

Cause No. 91-1938-C-7

ANSWER TO INTERROGATORY

Come now defendants, and for their answer to interrogatory number 16, state as follows:

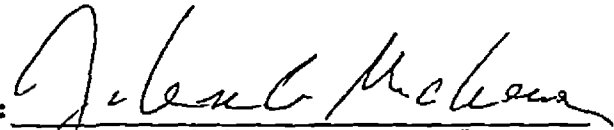
1. Dr. Richard Clapp, Center for Environmental Health Studies, Boston, Massachusetts; Dr. David Ozonoff, Boston University, Boston, Massachusetts; Dr. Devra Davis, Washington, D.C., Dr. Ellen Silbergeld, University of Maryland, will all testify on epidemiological studies, including methodology and techniques employed, and scientific validity of same. They will all criticize the Monsanto studies. They may also testify as to the link between dioxin and cancer. Dr. Samuel Epstein, University of Illinois, Chicago, will testify as to the inaccuracies of the Monsanto studies in the context of corporate fraud, and will criticize those studies. He may also testify as to the link between dioxin and cancer.

The testimony of these experts will be based upon their experience, background, teaching, and review of documents.

Defendants reserve their right to supplement this response as necessary to rebut plaintiff's evidence.

EVANS & DIXON

BY:


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CERTIFICATE OF SERVICE

Copy of the foregoing mailed this 4th day of November, 1991 to Richard A. Wunderlich, Daniel D. Zegura, Attorneys for Plaintiff, 8182 Maryland Avenue, Suite 400, Clayton, MO 63105; and Gerald Ortvals, Attorney for Plaintiffs, 1800 Equitable Building, 10 South Broadway, St. Louis, MO 63102.

