

Exhibit 591

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| 1 | | | - - - - - |
| | | | E R R A T A |
| 2 | | | - - - - - |
| 3 | | | |
| 4 | PAGE | LINE | CHANGE |
| 5 | <u>14</u> | <u>8,9</u> | <u>"Thelan" should be "Telan"</u> |
| 6 | | REASON : | <u>Deponent clarification</u> |
| 7 | <u>24</u> | <u>8</u> | <u>Add "Yes. It was Bailey. Lisa Bailey"</u> |
| 8 | | REASON : | <u>Deponent intended to add</u> |
| 9 | <u>29</u> | <u>7</u> | <u>Change "cautions" to "causes"</u> |
| 10 | | REASON : | <u>Stenographer Error</u> |
| 11 | <u>46</u> | <u>10</u> | <u>Replace "I don't believe I have" with "I believe I read it, but it was quite a long time ago and I don't recall any of its details"</u> |
| 12 | | REASON : | <u>Deponent clarification</u> |
| 13 | <u>52</u> | <u>3</u> | <u>Add "according to the ATSDR Report"</u> |
| 14 | | REASON : | <u>Deponent intended to add</u> |
| 15 | <u>52</u> | <u>19</u> | <u>Change "appealed" to "appeared"</u> |
| 16 | | REASON : | <u>Stenographer Error</u> |
| 17 | <u>70</u> | <u>2</u> | <u>Add "It does not mean an association may not exist.:"</u> |
| 18 | | REASON : | <u>Deponent intended to add</u> |
| 19 | <u>76</u> | <u>14</u> | <u>Replace "No, I haven't." with "Yes, I have."</u> |
| 20 | | REASON : | <u>Deponent clarification</u> |
| 21 | <u>78</u> | <u>15</u> | <u>Replace "I don't recall." with "The TechFlowMP Model includes degradation products of PCE. I chose the MT3DMS reflective of PCE along."</u> |
| 22 | | REASON : | <u>Deponent clarification</u> |
| 23 | <u>78</u> | <u>18-19</u> | <u>Replace " I believe I read at the time, but I don't recall." with "The TechFlowMP Model includes degradation products of PCE. MT3DMS reflective of PCE alone."</u> |
| 24 | | REASON : | <u>Deponent clarification</u> |

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| 4 | PAGE | LINE | CHANGE |
| 5 | <u>82</u> | <u>22</u> | Replace "I'm not aware." with "She used both MT3DMS and TechFlow, but not Monte Carlo." |
| 6 | | REASON : | <u>Deponent clarification</u> |
| 7 | <u>86</u> | <u>15</u> | <u>Replace "Are you indicating to me that -" with "Looks like I should have written 2,708,455 micrograms, not 2,036,600 micrograms"</u> |
| 8 | | REASON : | <u>Deponent clarification</u> |
| 9 | <u>88</u> | <u>1</u> | <u>Add "I should have written 2,708,455 micrograms, not 2,036,600 micrograms."</u> |
| 10 | | REASON : | <u>Deponent meant to add</u> |
| 11 | <u>88</u> | <u>8</u> | <u>Add "I should have written 43,642 micrograms, not 33,244 micrograms."</u> |
| 12 | | REASON : | <u>Deponent intended to add</u> |
| 13 | <u>92</u> | <u>3</u> | <u>Delete "per liter"</u> |
| 14 | | REASON : | <u>Deponent did not intend to add</u> |
| 15 | <u>94</u> | <u>8</u> | <u>Delete "I think"</u> |
| 16 | | REASON : | <u>Deponent did not intend to add</u> |
| 17 | <u>100</u> | <u>9</u> | <u>Replace "contents" with "contaminants"</u> |
| 18 | | REASON : | <u>Stenographer error</u> |
| 19 | <u>101</u> | <u>9</u> | <u>Replace "frequency" with "duration"</u> |
| 20 | | REASON : | <u>Deponent clarification</u> |
| 21 | <u>103</u> | <u>14</u> | <u>Delete "I believe"</u> |
| 22 | | REASON : | <u>Deponent did not intend to add</u> |
| 23 | <u>110</u> | <u>11</u> | <u>Add "but his chemotherapy likely contributed to it."</u> |
| 24 | | REASON : | <u>Deponent intended to add</u> |

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E R R A T A

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4 PAGE LINE CHANGE

5 117 25 Add "neurotoxic drugs are given with caution anytime a patient
has underlying neuropathy"

6 REASON : Deponent intended to add

7 122 3 Following "study" add "of 20 patients"

8 REASON : Deponent intended to add

9 125 8 Change "chronobacter" to "chromobacter"

10 REASON : Stenographer Error

11 134-135 22 - 1 Replace this answer with "For more common lymphomas it may
be more difficult to prove statistically."

12 REASON : Deponent intended to add

13 140 14 , 25 Change "chronobacter" to "chromobacter"

14 REASON : Stenographer Error

15 141 3 Change "chronobacter" to "chromobacter"

16 REASON : Stenographer Error

17 144 8 Add "if there's no known causative factor."

18 REASON : Deponent intended to add

19 145 21 Delete "I don't think so"

20 REASON : Deponent clarification
Replace "diagnosis of exclusions" with "diagnosis by
21 152 9 , 12 exclusion"

22 REASON : Deponent clarification

23 156 6 Change "A very weak association with the overall diagnosis of non-
Hodgkin lymphoma" to "A weak association with the overall diagnosis
of non-Hodgkin lymphoma. but an association nevertheless"

24 REASON : Deponent clarification

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E R R A T A

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PAGE LINE CHANGE

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157 8

Add "at the level of significance of .05, but that does not mean there is no association"

6

REASON :

Deponent intended to add

7

159 2 , 18

Add "within the limits of this study"

8

REASON :

Deponent intended to add

9

160 3

Add "within the limits of this study"

10

REASON :

Deponent intended to add

11

160 23

Add "or perhaps a plateau between low and medium duration"

12

REASON :

Deponent intended to add

13

172 20

Replace "So I—I don't recall." with "As I noted in the report, I used the numbers based upon his deposition-based informed activities."

14

REASON :

Deponent clarification

15

179 1

Add "Micrograms per liter is the same as parts per billion."

16

REASON :

Deponent intended to add

17

179 5

Delete "I think"

18

REASON :

Deponent did not intend to add

19

179 5 , 6

Change "looks" to "look"

20

REASON :

Stenographer error

21

186 9

Delete "Is that what it - yeah."

22

REASON :

Deponent did not intend to add

23

193 24

Replace "say" with "see"

24

REASON :

Deponent Clarification

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Add "However, in the abstract it states, "There is strong evidence for multiple environmental exposures in DLBCL etiology, including exposure to trichloroethylene, benzene, and pesticides and herbicides, with recent associations noted with glyphosphate."

trichloroethylene, benzene, and pesticides and herbicides, with recent associations noted with glyphosphate."

Deponent intended to add

Add "But as I noted there are additional factors."

Deponent intended to add

Following "association" add "that was statistically significant"

Deponent intended to add

Add "But the risk in the general population is about 7 per 100,000."

Deponent intended to add

Add "Only time will tell"

Deponent intended to add _____

Add "except for humoral deficiency."

Deponent intended to add

Add "In a purely statistical sense, at the conventional levels of significance"

of significance"

Deponent intended to add

Add "That would include all of the planning, the execution, and the analysis."

Deponent intended to add

1
2 ACKNOWLEDGMENT OF DEPONENT
3

4 I, Richard T. Hoppe, MD, do
5 hereby certify that I have read the
6 foregoing pages, and that the same is
7 a correct transcription of the answers
8 given by me to the questions therein
9 propounded, except for the corrections or
10 changes in form or substance, if any,
11 noted in the attached Errata Sheet.
12

13
14 Richard T Hoppe MD 7/24/25
15 WITNESS NAME DATE
16

17
18 Subscribed and sworn
19 to before me this

20 _____ day of _____, 20____.

21 My commission expires: _____
22

23 _____
24 Notary Public