

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

AMENDED PROTOCOL
FOR THE SELECTION OF TRIAL CASES

ROSENSTENGEL, Chief Judge:

Under Case Management Order 12 Protocol for the Selection of Trial Cases, limited fact discovery for the 16 selected trial cases shall be completed by March 31, 2022. (Doc. 587). To further assist the Court in selecting cases for trial, the parties¹ are **DIRECTED** to rank the 16 cases **in order of preference** and provide the Court with a report, not to exceed **one-page** on each case, to include the following information:

- Undisputed and disputed facts of the case;
- Whether the case is a “representative” case, as well as reasons why and why not;
- Progression of the case to date, included discovery completed and needed; and
- Position on why this case should – or perhaps should not – be selected for trial.

The parties shall submit the required information to the Court – confidentially and

¹ Defendants, Syngenta and Chevron, may submit joint or separate responses, depending on their positions.

ex parte – for *in camera* review via email at paraquatMDL@ilsd.uscourts.gov on or before 5 p.m. (Central Time) on **April 8, 2022**.

The Court further **AMENDS** the fact and expert discovery deadlines in Case Management Order No. 12 as follows:

	Deadline
Parties to complete Plaintiffs’ depositions	3/31/2022
Parties to provide <i>in camera</i> ranking of all 16 trial cases	4/8/2022
Court to select cases for full work up	4/15/2022
Parties to disclose additional fact witnesses in cases selected for full work up	4/22/2022
Parties to complete fact discovery and medical examinations in cases selected for full work up	5/16/2022
Plaintiffs’ general and specific expert disclosures	5/26/2022
Defendants to complete depositions of Plaintiffs’ experts	6/30/2022
Defendants’ expert disclosures	7/7/2022
Plaintiffs to complete depositions of Defendants’ experts	8/11/2022
Plaintiffs’ rebuttal expert disclosures	8/15/2022
Defendants to complete deposition of Plaintiffs’ rebuttal experts	9/2/2022

IT IS SO ORDERED.

DATED: March 7, 2022



NANCY J. ROSENSTENGEL
Chief U.S. District Judge