Exhibit 4: Production Requirements for Intermediate Use Plaintiffs

All Intermediate Use Plaintiffs shall produce the following:

1. Documents sufficient to show that Plaintiff personally purchased and/or used paraquat in a brand manufactured by Defendants during the Intermediate Use Years.

2. If such documents do not exist or cannot be obtained, Plaintiffs shall produce a detailed affidavit from a non-family member sufficient to show that Plaintiff used paraquat during the Intermediate Use Years. The affidavit shall contain the information described in Section II(C). The affidavit must be signed under penalty of perjury.

3. Plaintiffs shall also produce documents sufficient to corroborate the affidavit, including:

   a. Documents sufficient to show that during the alleged use, any relevant employer was in operation and employed Plaintiff.

   b. Documents sufficient to show that during the alleged use, any relevant farm was in operation and to show the location of the farm.

   c. Documents sufficient to show that during the alleged use, any relevant paraquat seller was in operation and sold paraquat manufactured by the Defendants.

   d. All such licensing and training documents as described in Exhibit 3.

4. All Plaintiffs who allege claims against one or more in-state defendant(s) (in addition to Syngenta and Chevron) shall produce documents as described in Exhibit 3.

If Plaintiff has no such documents, Plaintiff shall produce a detailed affidavit from a representative of each in-state defendant. The affidavit shall state whether Plaintiff purchased or used paraquat from in-state defendant. Plaintiff shall also produce documents sufficient to show that during the alleged use, the seller was in operation and sold paraquat manufactured by the Defendants.