

**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**

**MDL No. 3004**

**This Document Relates to All Cases**

**JOINT MOTION TO ESTABLISH A QUALIFIED SETTLEMENT FUND**

Plaintiffs in these consolidated proceedings, together with Defendants Syngenta Crop Protection, LLC, Syngenta AG, and Chevron U.S.A. Inc. (“Defendants”) (together “the Parties”), jointly move for an order to establish the Paraquat Products Qualified Settlement Fund (the “Paraquat Products QSF” or “QSF”) in accordance with Section 468B of the Internal Revenue Code, the Treasury Regulations promulgated thereunder, and such administrative announcements, notices, and information releases as shall be published by the Internal Revenue Service from time to time.

1. MDL Plaintiffs’ Co-Lead Counsel, as appointed by the MDL Court most recently in CMO 22, and Defendants have reached an agreement in principle that, subject to certain conditions and acceptance by individual Plaintiffs, will resolve certain Claims or Actions against Defendants related to the development of Parkinson’s disease allegedly resulting from Claimants’ exposure to Paraquat Products. The agreement has been memorialized in a signed, confidential Settlement Agreement dated August 4, 2025 (the “Settlement Agreement”).

2. Section III of the Settlement Agreement contemplates that a Qualified Settlement Fund will be established and ordered by the MDL Court and will be used to satisfy and cover the individual settlement amounts.

3. The Parties respectfully request that the Court establish a Paraquat Products QSF within the meaning of Section 1.468B-1 of the Treasury Regulations, promulgated under the Internal Revenue Code and applicable regulations. The QSF shall receive the settlement funds to be paid by Defendants pursuant to the Settlement Agreement and on the terms specified in the Settlement Agreement. The QSF will satisfy the requirements of Treasury Regulation Section 1.468B-1 because:

- a. It will be established pursuant to this Court's order and approval;
- b. It will remain subject to the continuing jurisdiction of the Court; and
- c. The Parties agree that the QSF will assist them in resolving or satisfying one or more claims asserted in the litigation by facilitating the collection, disbursement, and accounting of settlement funds.

The Court's approval and order establishing the Paraquat Products QSF will serve the interests of the Parties because it will facilitate payment of the settlement funds consistent with the Settlement Agreement. The Parties agree that Defendants have no responsibility for the expenses or administration of the QSF and will have no liability to the Settling Claimants in connection with QSF administration or decisions made by the QSF Administrator or MDL Plaintiffs' Co-Lead Counsel.

4. The settlement funds received by the QSF are the sole property of the QSF, and no portion of the settlement funds shall be made available to Settling Claimants except as specifically provided in the Settlement Agreement and shall not be disbursed except as provided in the Settlement Agreement.

5. The Parties hereby request that the Court approve the appointment of Huntington National Bank (HNB), a federally insured depository institution, to serve as custodian of the funds in the QSF (the “Custodian”).

6. MDL Plaintiffs’ Co-Lead Counsel have retained BrownGreer PLC (“BrownGreer”) to serve as the QSF Administrator. The Parties agree that all fees and expenses associated with the QSF Administrator, and the establishment and maintenance of the escrow and QSF accounts to hold the settlement funds, will be borne by the Claimants who accept their Individual Settlement Offers and execute Releases in good order and Stipulations for Dismissal With Prejudice pursuant to the Settlement Agreement (the “Settling Claimants”) and their counsel, consistent with applicable state Rules of Professional Conduct. These fees and expenses may be paid by or reimbursed from the settlement funds deposited into the QSF and will not be the Defendants’ responsibility.

7. Upon the final distribution of all monies to be paid into the QSF, the QSF Administrator shall take appropriate steps to wind down the QSF and thereafter be discharged from any further responsibility with respect to the QSF. Upon completion, the QSF Administrator shall not be required to obtain a court order to close the custodial account.

8. The QSF Administrator shall obtain a Federal Taxpayer Identification Number for the QSF upon the execution of an order by the Court establishing the QSF.

WHEREFORE, the Parties respectfully request that this Court enter an order:

- (1) Establishing the Paraquat Products QSF within the meaning of Section 1.468B-1 of the Treasury Regulations;
- (2) Appointing Huntington National Bank (HNB) as Custodian of the Paraquat Products QSF;

- (3) Appointing BrownGreer as the Paraquat Products QSF Administrator pursuant to the terms, conditions, and restrictions of this Motion and the Settlement Agreement; and
- (4) Granting the Paraquat Products QSF Administrator the authority to conduct any and all activities necessary to administer this QSF as set forth in this Motion and the Settlement Agreement.

Dated: February 27, 2026

Respectfully submitted,

/s/ Sarah Shoemake Doles  
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***Counsel for Defendant Chevron U.S.A., Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on February 27, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to counsel of record.

*/s/ Sarah Shoemake Doles*  
Sarah Shoemake Doles