

1 IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
2 IN AND FOR HILLSBOROUGH COUNTY, FLORIDA
3 CASE NO.: 21-CA-006219

4 ALLEN WILLIFORD, and LYNDA WILLIFORD,
5 Plaintiff,

6 vs.

7 SYNGENTA CROP PROTECTION, LLC, and COUNCIL-OXFORD,
8 INC.,
9 Defendants.

10 _____/

11 VIDEO-RECORDED DEPOSITION OF JASON RICHARDSON, Ph.D.

12 Monday, April 17, 2023
13 9:18 a.m. - 5:41 p.m.

14
15 Residence Inn by Marriott
16 Miami Beach Surfside
17 9200 Collins Avenue
18 Surfside, Florida 33154

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24 Stenographically Reported By:
25 Barbie Gallo, RMR-CRR
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1 A. Hypothetically, yes, it's possible.

2 BY MS. CRAMER:

3 Q. Okay. And that's why dose plus time is the
4 most important thing to consider when it comes to
5 toxicology, right?

6 A. It's all in there together.

7 Q. Now, in the animal studies, so leaving aside
8 epidemiology for a second --

9 A. Sure.

10 Q. -- in the animal studies you have no
11 evidence that a lower dose of paraquat, something below
12 1 mg/kg, can invoke a PD like pathology?

13 MS. FORGIE: Objection. Mischaracterizes
14 testimony.

15 You can answer.

16 A. Based on the studies in the literature that
17 I gave significant weight to, that, to the best of my
18 knowledge, is the lowest dose that I saw in that.
19 That's also at that 1 milligram per kilogram dose there
20 was still significant loss of dopamine neuron, so we
21 don't know if that's the floor or not. I haven't seen
22 lower doses used with that in using unbiased stereology
23 in getting dopamine neurons.

24 BY MS. CRAMER:

25 Q. So we don't know what happens if mice, for