

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In re: PARAQUAT PRODUCTS)
LIABILITY LITIGATION) Case No. 3:21-md-3004-NJR
This Document Relates to all Cases) MDL No. 3004

JOINT STATEMENT OF RELATED CASES AND DESIGNATION OF COUNSEL

Defendants Chevron Phillips Chemical Company LP, Chevron USA, Inc., Syngenta AG, Syngenta Corporation, and Syngenta Crop Protection, LLC,¹ by and through their undersigned attorneys, and Plaintiffs, by and through the undersigned Interim Liaison Counsel for Plaintiffs, hereby jointly submit this Statement of Related Cases and Designation of Counsel pursuant to Case Management Order No. 1. The lists set forth below and attached are based on the best information available to the parties and undersigned counsel as of the date of this filing.

Listing of Related Cases

Attached at Exhibit A is a list of cases currently pending in the federal docket that were filed in this Court, have been transferred to this Court, or are subject to a Conditional Transfer Order to this Court. Attached at Exhibit B is a list of cases currently pending in the federal docket that are related to this matter and appropriate for consolidation within MDL No. 3004. Attached at Exhibit C is a list of cases currently pending in state court dockets that are related to this matter.

¹ By submitting this Joint Statement, Defendants do not waive and expressly reserve all defenses, including to lack of personal jurisdiction and lack of proper service.

Designation of Counsel

Pursuant to Case Management Order No. 1, each Defendant hereby designates one attorney to speak on its behalf during the initial conference:

- Chevron defendants: Leon F. DeJulius, Jr. (“Lee”)
- Syngenta defendants: Ragan Naresh
- Plaintiffs: Sarah Shoemake Doles

Dated: June 22, 2021

Respectfully submitted,

/s/ Sarah Shoemake Doles

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CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2021, I electronically filed this Joint Statement of Related Cases and Designation of Counsel with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to counsel of record. I further certify that on June 22, 2021, a copy of the foregoing was sent via electronic mail to Interested Counsel for the plaintiffs.

Respectfully submitted,

/s/ Sarah Shoemake Doles

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EXHIBIT A

The following cases are currently pending in the federal docket and were filed in this Court, have been transferred to this Court, are subject to a Conditional Transfer Order to this Court, or were directly filed in this MDL:

1. Adams (Carl) v. Syngenta AG, et al., 3:21-cv-02582 (N.D. Cal. 2021)
2. Adams (Charles Wesley) v. Syngenta Crop Protection LLC et al., 3:21-cv-00380 (S.D. Ill. 2021)
3. Adams (Robin) v. Syngenta Crop Protection, LLC, et al., 2:21-cv-00029 (E.D. Mo. 2021)
4. Albanese, et al, v. Syngenta AG, et al., 3:21-cv-02496 (N.D. Cal. 2021)
5. Altman v. Syngenta Crop Protection LLC et al., 3:21-cv-00424 (S.D. Ill. 2021)
6. Amatucci v. Syngenta AG et al., 3:21-cv-03278 (N.D. Cal. 2021)
7. Ayres v. Syngenta Crop Protection LLC, et al., 4:21-cv-03047 (N.D. Cal. 2021)
8. Bankston v. Syngenta Crop Protection, Inc., et al., 3:21-cv-00425 (S.D. Ill. 2021)
9. Barber v. Syngenta Crop Protection, et al., 3:21-cv-00402 (S.D. Ill. 2021)
10. Barr v. Syngenta AG, et al., 3:21-cv-08068 (D. Ariz. 2021)
11. Barrat v. Syngenta Crop Protection LLC, et al., 3:21-cv-50 (N.D.W. Va. 2021)
12. Beshear et al v. Syngenta AG et al, 3:21-pq-00577 (S.D. Ill. 2021)
13. Bishop et al v. Syngenta AG et al, 3:21-pq-00578 (S.D. Ill. 2021)
14. Boldt v. Syngenta AG et al, 3:21-pq-00579 (S.D. Ill. 2021)
15. Branscum (Sheila) v. Syngenta Crop Protection LLC, et al., 3:21-cv-00432 (S.D. Ill. 2021)
16. Branscum (Dorvil) v. Syngenta Crop Protection LLC, et al., 3:21-cv-00431 (S.D. Ill. 2021)
17. Brown Jefferson v. Syngenta AG et al., 3:21-cv-03443 (N.D. Cal. 2021)
18. Burnette v. Syngenta Crop Protection, LLC, et al., 3:21-cv-00373 (S.D. Ill. 2021)
19. Cates v. Syngenta Crop Protection, LLC et al., 0:21-cv-01106 (D. Minn. 2021)
20. Copas, et al., v. Syngenta Crop Protection LLC, et al., 2:21-cv-02013 (E.D. Pa 2021)
21. Crane, et al., v. Syngenta Crop Protection LLC et al., 2:21-cv-01996 (E.D. Pa 2021)

22. Crawford et al v. Syngenta Crop Protection, LLC et al, 3:21-pq-00590 (S.D. Ill. 2021)
23. Denes v. Syngenta AG, et al., 4:21-cv-2416 (N.D. Cal. 2021)
24. Dietrich v. Syngenta Crop Protection LLC et al., 3:21-cv-03048 (N.D. Cal. 2021)
25. Douglas v. Syngenta Crop Protection, Inc., et al., 3:21-cv-00426 (S.D. Ill. 2021)
26. Dove, et al., v. Syngenta AG et al., 3:21-cv-03310 (N. D. Cal. 2021)
27. Durbin v. Syngenta Crop Protection LLC, et al, 3:21-cv-00293 (S.D. Ill. 2021)
28. Edwards v. Syngenta Crop Protection, LLC, et al., 3:21-cv-03488 (N.D. Cal. 2021)
29. Elmore v. Syngenta Crop Protection, LLC, et al., 0:21-cv-01061 (D. Minn. 2021)
30. Firmin v. Syngenta Crop Protection, LLC, et al., 0:21-cv-01110 (D. Minn. 2021)
31. Folse v. Syngenta Crop Protection LLC et al., 2:21-cv-01069 (E.D. La. 2021)
32. Friday, et al., v. Syngenta Crop Protection, LLC, et al., 2:21-cv-02016 (E.D. Pa 2021)
33. Fuller v. Syngenta Crop Protection, LLC, et al., 3:21-cv-00429 (S.D. Ill. 2021)
34. Gaddis v. Syngenta Crop Protection, LLC et al., 0:21-cv-01111 (D. Minn. 2021)
35. Galasso, et al., v. Syngenta AG, et al., 3:21-cv-03305 (N.D. Cal. 2021)
36. Gamwell v. Syngenta Crop Protection LLC, et al., 0:21-cv01063 (D. Minn. 2021)
37. Gieseke v. Syngenta Crop Protection, LLC et al. 3:21-pq-00576 (S.D. Ill. 2021)
38. Glassburn v. Syngenta Crop Protection, LLC, et al., 3:21-cv-03051 (N.D. Cal. 2021)
39. Gray v. Syngenta Crop Protection, LLC, et al., 3:21-cv-00069 (E.D. Ark. 2021)
40. Halloran v. Syngenta Crop Protection, Inc., et al., 3:21-cv-00427 (S.D. Ill. 2021)
41. Hancock v. Syngenta AG et al., 3:21-cv-03424 (N.D. Cal. 2021)
42. Haresnape v. Syngenta Ag, et al., 3:21-cv-02585 (N.D. Cal. 2021)
43. Hawkins v. Syngenta Crop Protection, LLC, et al., 3:21-pq-00635 (S.D. Ill. 2021)
44. Hays v. Syngenta Crop Protection, LLC et al, 2:21-cv-0031 (E.D. Mo. 2021)
45. Hemker, et al., vs. Syngenta Crop Protection LLC, et al, 3:21-cv-00211 (S.D. Ill. 2021)
46. Henderson, et al., v. Syngenta Crop Protection, LLC, et al., 3:21-pq-00636 (S.D. Ill. 2021)

47. Hensgens v. Syngenta AG et al., 3:21-cv-03932 (N.D. Cal. 2021)
48. Hill, et al., v. Syngenta AG et al, 3:21-pq-00580 (S.D. Ill. 2021)
49. Hill (Darian) v. Syngenta Crop Protection, LLC, et al., 3:21-pq-00594 (S.D. Ill. 2021)
50. Holburnet al v. Syngenta AG et al, 3:21-pq-00581 (S.D. Ill. 2021)
51. Holliday v. Syngenta AG et al., 4:21-cv-00137 (S.D. IA 2021)
52. Holmes et al v. Syngenta AG et al, 3:21-pq-00602 (S.D. Ill. 2021)
53. Holmquest et al v. Syngenta AG et al, 3:21-pq-00582 (S.D. Ill. 2021)
54. Holyfield, et al., vs. Chevron U.S.A., Inc., et al., 1:20-cv-00165 (E.D. Mo. 2020)
55. Ingram v. Syngenta AG, et al., 3:21-cv-03650 (N.D. Cal. 2021)
56. Jones v. Syngenta AG et al., 3:21-cv-03409 (N.D. Cal. 2021)
57. Kearns, et al., vs. Syngenta Crop Protection LLC, et al., 3:21-cv-00278 (S.D. Ill. 2021)
58. King, et al., v. Syngenta AG, et al., 3:21-pq-00583 (S.D. Ill. 2021)
59. Kirk v. Syngenta Crop Protection, LLC et al., 0:21-cv-01066 (D. Minn. 2021)
60. Landis v. Syngenta Crop Protection LLC, et al., 5:21-cv-02397 (E.D. PA 2021)
61. Larsen v. Syngenta Crop Protection, LLC et al., 3:21-cv-03049 (N.D. Cal. 2021)
62. Lehman et al v. Syngenta AG et al, 3:21-pq-00585 (S.D. Ill. 2021)
63. Majors v. Syngenta AG, et al., 4:21-CV-02494 (N.D. Cal. 2021)
64. Matheny, et al., v. Syngenta AG, et al., 3:21-pq-00586 (S.D. Ill. 2021)
65. McCarty v. Syngenta Crop Protection LLC, et al., 2:21-cv-00030 (E.D. Mo. 2021)
66. McDonald (William) v. Syngenta Crop Protection LLC et al., 0:21-cv-01068 (D. Minn. 2021)
67. McDonald (Matthew) v. Syngenta Crop Protection LLC et al., 0:21-cv-01065 (D. Minn. 2021)
68. Mettetal v. Syngenta AG, et al., 3:21-cv-02595 (N.D. Cal. 2021)
69. Miller v. Syngenta Crop Protection, LLC et al, 3:21-pq-00591 (S.D. Ill. 2021)
70. Milling et al., v. Syngenta Crop Protection, LLC et al., 4:21-cv-03233 (N.D. Cal. 2021)

71. Moen v. Syngenta Crop Protection, et al., 1:21-cv-00088 (D.N.D. 2021)
72. Morrow (Michael Phillip) v. Syngenta Crop Protection LLC et al., 1:21-cv-00033 (M.D. Tenn. 2021)
73. Moynihan v. Syngenta Crop Protection, LLC, et al., 3:21-cv-00430 (S.D. Ill. 2021)
74. Nelson v. Syngenta AG, et al., 3:21-cv-03670 (N.D. Cal. 2021)
75. Nichols v. Syngenta Crop Protection LLC et al., 1:21-cv-00034 (M.D. Tenn. 2021)
76. Normand v. Syngenta AG et al., 3:21-cv-03929 (N.D. Cal. 2021)
77. Nunnery v. Syngenta AG, et al., 4:21-cv-00047 (N.D. Miss. 2021)
78. O'Connor, et al., v. Syngenta AG, et al., 3:21-cv-2495 (N.D. Cal. 2021)
79. Otten v. Syngenta Crop Protection, LLC, et al., 1:21-cv-00082 (E.D. MO. 2021)
80. Parker, et al., v. Chevron U.S.A., Inc., et al., 2:21-cv-00060 (S.D. Ga. 2021)
81. Parsons v. Syngenta Crop Protection, LLC, et al., 3:21-cv-03229 (N.D. Cal. 2021)
82. Passino, et al., v. Syngenta AG, et al., 3:21-cv-03606 (N.D. Cal. 2021)
83. Pilgreen v. Syngenta Crop Protection, LLC et al., 0:21-cv-01107 (D. Minn. 2021)
84. Piper vs. Syngenta Crop Protection LLC, et al, 3:21-cv-00228 (S.D. Ill. 2021)
85. Pratt v. Syngenta Crop Protection LLC, et al., 3:21-cv-00406 (S.D. Ill. 2021)
86. Rakoczy v. Syngenta Crop Protection LLC, et al., 4:21-cv-02083 (N.D. Cal. 2021)
87. Richmond v. Syngenta Crop Protection LLC, et al., 0:21-cv-01067 (D. Minn. 2021)
88. Richter, et al., v. Syngenta Crop Protection, LLC, et al., 3:21-cv-00571 (S.D. Ill. 2021)
89. Runyon vs. Syngenta Crop Protection LLC, et al., 3:21-cv-00229 (S.D. Ill. 2021)
90. Ruscoe v. Syngenta AG, et al., 4:21-cv-00059 (N.D. Miss. 2021)
91. Rutherford v. Syngenta Crop Protection LLC, et al., 2:21-cv-00611 (N.D. AL 2021)
92. Rysavy v. Syngenta Crop Protection LLC et al., 0:21-cv-01059 (D. Minn. 2021)
93. Self v. Syngenta Crop Protection, LLC, et al., 0:21-cv-01108 (D. Minn. 2021)
94. Shea, et al., v. Syngenta Crop Protection LLC, et al., 3:21-cv-00439 (S.D. Ill. 2021)
95. Smith (Bonnie) v. Syngenta Crop Protection, LLC et al., 0:21-cv-01112 (D. Minn. 2021)

96. Smith (Dale) v. Syngenta Crop Protection LLC, et al., 3:21-cv-03059 (N.D. Cal. 2020)
97. Spriggs v. Syngenta Crop Protection LLC, et al., 1:21-cv-908 (D. Md. 2021)
98. Stanton v. Syngenta Crop Protection, LLC et al., 3:21-cv-00428 (S.D. Ill. 2021)
99. Strickland v. Syngenta Crop Protection, LLC, et al., 1:21-cv-00081 (E.D. Mo. 2021)
100. Supenia v. Syngenta Crop Protection, LLC, et al., 0:21-cv-01062 (D. Minn. 2021)
101. Tackel, et al., v. Syngenta Crop Protection, LLC et al, 3:21-pq-00600 (S.D. Ill. 2021)
102. Tenneson v. Syngenta Crop Protection LLC, et al., 3:21-cv-00231 (W.D. Wis. 2021)
103. Thompson v. Syngenta Crop Protection LLC et al., 1:21-cv-00038 (M.D. Tenn. 2021)
104. Tippey v. Syngenta Crop Protection, et al., 3:21-cv-00397 (S.D. Ill. 2021)
105. Trower v. Syngenta Crop Protection LLC, et al., 0:21-cv-01064 (D. Minn. 2021)
106. Turner v. Syngenta Crop Protection LLC, et al., 2:21-cv-00211 (S.D.W. Va. 2021)
107. Vacchino v. Syngenta AG et al., 4:21-cv-03879 (N.D. Cal. 2021)
108. Van Pelt v. Syngenta AG, et al., 3:21-pq-00608 (S.D. Ill. 2021)
109. Walker v. Syngenta Crop Protection LLC, et al., 1:21-cv-00040 (M.D. Tenn. 2021)
110. Walkington et al v. Syngenta AG et al, 3:21-pq-00601 (S.D. Ill. 2021)
111. Ward v. Syngenta AG, et al., 3:21-cv-02797 (N.D. Cal. 2021)
112. Waters, et al., v. Syngenta AG et al, 3:21-pq-00587 (S.D. Ill. 2021)
113. Werking v. Syngenta AG et al., 3:21-cv-03308 (N.D. Cal. 2021)
114. West v. Syngenta Crop Protection, LLC, et al., 0:21-cv-01109 (D. Minn. 2021)
115. Wilson et al., v. Syngenta Crop Protection, LLC et al., 0:21-cv-01113 (D. Minn. 2021)
116. Wurster v. Syngenta Crop Protection LLC, et al., 4:21-cv-00948 (M.D. PA 2021)

EXHIBIT B

The following cases currently pending in the federal docket are related to this matter:

1. Bergmann v. Syngenta AG et al., 3:21-cv-04137 (N.D. Cal. 2021)
2. Causey v. Syngenta AG, et al., 1:21-cv-01666 (W.D. La.)
3. Fillinghim v. Syngenta AG et al., 3:21-cv-04138 (N.D. Cal. 2021)
4. Hiller v. Syngenta Crop Protection, LLC et al., 3:21-cv-04179 (N.D. Cal. 2021)
5. Morrow (Larry Alan) v. Syngenta Crop Protection LLC et al., 1:21-cv-00042 (M.D. Tenn. 2021)
6. Odom v. Syngenta Crop Protection LLC, et al., 1:21-cv-00208 (S.D. Ala. 2021)
7. Rowan, et al., v. Syngenta AG, et al., 3:21-cv-04529 (N.D. Cal. 2021)
8. Taylor v. Syngenta Crop Protection LLC et al., 1:21-cv-00207 (S.D. Ala. 2021)
9. Thibodeaux et al., v. Syngenta Crop Protection LLC, et al., 6:21-cv-01283 (W.D. La. 2021)
10. Willey v. Syngenta AG et al., 3:21-cv-04140 (N.D. Cal. 2021)

EXHIBIT C

The following cases are pending in state court dockets and are related to this matter:

1. Cathey v. Syngenta AG, et al., Case No. C19-00666 (Superior Court of California, Contra Costa County 2019)
2. Champion, et al., v. Syngenta AG, et al., Case No. CGC-19-575011 (Superior Court of California, San Francisco County 2019)
3. Clasen v. Syngenta AG, et al., Case No. Pending (Superior Court of California, San Francisco County 2021)
4. De la Vega v. Syngenta AG Case No. CIVMSC21-01057 (Superior Court of California, Contra Costa County 2021)
5. Eskelsen v. Syngenta AG, et al., Case No. CGC-19-575004 (Superior Court of California, San Francisco County 2019)
6. Esparza v. Syngenta AG, et al., Case No. Pending (Superior Court of California, San Francisco County 2021)
7. Gonzalezs, et al., v. Syngenta AG, et al., Case No. CGC-20-588135 (Superior Court of California, San Francisco County 2021)
8. Haire. v. Syngenta AG, et al, Case No. C20-02453 (Superior Court of California, Contra Costa County 2021)
9. Hanse, et al., v. Syngenta AG, et al., Case No. CGC-20-588134 (Superior Court of California, San Francisco County 2021)
10. Harker v. Syngenta AG, et al, Case No. CGC-21-589755 (Superior Court of California, San Francisco County 2021)
11. Isaak et al., vs. Syngenta AG et al., Case No. CGC21591254 (Superior Court of California, San Francisco County 2021)
12. James Swoverland, et al., v. Syngenta AG, et al., CGC-21-592365 (Superior Court of California, San Francisco County 2021)
13. John Walker, et al., v. Syngenta AG, et al., Case No. CGC-21-592362 (Superior Court of California, San Francisco County 2021)
14. Jordan, et al., v. Syngenta AG, et al., Case No. CGC-19-575007 (Superior Court of California, San Francisco County 2019)
15. Lombardo v. Syngenta Crop Protection, LLC, et al., Case No. RG21100757 (Superior Court of California, Alameda County 2021)

16. Louden, et al. v. Syngenta AG, et al., Case No. CGC-19-575010 (Superior Court of California, San Francisco County 2019)
17. Mansfield, et al., v. Syngenta AG, et al., Case No. C-19-00669 (Superior Court of California, Contra Costa County 2019)
18. Michael Clark v. Syngenta AG, et al., Case No. CGC-21-592360 (Superior Court of California, San Francisco County 2021)
19. Murray, et al., v. Syngenta AG, et al., Case No. C20-02498 (Superior Court of California, Contra Costa County 2021)
20. Owens v. Syngenta Crop Protection, et al., Case No. CIVMSC21-01187 (Superior Court of California, Contra Costa County 2021)
21. Parker, et al, v. Syngenta Crop Protection LLC, et al., Case No. 21-L-0366 (Circuit Court of St. Clair County, IL 2021)
22. Pulcher, et al., vs. Syngenta AG, et al., Case No. 18-L-828 (Circuit Court of St. Clair County, IL 2018)
23. Rebensdorf v. Syngenta AG, et al., Case No. C19-00668 (Superior Court of California, Contra Costa County 2019)
24. See, et al., v. Syngenta AG, et al., Case No. CGC-20-588136 (Superior Court of California, San Francisco County 2019)
25. Smith (Dennis), et al., v. Syngenta AG, et al., Case No. C19-00668 (Superior Court of California, San Francisco County 2019)
26. Smith (Stephen), et al., v. Syngenta AG, et al., Case No. C19-00668 (Superior Court of California, San Francisco County 2019)
27. Sorgenfrey Terry v. Syngenta Crop Protection Case No. 2021-L-005210 (Circuit Court of Cook County, Illinois 2021)
28. Ugaste v. Syngenta AG, et al, Case No. C20-02380 (Superior Court of California, Contra Costa County 2021)
29. Watts, et al., v. Syngenta AG, et al., Case No. C19-00637 (Superior Court of California, Contra Costa County 2019)
30. Wendland v. Syngenta AG, et al., Case No. Pending (Superior Court of California, San Francisco County 2021)
31. Wendler et al., vs. Syngenta Crop Protection LLC, et al, Case No. 18-L-0805 (Circuit Court of St. Clair County, IL 2018)