

**BEFORE THE UNITED STATES
JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

**IN RE: PARAQUAT
PRODUCTS LIABILITY
LITIGATION**

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§

MDL NO. _____

**PLAINTIFF’S MOTION FOR TRANSFER OF ACTIONS TO THE NORTHERN
DISTRICT OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1407 FOR COORDINATED
OR CONSOLIDATED PRETRIAL PROCEEDINGS**

Movant Paul Rakoczy, Plaintiff in a civil action pending in the United States District Court for the Northern District of California before the Honorable Edward M. Chen,¹ moves this Panel for an order pursuant to 28 U.S.C. § 1407 transferring the actions identified in the attached Schedule of Actions to the Northern District of California for coordinated or consolidated pretrial proceedings, and would respectfully show as follows:

1. This litigation involves the herbicide paraquat, which has been shown to cause Parkinson’s Disease. Movant and plaintiffs listed in the Schedule of Actions have suffered the same injury (Parkinson’s Disease) as a result of exposure to the same toxin (paraquat) and bring the same or substantially similar personal injury causes of action against the same defendants—Chevron U.S.A., Inc., Syngenta Crop Protection L.L.C., and Syngenta AG.

2. Movant proposes transfer to the Honorable Edward M. Chen of the Northern District of California for three reasons. First, Judge Chen has previously shown his ability to successfully resolve multidistrict litigation and repeatedly has been recognized by the Panel as an accomplished jurist skilled at steering multidistrict litigation. Second, Judge Chen currently presides over the lowest-numbered paraquat-related personal injury case out of the five such cases filed in the Northern District of California. Third, Chevron U.S.A. has its principal place of

¹ *Rakoczy v. Syngenta Crop Protection LLC, et al.*, No. 4:21-cv-02083-EMC (N.D. Cal.).

business in the Northern District of California where Judge Chen sits.

3. As indicated in the Schedule of Actions, there are currently fourteen related cases pending in six different federal courts across the country. Transferring these actions to a single court will not only conserve judicial and party resources, but will also avoid the risk of inconsistent pretrial rulings given the number of courts and the complicated common legal and factual issues involved in the cases.

Movant therefore respectfully requests, for these reasons and the ones more fully articulated in the memorandum of authorities filed herewith, that the Panel transfer the cases listed on the attached Schedule of Actions, and any subsequently filed related actions, to Judge Edward Chen of the Northern District of California.

Respectfully Submitted,

/s/ S. Ann Saucer

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