

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) : Michael A. Kelly / Khaldoun Baghdadi 71460 / 190111 Walkup, Melodia, Kelly & Schoenberger 650 California Street, 26th Floor San Francisco, CA 94108 TELEPHONE NO.: 415-981-7210 FAX NO. (Optional): 415-391-6965 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiffs	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Contra Costa STREET ADDRESS: 725 Court Street MAILING ADDRESS: CITY AND ZIP CODE: Martinez, CA 94553 BRANCH NAME:	
PLAINTIFF/PETITIONER: Coordination Proceeding Special Title (Rule 3.550) Paraquat Cases DEFENDANT/RESPONDENT:	
NOTICE OF SETTLEMENT OF ENTIRE CASE	CASE NUMBER: JCCP 5031 JUDGE: Hon. Edward G. Weil DEPT.: 39

NOTICE TO PLAINTIFF OR OTHER PARTY SEEKING RELIEF

You must file a request for dismissal of the entire case within 45 days after the date of the settlement if the settlement is **unconditional**. You must file a dismissal of the entire case within 45 days after the date specified in item 1b below if the settlement is **conditional**. Unless you file a dismissal within the required time or have shown good cause before the time for dismissal has expired why the case should not be dismissed, the court will dismiss the entire case.

To the court, all parties, and any arbitrator or other court-connected ADR neutral involved in this case:

1. This entire case has been settled. The settlement is:
 - a. **Unconditional**. A request for dismissal will be filed within 45 days after the date of the settlement.
Date of settlement:
 - b. **Conditional**. The settlement agreement conditions dismissal of this matter on the satisfactory completion of specified terms that are not to be performed within 45 days of the date of the settlement. A request for dismissal will be filed no later than (date) : **See Attachment 1b**
2. Date initial pleading filed: **Cases Coordinated on July 25, 2019**
3. Next scheduled hearing or conference:
 - a. Purpose: **Case Management Conference**
 - b. (1) Date: **July 7, 2021**
 (2) Time: **8:30 am**
 (3) Department: **39**
4. Trial date:
 - a. No trial date set.
 - b. (1) Date:
 (2) Time:
 (3) Department:

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

Date: **June 18, 2021**

Khaldoun A. Baghdadi
 (TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)

(SIGNATURE)

PLAINTIFF/PETITIONER: Coordination Proceeding Special Title (Rule 3.550) Paraquat Cases DEFENDANT/RESPONDENT:	CASE NUMBER: JCCP 5031
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**PROOF OF SERVICE BY FIRST-CLASS MAIL
 NOTICE OF SETTLEMENT OF ENTIRE CASE**

(NOTE: You cannot serve the Notice of Settlement of Entire Case if you are a party in the action. The person who served the notice must complete this proof of service.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is *(specify)* :

2. I served a copy of the *Notice of Settlement of Entire Case* by enclosing it in a sealed envelope with postage fully prepaid and *(check one)* :

- a. deposited the sealed envelope with the United States Postal Service.
- b. placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Settlement of Entire Case* was mailed:

- a. on *(date)* :
- b. from *(city and state)* :

4. The envelope was addressed and mailed as follows:

- a. Name of person served:
- c. Name of person served:

Street address:

Street address:

City:

City:

State and zip code:

State and zip code:

- b. Name of person served:

- d. Name of person served:

Street address:

Street address:

City:

City:

State and zip code:

State and zip code:

Names and addresses of additional persons served are attached. *(You may use form POS-030(P).)*

5. Number of pages attached _____ .

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

Date:

 (TYPE OR PRINT NAME OF DECLARANT)



 (SIGNATURE OF DECLARANT)

SHORT TITLE: – Paraquat Cases	CASE NUMBER: JCCP 5031
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ATTACHMENT (Number) : 1b

(This Attachment may be used with any Judicial Council form.)

The parties have reached a settlement in the coordinated cases listed below, and expect to file a request for dismissal no later than October 18, 2021. The cases are:

1. BRADFORD PORTER CATHEY v. SYNGENTA AG, et al.,
Contra Costa Superior Court Case No. C19-00666
2. RONALD CHARLES MANSFIELD; CAROLYN MANSFIELD v. SYNGENTA AG, et al.,
Contra Costa Superior Case No. C19-00669
3. KENNETH WALTER REBENS DORF v. SYNGENTA AG, et al.,
Contra Costa Superior Court Case No. C19-00668
4. STEPHEN H. SMITH; KATHLEEN SMITH v. SYNGENTA AG, et al.,
Contra Costa Superior Court Case No. C19-00667
5. CARL DANIEL WATTS; PATRICIA WATTS v. SYNGENTA AG, et al.,
Contra Costa Superior Court Case No. C19-00637
6. JOHN WAYNE CHAMPION; LORETTA CHAMPION v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-19-575011
7. KIRBY ESKELSEN v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-19-575004
8. JOHNNY EDWARD JORDAN; DEANNE S. JORDAN v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-19-575007
9. THOMAS C. LOUDEN; BARBARA LOUDEN v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-19-575010
10. DONALD D. SMITH v. SYNGENTA AG, et al.,
San Francisco Superior Case No. CGC-19-575008
11. DOMINGO GONZALEZ; NONA GEAN GONZALEZ v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-588135
12. DAVID HANSE; BILLIE HANSE v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-588134
13. ROBERT SEE; BONNIE SEE v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-588136
14. ROBERT HAIRE v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-02453
15. MICHAEL MURRAY; BRENDA MURRAY v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-02498
16. JOHN UGASTE v. SYNGENTA AG, et al.,
San Francisco Superior Court Case No. CGC-20-02380

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1
(Add pages as required)

1 **PROOF OF SERVICE**
2 **Coordination Proceeding Special Title (Rule 3.550) - Paraquat Cases**
3 **Case No. JCCP 5031, CIVMS 5031**

4 At the time of service, I was over 18 years of age and not a party to this action.
5 I am employed in the county where the mailing took place. My business address is
6 650 California Street, 26th Floor, City and County of San Francisco, CA 94108-2615.

7 On the date set forth below, I caused to be served true copies of the following
8 document(s) described as:

9 **NOTICE OF SETTLEMENT OF ENTIRE CASE**

10 to:

11 Don Willenburg
12 Robert A. Rich
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15 Oakland, CA 94607

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13 **BY ELECTRONIC SERVICE:** I electronically served the document(s)
14 described above via File & ServeXpress, on the recipients designated on the
Transaction Receipt located on the File & ServeXpress website
15 (<https://secure.fileandservexpress.com>) pursuant to the Court Order establishing the
case website and authorizing service of documents.

16 I declare under penalty of perjury under the laws of the State of California
17 that the foregoing is true and correct.

18 Executed on June 18, 2021, at San Francisco, California.

19
20 
21 _____
Lily Connors