at 787:24 the time expressed concern that the doses were too 787:25 low to really inform full assessment, and since 788:1 that time other regulatory agencies around the 788:2 world have -- have concluded the same thing about 788:3 it. That they're -- we have better data to rely on 788:4 than this. 788:5 Q. Did Monsanto commission a replacement 788:6 or repeat rat study to dose the rats with more 788:7 glyphosate? 788:8 A. Yes, we did. 788:9 Q. And at the same time they also 788:10 performed the mouse study that we heard so much 788:11 about yesterday? 788:12 A. Yes, the mouse study was underway 788:13 first, and the rat study began later on. So the 788:14 mouse data were available first. 788:15 Q. Now, when the mouse study -- the 788:16 mouse study received a number of different reviews 788:17 at the EPA; right? 788:18 A. That's correct. 788:19 Q. And there was some disagreement along 788:20 the way about what the mouse study -- that first 788:21 mouse study really showed? 788:22 A. That's correct.	

Page/Line	Source	ID
	788:23 Q. But in the end, the -- a number of 788:24 experts reviewed those, reviewed that mouse study 788:25 and concluded that it -- it provided evidence that 789:1 glyphosate was not a carcinogenic?	
789:7 - 789:9	<b>Reeves, William 01-24-2019 (00:00:04)</b>	
	789:7 Q. (BY MR. BRENZA) What did the -- what 789:8 did the EPA ultimately conclude about that first 789:9 mouse study?	
789:12 - 792:2	<b>Reeves, William 01-24-2019 (00:02:55)</b>	
	789:12 A. So based on -- on the documents that 789:13 I've seen, they concluded that they wanted, you 789:14 know, at -- as we discussed yesterday, they wanted 789:15 a repeat of the mouse study. Through conversations 789:16 with them we said we're having -- we have a rat 789:17 study coming. Let's see what that study shows. 789:18 And then at that time decide do we need to do 789:19 another mouse study. 789:20 Q. (BY MR. BRENZA) Okay. And is that 789:21 recorded on page 4 of Exhibit 95? Do you -- well, 789:22 let me -- let me ask it this way. Do you see the 789:23 second full paragraph on page 4 of Exhibit 95 -- 789:24 A. Yes, I do. 789:25 Q. -- beginning with "HED"?	
	790:1 A. I do see that. 790:2 Q. It says, "HED deferred a decision on 790:3 the repeat of an additional mouse oncogenicity 790:4 study until the 1990 rat feeding study had been 790:5 evaluated by the Peer Review Committee." 790:6 A. That is correct. That's what it 790:7 says. 790:8 Q. Did -- did the EP -- so we heard the 790:9 questions yesterday about the EPA wanting a mouse 790:10 and a rat study and -- and Mr. Wisner suggested 790:11 that Monsanto refused to do one of the studies the 790:12 EPA wanted. 790:13 Is that a fair understanding of what 790:14 happened here? 790:15 A. No. What -- what the EPA is 790:16 describing here is that the health effects division 790:17 is HED. They deferred their decision about whether	

Page/Line	Source	ID
790:18	we needed another repeat mouse study until they	
790:19	could see the results of this repeated rat study.	
790:20	Q. So are you familiar with the results	
790:21	of the repeated rat study?	
790:22	A. Yes, I am.	
790:23	Q. And what did the repeated rat study	
790:24	show about the safety of glyphosate?	
790:25	A. EPA concluded that -- that this	
791:1	repeated rat study, along with the existing mouse	
791:2	study, supported a conclusion that glyphosate could	
791:3	be classified in group E.	
791:4	Q. What's -- and Group -- what is Group	
791:5	E? Well, let me -- let me just direct your	
791:6	attention to the -- the final page of Exhibit 95	
791:7	says Classification.	
791:8	Do you see that?	
791:9	A. I do see that.	
791:10	Q. And there it says, "Considering	
791:11	criteria confined EPA guidelines for classifying a	
791:12	carcinogen, the committee concluded that glyphosate	
791:13	should be classified as a Group E (evidence of	
791:14	non-carcinogenicity for humans), based on lack of	
791:15	convincing carcinogenicity evidence in adequate	
791:16	studies in two animal species."	
791:17	You see that?	
791:18	A. I do see that. That's what they	
791:19	concluded here.	
791:20	Q. And so a Group E means what?	
791:21	A. Group E, their description is	
791:22	"evidence of non-carcinogenicity for humans," that	
791:23	-- and that was their -- their definition here in	
791:24	1991 following that review.	
791:25	Q. What were the two species in which	
792:1	non-carcinogenicity had been proven by studies?	
792:2	A. Rat --	
792:5 - 793:1	<b>Reeves, William 01-24-2019 (00:00:58)</b>	
792:5	A. In rats and mice. Those were the two	
792:6	species.	
792:7	Q. (BY MR. BRENZA) Are you aware of any	
792:8	rat or mice studies the EPA wanted Monsanto to	

Page/Line	Source	ID
792:9	perform that it didn't perform?	
792:10	A. No, I am not.	
792:11	Q. Was that even a feasible thing to	
792:12	have happen?	
792:13	A. To conduct a rat or a mouse study?	
792:14	Q. To refuse to conduct a rat or mouse	
792:15	study that the EPA asks you to perform?	
792:16	A. Once -- once they issue -- we talked	
792:17	yesterday about a data call in. And so that's the	
792:18	way -- that's how EPA can order a registrant to	
792:19	turn in data.	
792:20	You can -- you can have discussions	
792:21	about EPA, with EPA about data requirements and	
792:22	whether things are needed, but, you know, if -- if	
792:23	they decide you're going to do something, you don't	
792:24	have a -- you don't have a choice in that. In	
792:25	order to maintain your product registration, you	
793:1	have to give them the data they're asking for.	

Total Time = 00:56:19

Documents Shown

EXHIBIT 100  
EXHIBIT 505  
EXHIBIT 506  
EXHIBIT 508  
EXHIBIT 509  
EXHIBIT 510  
EXHIBIT 511  
EXHIBIT 512  
EXHIBIT 514  
EXHIBIT 515  
MONSANTO 95