

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: ROUNDUP PRODUCTS
LIABILITY LITIGATION

MDL No. 2741

Case No. 16-md-02741-VC

This document relates to:
ALL ACTIONS

**PRETRIAL ORDER NO. 79:
CONFIDENTIALITY OF
JUROR QUESTIONNAIRES**

The completed juror questionnaires shall be treated by the parties and their counsel as being confidential and private. Each party may make 12 copies of the completed questionnaires. The parties may also create an electronic version of the questionnaires provided it is both encrypted and password protected. All physical and electronic copies of the questionnaires must be destroyed by the parties, and the parties must file an affidavit attesting that they have done so within 48 hours of the completion of jury selection on February 20, 2019.

Absent permission from the Court, the completed juror questionnaires may be disclosed only to the following persons and only insofar as is reasonably necessary for the purpose of selecting a jury for the first bellwether trial in this action:

- (a) Parties, their representatives, in-house counsel, and regular employees who are actively engaged in or actively overseeing this action;
- (b) Counsel of record in this action, including their associated attorneys, paralegal and secretarial personnel, and other support staff;
- (c) Professional jury or trial consultants (including their employees) who are retained by a party to assist in this action.


Counsel for each party disclosing the juror questionnaires in accordance with this Order shall (i)

advise each person to whom such disclosure is made of the terms of this Order and of the obligation of each such person to comply with those terms and (ii) provide a copy of this Order to each such person. Prior to the disclosure of the juror questionnaires to any person identified in subparagraph (c) above, such person shall sign an Acknowledgement, in the form attached hereto, acknowledging that he or she has read this Order and shall abide by its terms.

Counsel shall maintain a list of persons to whom the questionnaires are disclosed. Upon learning of any disclosure of the questionnaires to any person not authorized by this paragraph to view the questionnaires, the party who so learns shall immediately inform the Court in writing.

IT IS SO ORDERED.

Date: February 13, 2019


Honorable Vince Chhabria
United States District Court

ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND

I, _____ [print or type full name], of
_____ [print or type full address],
declare under penalty of perjury that I have read in its entirety and understand the Confidentiality
Order that was issued by the United States District Court for the Northern District of California
on February 13, 2019, in In re: Roundup Products Liability Litigation, Case No. 3:16-md-02741-
VC (N.D. Cal.). I agree to comply with and to be bound by all the terms of this Protective and
Confidentiality Order and I understand and acknowledge that failure to so comply could expose
me to sanctions and punishment in the nature of contempt. I solemnly promise that I will not
disclose in any manner any information or item that is subject to this Confidentiality Order to any
person or entity except in strict compliance with the provisions of this Order. I further agree to
submit to the jurisdiction of the United States District Court for the Northern District of
California for the purpose of enforcing the terms of this Protective and Confidentiality Order,
even if such enforcement proceedings occur after termination of this action. I hereby appoint
_____ [print or type full name] of _____ [print or type full address
and telephone number] as my California agent for service of process in connection with this
action or any proceedings related to enforcement of this Confidentiality Order.

Date: _____

City and State where sworn and signed: _____

Printed name: _____

Signature: _____