

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

DIANA HOFFMANN,)
individually and as)
Independent Administrator)
of the Estate of THOMAS R.) No. 17-L-517
HOFFMANN, Deceased, et al.,)
)
Plaintiff,)
)
v.)
)
SYNGENTA CROP PROTECTION,)
LLC, et al.,)
)
Defendants.)

- - - -

CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER

VIDEOTAPED ZOOM DEPOSITION OF
SYNGENTA CROP PROTECTION, LLC

PHILIP BOTHAM
(Volume IV - pages 835-1119 inclusive)

Thursday, June 18, 2020

Berkshire, England,
United Kingdom
(Deponent's location)

Reported by:
LEAH M. WILLERSDORF,
(AVR, MBIVR No. 166,
QRR2, International
Participating Member NCRA.)

Job No. 27627

1 safe to farmers and their families? What is
2 the safety of paraquat to farmers from use long
3 term? And one of them is, Does paraquat cause
4 Parkinson's disease?

5 Doesn't it? Right?

6 A. Yes.

7 Q. And the answer that was given was,
8 and I'm quoting now:

9 "There is no scientific or reliable
10 epidemiological evidence so far to link
11 paraquat with Parkinson's Disease. Previous
12 studies have demonstrated that paraquat
13 does not cross the blood-brain barrier easily,
14 meaning that it does not reach the specific
15 location in the brain necessary to produce
16 Parkinson's symptoms. Epidemiology studies in
17 areas of high and long-term paraquat usage have
18 shown no increase of neurotoxic incidents."

19 Do you see that?

20 A. Yes, I see that.

21 Q. Was that correct on January 18,
22 2018 -- 2008, sorry?

23 A. I think in 2008 that certainly had
24 some inaccuracies, I would agree. So, as
25 I said earlier, it appears that this

1 communication had not had a chance, for
2 reasons which I can't fully explain, to catch
3 up with the science that was still emerging.

4 Q. Why was Syngenta telling the public
5 that paraquat does not cross the blood-brain
6 barrier, while acknowledging internally that
7 paraquat does cross the blood-brain barrier?

8 MR. NARESH: Object to the form.

9 THE WITNESS: I'm afraid I can't
10 answer that. I don't -- I honestly don't
11 know why that was still on paraquat.com
12 at that time.

13 BY MR. TILLERY:

14 Q. Why was Syngenta telling the public
15 that paraquat does not reach the place in the
16 brain related to Parkinson's symptoms?

17 A. Again, I can't answer that.
18 I don't know how that --

19 THE STENOGRAPHER: Sorry,
20 Mr. Naresh, I saw your lips move but
21 I didn't hear you. Sorry.

22 THE WITNESS: Yeah, I didn't hear
23 you either, Ragan, sorry.

24 MR. NARESH: I'm objecting to the
25 form.

1 BY MR. TILLERY:

2 Q. Go ahead and answer, sir.

3 A. Okay, thank you. Yeah. So, no,
4 I can't -- I don't know why that was appearing
5 here.

6 Q. Do you understand that Syngenta
7 still claims on its website that:

8 "Paraquat, even at the maximum
9 tolerated dose, does not cause dopaminergic
10 neuronal cell loss in the area of the brain
11 associated with Parkinson's disease"?

12 Were you aware of that?

13 A. So to clarify, that is what we're
14 saying today?

15 Q. Yes.

16 A. Right. And that is, overall, still
17 our view because of the extensive work that
18 we have done in the animal model up to the
19 maximum tolerated dose, where we've been
20 unable to replicate the earlier findings that
21 we've been discussing extensively over the
22 last few days.

23 Q. In other words, the Marks findings,
24 right?

25 A. What I'm describing now are the --