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

IN RE: PARAQUAT PRODUCTS LIABILITY LITIGATION, This Document Relates to: ALL CASES	Case No.: 3:21-MD-03004-NJR MDL No. 3004 Chief Judge Nancy J. Rosenstengel

STIPULATION
REGARDING PROPER PARTIES

Plaintiffs and Defendant CHEVRON U.S.A. INC., by and through their undersigned attorneys, stipulate and agree that:

Dismissal of non-Chevron U.S.A. Inc. Entities

1. Defendant, through counsel who has appeared in this proceeding, has represented to Plaintiffs, and hereby represents to the Court, that during the year 2000, Chevron U.S.A. Inc. expressly assumed all liabilities of Chevron Chemical Company LP and Chevron Chemical Company arising from their paraquat business activities, including alleged activities of design, registration, manufacture, formulation, testing, packaging, labeling, distribution, and/or sale of paraquat products in the United States.[1] Chevron U.S.A. Inc. further represented to Plaintiffs, and hereby represents to the Court, that Chevron Phillips Chemical Company LP and Chevron Phillips Chemical Company

[1] By entering into this stipulation Chevron U.S.A. Inc. does not admit liability for any claims asserted by Plaintiffs. Rather, Chevron U.S.A. Inc. denies liability as to all claims asserted by Plaintiffs.

LLC (collectively "CP Chem"), Phillips 66, Phillips 66 Company (collectively "Phillips 66"), and Chevron Corporation hold no liability for the above-listed activities with respect to paraquat; rather, Chevron U.S.A. Inc. is the proper party relating to allegations involving the above-listed activities with respect to paraquat.

2. Defendant Chevron U.S.A. Inc. has further represented to Plaintiffs, and hereby represents to the Court, that Chevron Chemical Company terminated its paraquat business activities in 1986, specifically including but not limited to distribution of paraquat in the United States, and transferred away all relevant registrations for the products.

3. In this coordinated and consolidated proceeding, certain plaintiffs filed their complaints naming not only Chevron U.S.A. Inc., but also one or more of the above-listed defendants (see Appendix A). Regarding CP Chem, these plaintiffs either allege in some form that Chevron Phillips Chemical Company LP is a successor by merger or continuation of business to Chevron Chemical Company LLC, which in turn is a successor by merger or continuation of business to Chevron Chemical Company, or, in some member cases, do not allege any connection to Chevron Chemical Company or the paraquat business. Regarding Chevron Corporation and Phillips 66, these complaints do not contain allegations of any connection to Chevron Chemical Company or the paraquat business.

4. Plaintiffs' Co-Lead Counsel and Chevron U.S.A. Inc. agree that CP Chem, Chevron Corporation, and Phillips 66 should be dismissed without prejudice as defendants in the member cases described in Paragraph 3.

Dismissal of Claims Alleging Paraquat Exposure Beginning 1990 or Later

5. Chevron Chemical Company (whose liabilities Chevron U.S.A. Inc. has assumed, as detailed above) stopped distributing paraquat in 1986 and transferred all paraquat registrations held by Chevron to a non-Chevron entity at that time. In this coordinated and consolidated proceeding, certain plaintiffs assert causes of action against Chevron U.S.A. Inc. based on alleged exposure to a paraquat product beginning in 1990 or later (see Appendix B). These plaintiffs do not allege facts providing a basis for liability of Chevron U.S.A. Inc. for exposures beginning in 1990 or later; some explicitly allege and acknowledge that Chevron U.S.A. Inc. distributed paraquat only through 1986.

6. Plaintiffs' Co-Lead Counsel and Chevron U.S.A. Inc. agree that Chevron U.S.A. Inc. should be dismissed without prejudice as a defendant in the member cases described in Paragraph 5.[2]

[2] Chevron U.S.A. Inc. expressly denies liability for any claims alleging exposure beginning after 1986; nothing in this Stipulation prevents Chevron U.S.A. Inc. from seeking dismissal of cases that allege exposure to paraquat beginning after 1986.

Respectfully submitted,

By: */s/ Megan Scheiderer*

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Plaintiffs' Co-Lead Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 29, 2021, the foregoing was filed electronically with the Clerk of the Court for the United States District Court for the Southern District of Illinois, and was served by operation of that Court's electronic filing system, upon all counsel of record entered in this matter.

/s/ *Megan Scheiderer*
Megan Scheiderer, #06329211
Counsel for Chevron U.S.A. Inc.

APPENDIX A

Title	Case Number	Opposing Counsel	Chevron Entities Named
Durbin, Stephen	3:21-pq-00551	Carey Danis & Lowe / Andrus Wagstaff	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Atha, Terry	3:21-pq-00736	Cory Watson, P.C.	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Demenezes, Edward	3:21-pq-00871	Cory Watson, P.C.	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Johnson, Kenneth	3:21-pq-00870	Cory Watson, P.C.	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Marsh, Larry	3:21-pq-00729	Cory Watson, P.C.	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Zaugg, Neil	3:21-pq-00694	Environmental Litigation Group, P.C. / Law Office of Christopher Cueto, LTD.	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Cates, Marvin	3:21-pq-00646	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Elmore, Billy	3:21-pq-00638	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Firmin, Don	3:21-pq-00651	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Gaddis, Audie	3:21-pq-00653	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Gamwell, David	3:21-pq-00640	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Kirk, Paul	3:21-pq-00643	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
McDonald, Matthew	3:21-pq-00642	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
McDonald, William	3:21-pq-00645	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Pilgreen, Joan	3:21-pq-00648	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Richmond, Robert	3:21-pq-00644	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Self, Mickey	3:21-pq-00649	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Smith, Bonnie	3:21-pq-00654	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Supenia, Brian	3:21-pq-00639	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Trower, Mary	3:21-pq-00641	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
West, Harold	3:21-pq-00650	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Wilson, Joe	3:21-pq-00655	Gustafson Gluek PLLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Aleck, John	3:21-pq-00723	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Bartel, LeWayne	3:21-pq-00724	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Bonnett, Roy	3:21-pq-00739	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Bynes, Eugene	3:21-pq-00789	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Carpenter, Landon	3:21-pq-00765	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Frank, David	3:21-pq-00744	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Hansrote, Roger	3:21-pq-00740	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Jensen, Mark	3:21-pq-00726	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Lewis, Steven	3:21-pq-00754	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Priewe, David	3:21-pq-00737	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Rufener, Carl	3:21-pq-00721	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Sorrells, Jimmy	3:21-pq-00764	Lockridge Grindal Nauen P.L.L.P.	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Meers, Milton	3:21-pq-00718	Lockridge Grindal Nauen P.L.L.P. / Fibich Leebron Copeland Briggs	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Rysavy, Joseph	3:21-pq-00659	Lockridge Grindal Nauen P.L.L.P. / Zimmerman Reed	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Henry, Suzanne	2:21-cv-01600	Martzell Bickford & Centola	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Nunnery, John	3:21-pq-00607	McCulley McCluer LLC / Ashcraft & Gerel	Chevron Corporation; Phillips 66; Chevron U.S.A. Inc.; Phillips 66 Company; Chevron Phillips Chemical Company LLC; Chevron Phillips Chemical Company LP
Ruscoe, Ann	3:21-pq-00609	McCulley McCluer LLC / Ashcraft & Gerel, LLP	Chevron Corporation; Phillips 66; Chevron U.S.A. Inc.; Phillips 66 Company; Chevron Phillips Chemical Company LLC; Chevron Phillips Chemical Company LP
Folse, Emile	3:21-pq-00673	Morris Bart LLC	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Robinson, James	3:21-pq-01165	Seidman Margulis & Fairman, LLP	Chevron U.S.A. Inc.; Chevron Phillips Chemical Company LP
Gieseke, Terry	3:21-pq-00576	The Gori Law Firm	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.
Willyard, Richard	3:21-pq-00715	Wexler Wallace LLP	Chevron Phillips Chemical Company LP; Chevron U.S.A. Inc.

Appendix B

Title	Case Number	Opposing Counsel
Acosta, Luis and Martha	3:21-pq-01151	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Altman, Virginia	3:21-pq-00832	Korein Tillery LLC / Watts Guerra LLC
Bair, Gary	3:21-pq-01028	Fears Nachawati, PLLC
Batoczki, Laszlo	3:21-pq-00987	Fears Nachawati, PLLC
Biderman, James and Marilyn Jean	3:21-pq-01130	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Boldt, Greg	3:21-pq-00579	The Miller Firm, LLC
Boyd, Gerald	3:21-pq-01018	Fears Nachawati, PLLC
Branscum, Dorvil	3:21-pq-00838	Korein Tillery LLC / Watts Guerra LLC
Branscum, Sheila	3:21-pq-00839	Korein Tillery LLC / Watts Guerra LLC
Brown Jefferson, Mesa and Velma Brown	3:21-pq-00632	Andrus Wagstaff, PC / TorHoerman Law LLC
Brown, Ronald	3:21-pq-01355	Schlichter Bogard & Denton, LLP
Canevari, Diane	3:21-pq-01094	Fears Nachawati, PLLC
Carroll, Faron	3:21-pq-01306	Fears Nachawati, PLLC
Cassman, Amber	3:21-pq-00962	Fears Nachawati, PLLC
Douglas, Franklin	3:21-pq-00833	Korein Tillery LLC / Watts Guerra LLC
Downard, Troy and Michelle	3:21-pq-01090	Wright & Schulte, LLC
Doyle, Audrey	3:21-pq-01311	Fears Nachawati, PLLC
Duran, Joseph	3:21-pq-00984	Fears Nachawati, PLLC
Esbayhat, Omar	3:21-pq-01011	Fears Nachawati, PLLC
Gamwell, David	3:21-pq-00640	Gustafson Gluek PLLC
Gieseke, Terry	3:21-pq-00576	The Gori Law Firm
Hill, Darian	3:21-pq-00594	Watts Guerra LLC / Baron and Blue PLLC / Keller Lenkner
Holliday, Doug, individually and on behalf of all others	3:21-pq-00604	Shindler, Anderson, Goplerud & Weese, P.C. / Fegan Scott LLC
Hunter, Bobbye and Jim	3:21-pq-01321	Fears Nachawati, PLLC
Ingram, Darren	3:21-pq-00663	Motley Rice, LLC
Jelneck, Larry	3:21-pq-00996	Fears Nachawati, PLLC
Jimenez, Richard	3:21-pq-00986	Fears Nachawati, PLLC
Johnson, Kenneth	3:21-pq-00870	Cory Watson, P.C.
Johnston, Crystal	3:21-pq-00746	Johnson Law Group
King, Gayle	3:21-pq-00583	The Miller Firm, LLC
Lively, Thomas and Barbara	3:21-pq-01322	Fears Nachawati, PLLC
McClellan, Billy and Leslie	3:21-pq-01015	Fears Nachawati, PLLC
McDonald, Matthew	3:21-pq-00642	Gustafson Gluek PLLC
McDonald, William	3:21-pq-00645	Gustafson Gluek PLLC
McNabb, William	3:21-pq-00994	Fears Nachawati, PLLC
Moen, Jodie	3:21-pq-00605	Fears Nachawati
Nelson, Joseph	3:21-pq-00662	Motley Rice, LLC
Normand, Thomas Keith	3:21-pq-01333	Herman, Herman & Katz, LLC / Arias Sanguinetti Wang & Torrijos LLP / Sangisetty Law Firm, LLC
Perkins, Larry Wayne	3:21-pq-01032	OnderLaw, LLC
Pilgreen, Joan	3:21-pq-00648	Gustafson Gluek PLLC
Powrie, Charles	3:21-pq-00710	The Smith Law Firm, PLLC / Shenaq, PC / Law Offices of Ezequiel Reyna, Jr., P.C.
Putnam, Dennis	3:21-pq-00874	Watts Guerra LLC
Rakoczy, Paul	3:21-pq-00554	Fears Nachawati
Ratliff, Randall	3:21-pq-01113	Fears Nachawati, PLLC
Sadler, Donna	3:21-pq-00938	Fears Nachawati, PLLC
Sadrzadeh-Rafie, Ali and Sedigheh Sadrzadeh	3:21-pq-01269	Fears Nachawati, PLLC
Simmons, Burnell	3:21-pq-01112	Fears Nachawati, PLLC
Smith, Cheryl	3:21-pq-00936	Fears Nachawati, PLLC
Sparks, Harry	3:21-pq-01323	Fears Nachawati, PLLC
Spence, Bruce	3:21-pq-00949	Fears Nachawati, PLLC
Stringer, Cristina	3:21-pq-01285	Fears Nachawati, PLLC
Swogger, David	3:21-pq-00950	Fears Nachawati, PLLC
Synhorst, Don and Cinda	3:21-pq-01184	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Thomas, J.W.	3:21-pq-00674	Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey / Weisman, Kennedy & Berris
Thrasher, Jonathan	3:21-pq-00943	Fears Nachawati, PLLC
Turner, Kenneth	3:21-pq-00558	Warner Law Office / Fears Nachawati
Vacchino, Linda	3:21-pq-00623	Weitz & Luxenberg, PC
Valdez, Cassandra	3:21-pq-00974	Fears Nachawati, PLLC
Washington, Johnnie Jr. and Wanda	3:21-pq-01138	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Waters, Michael	3:21-pq-00587	The Miller Firm, LLC
Wetherholt, Ron and Mary	3:21-pq-01196	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.
Woody, William	3:21-pq-00939	Fears Nachawati, PLLC
Yates, William	3:21-pq-01139	Beasley, Allen, Crow, Methvin, Portis & Miles, P.C.