

**MOTLEY RICE NEW JERSEY LLC**

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*Attorneys for Plaintiff*

**FILED**

**SEP 03 2025**

**CRISTINA A. PASQUANO, J.S.C.**

MARINA MYASKOVSKAYA,

Plaintiff,

v.

MONSANTO COMPANY, BAYER  
CROPSCIENCE LP, BAYER  
CROPSCIENCE LLC, BAYER  
CORPORATION, BAYER U.S. LLC, and  
JOHN DOE CORPORATIONS 1-50,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
BERGEN COUNTY

DOCKET NO. BER-L-004424-25

**CONSENT ORDER TO REINSTATE  
COMPLAINT**

**THIS MATTER** having been opened to the Court for entry of a Consent Order to amend and modify the Amended Order entered February 28, 2025, dismissing without prejudice the above-referenced matter against Defendants Bayer Corporation, Bayer CropScience LP, Bayer U.S. LLC and Monsanto Company, and all parties having consented to the entry of this Order, and the Court having considered the form, entry and submission of this Order, and no cause being shown to the contrary;

IT IS on this 3<sup>RD</sup> day of September, 2025,

**ORDERED** that the Amended Order entered on February 28, 2025 (1) granting defendants' motion to dismiss; and (2) stating that all common law claims alleged in Counts I through II are subsumed by the PLA and dismissed without prejudice; and (3) Count III is dismissed without prejudice against Defendants Bayer Corporation, Bayer CropScience LP, Bayer

U.S. LLC and Monsanto Company is hereby **AMENDED AND MODIFIED *nunc pro tunc***; and

**IT IS FURTHER ORDERED** that the matter is hereby **REINSTATED** as to Plaintiff's product's liability causes of action under Counts I and II; namely Plaintiff's claims of (1) Strict Liability (Design Defect) Under the New Jersey Product Liability Act; and (2) Strict Liability (Failure to Warn) Under the New Jersey Product Liability Act.

**IT IS FURTHER ORDERED** that Plaintiff's claims asserted against Defendants Bayer Corporation, Bayer CropScience LP, Bayer U.S. LLC and Monsanto Company are hereby **REINSTATED *nunc pro tunc*** and that this matter is restored to active trial status.

**IT IS FURTHER ORDERED** that Defendants Bayer Corporation, Bayer CropScience LP, Bayer U.S. LLC and Monsanto Company are permitted to file and serve their Answers to Complaint or otherwise plead which were placed on the record on February 25, 2025, without further action needed, and same are hereby deemed "filed".

The undersigned counsel of record hereby consent to the form and entry of this Order.

Dated: July 24, 2025

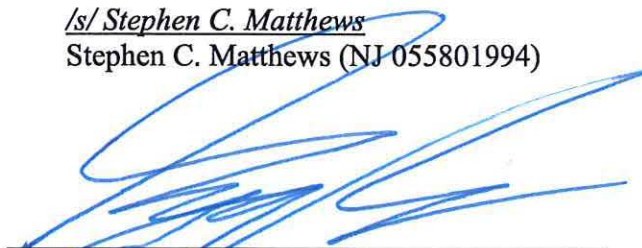
**MOTLEY RICE NEW JERSEY LLC**  
*Attorneys for Plaintiff*

/s/ Daniel Lapinski  
Daniel Lapinski (NJ 004612001)

**DLA PIPER LLP (US)**  
*Attorneys for Defendants Monsanto Company, Bayer Corporation, Bayer U.S. LLC, and Bayer CropScience LP*

/s/ Stephen C. Matthews  
Stephen C. Matthews (NJ 055801994)

**SO ORDERED:**

  
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**GREGG A. PADOVANO, J.S.C.** J.S.C.

DATED: September 3, 2025