

1 Haytham Faraj, Esq. (SBN 291416)  
Katherine K. Melik-Stepanyan (SBN 315015)  
2 Bitar R. Tahmasbi, Esq. (SBN 354619)  
3 **THE LAW OFFICES OF HAYTHAM FARAJ**  
21600 Oxnard Street, Suite 920  
4 Woodland Hills, CA 91367  
Telephone: (310) 601-7696  
5 Facsimile: (202)280-1039  
Email: service@farajlaw.com

6  
7 *Attorneys for Plaintiff*

8 Jennise Walker-Stubbs, Esq.  
**SHOOK, HARDY & BACON, LLP**  
9 600 Travis Street, Suite 3400  
Houston, TX 77002-2026  
10 Telephone: (713) 227-8008  
11 Facsimile: (713) 227-9508  
Email: jstubbs@shb.com

12 *Attorney for Defendant Monsanto Company*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**

16 IN RE: ROUNDUP PRODUCTS  
17 LIABILITY LITIGATION

MDL No. 2741  
Case No. 3:16-md-02741-VC

18 This document relates to:

**STIPULATION OF DISMISSAL WITH  
PREJUDICE**

19 *Shanda Lamar, an individual and successor in*  
20 *interest to decedent Derrick Lamar v. Monsanto*  
*Company*  
21 Case No. 3:22-cv-06389-VC

22  
23 Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff and  
24 Defendant Monsanto Company, by and through their undersigned counsel, hereby stipulate to the  
25 voluntary dismissal with prejudice of the above-captioned case (including all claims asserted by  
26 Plaintiff), with each party to bear their own attorneys' fees and costs.  
27  
28

1 Counsel for Plaintiff has read Pretrial Order No 236, ECF 13192, and hereby certify they  
2 have complied with the common benefit hold back required therein. Specifically, Counsel for  
3 Plaintiff hereby certify that the 8% hold back of the gross recovery for any plaintiff dismissed  
4 pursuant to this stipulation or motion has been sent to the Common Benefit Fund. Counsel for  
5 Plaintiff further certifies that the 8% hold back has been withheld from the attorney fee portion of  
6 the recovery only, and not their clients' portion. Judge Chhabria has ruled that common-benefit  
7 fees should not be taken from Plaintiffs' recovery.

8  
9 DATED: May 6, 2026

Respectfully submitted,

10 /s/ Haytham Faraj

11 Haytham Faraj, Esq.

**THE LAW OFFICES OF HAYTHAM FARAJ**

21600 Oxnard Street, Suite 920

Woodland Hills, CA 91367

Telephone:(310) 601-7696

Facsimile: (202)280-1039

Email: service@farajlaw.com

12  
13  
14  
15  
16 *Attorney for Plaintiff*

17  
18 /s/ Jennise Walker-Stubbs

19 Jennise Walker-Stubbs, Esq.

**SHOOK, HARDY & BACON, LLP**

600 Travis Street, Suite 3400

Houston, TX 77002-2026

Telephone: (713) 227-8008

Facsimile: (713) 227-9508

Email: jstubbs@shb.com

20  
21  
22  
23  
24 *Attorney for Defendant Monsanto Company*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**ATTESTATION**

Pursuant to Civil Local Rule 5-1, I, Haytham Faraj, attest that the signatory listed above, and on whose behalf this stipulation is submitted, concurs in and has authorized this filing.

/s/ Haytham Faraj  
Haytham Faraj, Esq.  
**The Law Offices of Haytham Faraj**  
*Attorney for Plaintiff*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: ROUNDUP PRODUCTS  
LIABILITY LITIGATION

MDL No. 2741  
Case No. 3:16-md-02741-VC

This document relates to:  
  
*Shanda Lamar, an individual and successor in  
interest to decedent Derrick Lamar v. Monsanto  
Company*  
Case No. 3:22-cv-06389-VC

**[PROPOSED] ORDER GRANTING  
JOINT STIPULATION OF DISMISSAL  
WITH PREJUDICE**

THIS CAUSE having come before the Court on the Joint Stipulation of Dismissal with Prejudice. Having reviewed said request, and finding good cause, the Court GRANTS the Joint Stipulation of Dismissal with Prejudice as to the above referenced captioned matter.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Vince Chhabria  
United States District Judge