

VOLUME: I
PAGES: 1-280
EXHIBITS: 1-17

IN THE CIRCUIT COURT OF THE THIRTEENTH
JUDICIAL CIRCUIT IN AND FOR
HILLSBOROUGH COUNTY, FLORIDA
CIVIL DIVISION
CASE NO. 21-CA-006219

ALLAN WILLIFORD, and LYNDIA WILLIFORD,)
Plaintiff,)
vs.)
SYNGENTA CROP PROTECTION, LLC,)
CHEVRON U.S.A. INC., COUNCIL-OXFORD,)
INC.,)
Defendants.)

DEPOSITION OF DAVID A. SAVITZ,
PhD, called as a witness by and on behalf of the
Plaintiffs, pursuant to the applicable provisions
of the Florida Rules of Civil Procedure, before P.
Jodi Ohnemus (remotely), RPR, RMR, CRR, CA-CSR
#13192, NH-LCR #91, MA-CSR #123193, and Notary
Public, within and for the Commonwealth of
Massachusetts, at Kirkland & Ellis, LLP, 200
Clarendon Street, Boston, Massachusetts, on Friday,
June 23, 2023, commencing at 8:44 a.m.

1 phrasing "we cannot completely rule out," that I --
2 that's pretty hard to argue with.

3 Q. And I just -- and one last exhibit. It's
4 tab 39.

5 MR. SAMPSON: We're on Exhibit 17.
6 (Exhibit 17, Epidemiologic Studies
7 Program, William F. Serat, PhD,
8 CUSA-00318507-553.)

9 MR. TRAVERS: We'll mark this as Exhibit
10 17.

11 Q. And -- and this -- and this document was
12 on your reliance list. Does this have any
13 relevance to your opinion in this case?

14 MR. SAMPSON: Objection to form.

15 A. No. I mean, again, in the overall -- I
16 mean, there's -- there's, you know, tidbits of
17 inference and so on, you know, that were available
18 at this time, but in any sort of weighting of
19 evidence, this drops by the wayside. It's --
20 it's -- the evidence that's accrued in more modern
21 times is -- is simply more informative about the --
22 the question of the epidemiologic evidence
23 regarding paraquat and Parkinson's.

24 So, no, I would not put weight on this.

25 Q. And could you ever -- if a student came up

1 to you with a study design where they would follow
2 50 paraquat users and 50 nonparaquat users to try
3 to determine whether paraquat increases the risk of
4 Parkinson's disease, what would you tell that
5 student?

6 MR. SAMPSON: Objection. Form.

7 A. Simply that if you don't have adequate
8 numbers, you can't possibly address the issue.
9 Paraquat -- I mean, Parkinson's disease is a
10 relatively infrequent disease; and, you know,
11 projecting forward, it's not going to be helpful.
12 There may be other questions it can answer, that if
13 it's --

14 Q. Yeah.

15 A. -- you know, if it's looking at acute
16 symptoms, if it's looking at biomarkers, if it's --
17 you know, of course that's fine, but when it's
18 looking at something that's relatively infrequent
19 and thought to be delayed, you need either
20 bigger -- you need bigger numbers and a longer
21 time.

22 MR. TRAVERS: All right. That's all the
23 questions I've got for you. And thank you -- thank
24 you very much.

25 THE WITNESS: Sure. Thank you.