

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT**

No. 24-1865 (consolidated with Nos. 24-1866, 24-1867, & 24-1868)

In re: PARAQUAT PRODUCTS
LIABILITY LITIGATION

FREDERICK L. RICHTER, ET AL.,)	On Appeal from the United States
)	District Court for the Southern
Plaintiffs-Appellants,)	District of Illinois (East St. Louis)
)	
v.)	Nos. 3:21-md-30004-NJR, 3:21-
)	pq-571-NJR, 3:21-pq-1218-NJR,
SYNGENTA CROP PROTECTION,)	3:21-pq-1560-NJR, & 3:21-pq-
LLC, SYNGENTA AG, CHEVRON)	836-NJR
U.S.A. INC.,)	
)	Hon. Judge Nancy J. Rosenstengel
Defendants-Appellees.)	

JOINT MOTION TO HOLD APPEAL IN ABEYANCE

The parties in the above-captioned consolidated appeal—Plaintiffs-Appellants Frederick L. Richter, Karen Richter, Todd Burgener, Sarah Coward, as personal representative of the Estate of Matthew G. Coward, Keith Fuller, and Diane Fuller, and Defendants-Appellees Syngenta Crop Protection, LLC, Syngenta AG, and Chevron U.S.A Inc.—jointly move the Court to hold this appeal in abeyance.

On April 14, 2025, lead counsel for Plaintiffs and Defendants in the *In re Paraquat Products Liability Litigation* MDL entered into a signed Letter Agreement that is intended to resolve this case and many others in the underlying MDL

proceedings and, therefore, could obviate the need for this Court to resolve this appeal. Holding this case in abeyance therefore serves the interests of judicial economy. Furthermore, the District Court does not object to the stay of this appeal.

Accordingly, the parties respectfully request that the appeal be held in abeyance, and propose submitting a joint status report to the Court 60 days following the entry of this Court's stay order. In due course, the parties will move the Court either to dismiss the appeal or lift the stay.

/s Andrianna D. Kastanek
Andrianna D. Kastanek (Counsel of
Record)
Gabriel K. Gillett
JENNER & BLOCK LLP
353 North Clark Street
Chicago, IL
(312) 222-9350
akastanek@jenner.com
ggillett@jenner.com

Counsel for Plaintiffs-Appellants

Respectfully submitted,

s/John C. O'Quinn
John C. O'Quinn (Counsel of Record)
Ragan Naresh
KIRKLAND & ELLIS LLP
1301 Pennsylvania Avenue N.W.
Washington, D.C. 20004
(202) 389-3205
john.oquinn@kirkland.com

Leon F. DeJulius, Jr. (Counsel of
Record)
Sharyl A. Reisman
JONES DAY
250 Vesey Street
New York, NY 10281
(212) 326-3939
lfdejulius@jonesday.com

David J. Feder
JONES DAY
555 S. Flower St., 50th Fl.
Los Angeles, CA 90071

Counsel for Defendants-Appellee

April 14, 2025

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

s/ John C. O'Quinn
John C. O'Quinn