

Bayer in its prior responses have been addressed at length in the Reply in Support of Plaintiffs' Motion to Exclude Expert Designation, Report and Testimony of Cheryl Shuffield and Robert Winter (D.I. 1571), the Mississippi Plaintiffs' Reply in Further Support of their Motion to Exclude/Limit the Designation, Report and Testimony of Cheryl Shuffield (D.I. 2012), and exhibits attached thereto, which the Arkansas Plaintiffs hereby incorporate by reference.

As its sole additional point, Bayer attempts to dismiss Shuffield's lack of foundation regarding the Arkansas Plaintiffs as "inaccurate and premature" on the grounds that "Ms. Shuffield will be providing a damage report specific to the Arkansas plaintiffs at issue here." The Bayer Defendants' Response to the Arkansas Plaintiffs' Motion to Exclude Reports and Testimony of Cheryl Shuffield (D.I. 4069) at 2. Ms. Shuffield has issued three short supplemental reports regarding the Arkansas Plaintiffs and the parties are currently in the process of scheduling a deposition regarding her opinions as to the Arkansas Plaintiffs. As noted in the Arkansas Plaintiff's original filing, the Arkansas Plaintiffs expressly reserve the right to file additional objections regarding Shuffield's opinions as the Arkansas Plaintiffs upon obtaining additional information regarding the bases for such opinions.

For the reasons set forth in Arkansas Plaintiffs' Motion to Exclude Expert Report and Testimony of Cheryl Shuffield and the previously filed reply briefs, the Arkansas Plaintiff's motion should be granted in its entirety.

Dated: March 4, 2011

GRAY, RITTER & GRAHAM, P.C.

By: /s/ Don M. Downing
Don M. Downing, Bar # 30405MO
Gretchen Garrison, Bar # 33963MO

Jason D. Sapp, Bar #58511MO
701 Market Street, Suite 800
St. Louis, Missouri 63101-1826
Tel: (314) 241-5620
Fax: (314) 241-4140
ddowning@grgpc.com
ggarrison@grgpc.com
jsapp@grgpc.com

Plaintiffs' Designated Co-Lead and Liaison Counsel

By: /s/ Adam J. Levitt _____
Adam J. Levitt
Stacey T. Kelly
**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC**
55 West Monroe Street, Suite 1111
Chicago, Illinois 60603
Tel: (312) 984-0000
Fax: (312) 984-0001
levitt@whafh.com
skelly@whafh.com

Plaintiffs' Designated Co-Lead Counsel

Richard J. Arsenault
John Randall Whaley
Jennifer M. Hoekstra
NEBLETT BEARD & ARSENAULT, LLP
2220 Bonaventure Court, P.O. Box 1190
Alexandria, Louisiana 71309
Tel: (800) 256-1050
Fax: (318) 561-2591

Scott E. Poynter
EMERSON POYNTER LLP
500 President Clinton Avenue, Suite 305
Little Rock, Arkansas 72201
Tel: (501) 907-2555
Fax: (501) 907-2556

Stephen A. Weiss
Diogenes P. Kekatos
James A. O'Brien III
SEEGER WEISS LLP
One William Street
New York, New York 10004
Tel: (212) 584-0700
Fax: (212) 584-0799

Joe R. Whatley Jr.
Deborah Clark Weintraub
Adam P. Plant
WHATLEY DRAKE & KALLAS LLP
2001 Park Place North, Suite 1000
Birmingham, Alabama 35203
Tel: (205) 328-9576
Fax: (205) 328-9669

William B. Chaney
James L. Reed
William J. French
Michael Kelsheimer
Drew York
LOOPER REED & MCGRAW
1601 Elm Street, Suite 4600
Dallas, Texas 75201
Tel: (214) 237-6403
Fax: (214) 953-1332

Ralph E. Chapman
Sara B. Russo
CHAPMAN, LEWIS & SWAN
501 First Street
P. O. Box 428
Clarksdale, Mississippi 38614
Tel: (662) 627-4105
Fax: (662) 627-4171

Plaintiffs' Executive Committee

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this 4th day of March, 2011, electronically filed a copy of the foregoing with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ Don M. Downing