

Exhibit 3: Production Requirements for Recent Use Plaintiffs

1. Documents sufficient to show that Plaintiff personally purchased and/or used paraquat in a brand manufactured by Defendants during the Recent Use Years. If Plaintiff alleges use of paraquat at a farm that they owned, documents sufficient to show that their farm purchased and used paraquat.

a. Documents establishing a restricted use pesticide license *alone* will not be considered to satisfy this paragraph. An affidavit attesting that the Plaintiff personally used paraquat also will *alone* not be considered to satisfy this paragraph.

b. Documents establishing that Plaintiff's employer purchased or used paraquat will not be considered documents establishing proof of purchase or use of paraquat by Plaintiff. If Plaintiff alleges personal use of paraquat while working for an employer, Plaintiff must produce both documents establishing that their employer purchased a brand of paraquat manufactured by Defendants and either documents establishing that Plaintiff personally used such paraquat or an affidavit from a representative of the employer attesting based on personal knowledge that Plaintiff personally used such paraquat.

2. Documents sufficient to show that (a) Plaintiff had a restricted use pesticide license for the Recent Use Years; and (b) for any person identified in the PFS under whose supervision paraquat was allegedly used, such person had a restricted use pesticide license for the Recent Use Years. Plaintiffs who allege use of paraquat after 2019 should

also produce all certifications of completion of the EPA-approved paraquat-specific training.

3. All Plaintiffs who allege claims against one or more in-state defendant(s) (in addition to Syngenta and Chevron) shall produce documents sufficient to show that Plaintiff purchased or used paraquat from each in-state defendant(s).