

Exhibit 21

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

BADER FARMS, INC. and)	
BILL BADER,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:16-cv-00299
)	
MONSANTO CO.,)	
)	
Defendant.)	

AFFIDAVIT OF DR. FORD L. BALDWIN

1. My name is Dr. Ford L. Baldwin and I reside in Austin, Arkansas. I certify that I am over eighteen years of age. I am competent to attest to the factual matters set forth in this Affidavit. If called as a witness in this matter, I could and would testify to the matters set forth in this Affidavit from my own personal knowledge and recollection.

Background and Qualifications

2. I am currently a Partner at Practical Weed Consultants, LLC, a professional agricultural crop consulting business located in Austin, Arkansas. I am also a *Professor Emeritus* at the University of Arkansas.

3. I received a Bachelor of Science Degree in Crop Science from the University of Arkansas in 1969 and a Master of Science Degree in Agronomy with a specialty in Weed Science from the University of Arkansas in 1971. I received a Ph.D. in Agronomy with a specialty in Weed Science from Oklahoma State University in 1974.

4. From 1974 until 2002, I was employed as a weed scientist by the University of Arkansas Cooperative Extension Service. In 1994, I was promoted to the level of Distinguished Extension Specialist and was the first specialist to attain that rank at the University of Arkansas. My responsibilities as a weed scientist were to conduct applied research trials for weed control on cotton, rice, soybean, and wheat, among various other crops, and to develop educational materials for the transfer of weed control information to farmers.

5. During my tenure at the University of Arkansas, I conducted field work, research, and performed studies on herbicides, herbicide drift, weed control technology, and weed resistance, including research, study, and testing on dicamba and other herbicides, especially glyphosate and 2,4-D. I also consulted on control of opium poppy for the U.S. Department of State in 1983-1984 in Culiacan, Mexico. By order of subpoena, I testified countless times as a weed science expert or investigator in various Arkansas courts. As a result of my research efforts, I have authored or co-authored over 160 scientific publications, including 13 peer-reviewed journal articles related to weed science, weed control, and agronomy. I have delivered invitational papers and spoken at over 70 symposiums, conferences, and meetings around the world on a host of subjects related to weed science, agronomy, and how herbicides impact weed resistance. *See Exhibit 1A – Curriculum Vitae: Ford L. Baldwin, Ph.D.*

6. I have received many honors and awards for my work in weed science and agronomy over my career, from a Graduate Excellence Award from Oklahoma State University in 1974 to Friend of the Farmer Award from Riceland Foods, Inc. in 2006.

7. In 2002, I retired from my position at the University of Arkansas Cooperative Extension Service, and thereafter founded Practical Weed Consultants, LLC, a consulting firm that my wife and I operate.

8. In my current capacity as a consultant, I am involved in most of the same type of activities as when I was an academic scientist. My work includes, but is not limited to, consulting for my corporate clients, including Riceland Foods and Bayer, other herbicide manufacturers, marketing cooperatives, and farmers throughout the Midwest and South. Since 2006, I have been a speaker for Bayer Crop Science, speaking at grower meetings to farmers and agricultural growers approximately 15-30 times per year. For Riceland Foods, I answer troubleshooting calls and emails for any Riceland food member and also conduct field work in rice, soybeans, and corn for these farmers. I am frequently invited by other university scientists to speak on a variety of weed science and agronomy issues. I conduct internal consulting for seed companies, speaking to their employees about weed science, seed science practices, weed resistance, herbicide drift, and the like. I have served as a mediator for insurance companies in crop damage matters. With all of my clients, I speak to and educate them on herbicide products and weed management issues, including herbicide drift.

9. My expertise and experience includes years of investigations and assessments of the development and management of herbicides, including herbicide manufacturing plant issues, working with companies on their weed science issues, and with colleagues in other states who had great use for dicamba.

10. Since 1974, I have consistently attended Arkansas State Plant Board meetings, offering my expert opinion and giving written and verbal testimony on a variety of herbicide issues, including dicamba drift and the effect of dicamba on plants. Post-retirement, I continued in this same capacity before the Plant Board and regularly attend these meetings, including meetings on off-target issues with dicamba. In 2016, the Arkansas State Plant Board asked me

attend all pesticide committee meetings involving dicamba, including meetings on complaints, fines, and penalties for illegal dicamba spraying.

11. As a professor, weed scientist, and consultant, I routinely work, consult, interact, and collaborate with other weed scientists and agronomists, including but not limited to Dr. Jason Norsworthy, Dr. Tom Barber, Dr. Bob Scott, all weed scientists at the University of Arkansas, Dr. Larry Steckel, a weed scientist at the University of Tennessee, Dr. Aaron Hagar, a weed scientist at the University of Illinois, and Dr. Kevin Bradley, a weed scientist at the University of Missouri.

12. I have written over 1,200 articles in popular farm press publications. Since 1976, I have written a weekly column for the *Delta Farm Press*.

13. I have written dozens of articles on herbicide drift, in general, and at least a dozen articles on the effects of dicamba on plants. Several of these articles, as early as 2013, predict the problems and damage caused by Monsanto's decision to use dicamba in its Xtend seeds.

14. I have given testimony as an expert witness in at least ten civil cases in federal and state courts, regulatory hearings, and enforcement actions and investigations pertaining to herbicide and pesticide issues, including cases or incidents related to dicamba herbicides. I also functioned as a mediator in two drift incidents involving dicamba.

15. A list of many of the cases and legal matters in which I have rendered opinions on herbicides is included in my Curriculum Vitae. See Exhibit 1A, pp. 19-20.

16. In my experience testifying as an expert witness in courts across the country, I have offered my opinion on a variety of herbicide and weed science issues, including 2,4-D drift, picloram drift, and weed control failure.

SWORN SIGNATURE

STATE OF Arkansas)
)
COUNTY OF Lonoke) ss.:

I declare under the penalty of perjury that the foregoing is true and correct.

Ford L. Baldwin
Ford L. Baldwin

4/27/2017
Date

SWORN TO AND SUBSCRIBED before me, a Notary public, on this 27th day of April, 2017, the above individual, known to me, and executed the above affidavit and acknowledged the same as his own free act and deed.

Wendy Threet
Notary Public

**Wendy Threet
Notary Public - State of Arkansas
Lonoke County
My Commission Expires 02-22-2021
Commission # 12380849**