IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

IN RE: PARAQUAT PRODUCTS LIABILITY LITIGATION ***APPLICABLE TO ALL CASES***	**May Term, 2022** **No. 559**

SYNGENTA CROP PROTECTION, LLC AND SYNGENTA AG'S AMENDED RESPONSES AND OBJECTIONS TO PLAINTIFFS' THIRD SET OF REQUESTS FOR ADMISSION

Defendants Syngenta Crop Protection, LLC and Syngenta AG ("Syngenta") provide the following Amended Responses and Objections to Plaintiffs' Third Set of Requests for Admission served on August 2, 2024 ("Responses"). Syngenta's investigations are ongoing, and Syngenta reserves the right to update these Responses should additional information become available. Syngenta designates these Responses Confidential pursuant to the August 19, 2022 Protective Order. Subject to its General Objections below, Syngenta responds as follows.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Syngenta has never submitted a request to the EPA to amend its product labeling to include a warning that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Syngenta objects to this Request as vague and ambiguous as to the undefined word "neurotoxic" and to the ambiguous phrase "submitted a request." Subject to and without waiving its objections, Syngenta admits that it has not provided information on its paraquat labels indicating that paraquat is neurotoxic, for the reasons outlined below.

Syngenta states that the contents of its product label and the label's communications to workers are and have always been focused on the safe use of paraquat products. That approach is consistent with EPA guidance, and Syngenta's product labels have been approved by the EPA.

The EPA's review of pesticide labeling is governed by EPA's Title 40 CFR Part 156 of the Code of Federal Regulations ("CFR"), "Labeling Requirements for Pesticides and Devices," and the EPA's regulations govern what is included on each product label. Syngenta further states that the EPA requires that hazard information on labels be supported by scientific data, and the scientific data, including the EPA's own findings, do not support inclusion of such a warning on the label for any of Syngenta's paraquat-containing products.

REQUEST FOR ADMISSION NO. 2:

Admit that Syngenta has never submitted a request to the EPA to amend its product labeling to include information regarding the association between Paraquat exposure and Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Syngenta objects to this Request as vague and ambiguous as to the undefined word "association" and to the ambiguous phrase "submitted a request." Subject to and without waiving its objections, Syngenta admits that it has not provided information on its paraquat labels indicating that paraquat is associated with an increased risk of Parkinson's disease, for the reasons outlined below.

Syngenta states that the contents of its product label and the label's communications to workers are and have always been focused on the safe use of paraquat products. That approach is consistent with EPA guidance, and Syngenta's product labels have been approved by the EPA.

The EPA's review of pesticide labeling is governed by EPA's Title 40 CFR Part 156 of the Code of Federal Regulations ("CFR"), "Labeling Requirements for Pesticides and Devices," and

the EPA's regulations govern what is included on each product label. Syngenta further states that the EPA requires that hazard information on labels be supported by scientific data, and the scientific data, including the EPA's own findings, do not support inclusion of such a warning on the label for any of Syngenta's paraquat-containing products.

REQUEST FOR ADMISSION NO. 3:

Admit that Syngenta has never submitted a request to the EPA to amend its product labeling to include a warning that exposure to Paraquat may cause or contribute to Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Syngenta objects to this Request as vague and ambiguous as to the phrase "cause or contribute to" and to the ambiguous phrase "submitted a request." Subject to and without waiving its objections, Syngenta admits that it has not provided information on its paraquat labels indicating that paraquat may cause or contribute to Parkinson's disease for the reasons outlined below.

Syngenta states that the contents of its product label and the label's communications to workers are and have always been focused on the safe use of paraquat products. That approach is consistent with EPA guidance, and Syngenta's product labels have been approved by the EPA.

The EPA's review of pesticide labeling is governed by EPA's Title 40 CFR Part 156 of the Code of Federal Regulations ("CFR"), "Labeling Requirements for Pesticides and Devices," and the EPA's regulations govern what is included on each product label. Syngenta further states that the EPA requires that hazard information on labels be supported by scientific data, and the scientific data, including the EPA's own findings, do not support inclusion of such a warning on the label for any of Syngenta's paraquat-containing products.

REQUEST FOR ADMISSION NO. 4:

Admit that Syngenta has never warned consumers in the United States that Paraquat can cause Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 4:

Syngenta objects to this Request as vague and ambiguous as to the undefined word "warned" and the ambiguous phrase "can cause." Subject to and without waiving its objections, Syngenta states that it does not agree with the premise of the Request, i.e. that paraquat can cause Parkinson's disease, given that the scientific findings reached by independent, peer-reviewed research do not conclude that paraquat causes Parkinson's disease. Syngenta further states that the scientific data, including the EPA's own findings, do not support the statement that paraquat can cause Parkinson's disease. Moreover, "[a] consensus exists in the scientific community that the available evidence does not warrant a claim that paraquat causes Parkinson's disease." Douglas L. Weed, *Does paraquat cause Parkinson's disease? A review of reviews*, Neurotoxicology Vol. 86 (Sept. 2021).

Syngenta admits that it has never warned consumers in the United States that Paraquat can cause Parkinson's disease because such a conclusion is not supported by the scientific evidence. But Syngenta denies that it has never informed consumers about the alleged link between Paraquat and Parkinson's disease through various mediums, including a section on its website that has discussed an alleged link between Paraquat and Parkinson's disease, which currently includes a section titled "Does paraquat cause Parkinson's disease?" *See* Syngenta, *Paraquat*, https://www.syngenta.com/en/paraquat-in-the-media#parkinsons-disease (last accessed Oct. 29, 2024). Syngenta has included information about these allegations on its website for years and, whenever there are updates, has included information regarding the state of the science for consumers to review. To the extent this Request suggests that paraquat causes Parkinson's disease, Syngenta denies.

REQUEST FOR ADMISSION NO. 5:

Admit that Syngenta has never warned consumers in the United States that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 5:

Syngenta objects to this Request as vague and ambiguous as to the undefined word "warned" and the vague and ambiguous phrase "may be associated." Subject to and without waiving its objections, Syngenta denies this Request. Despite the fact that "[a] consensus exists in the scientific community that the available evidence does not warrant a claim that paraquat causes Parkinson's disease," Douglas L. Weed, *Does paraquat cause Parkinson's disease? A review of reviews*, Neurotoxicology Vol. 86 (Sept. 2021), Syngenta has included information about the alleged association between paraquat and Parkinson's Disease on its website for years and, whenever there are updates, has included information regarding the state of the science for consumers to review. *See* Syngenta, *Paraquat*, https://www.syngenta.com/en/paraquat-in-the-media#parkinsons-disease (last accessed Oct. 29, 2024). . To the extent this Request suggests that paraquat causes Parkinson's Disease, Syngenta denies.

REQUEST FOR ADMISSION NO. 6:

Admit that Syngenta has never warned consumers in the United States that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 6:

Syngenta objects to this Request as vague and ambiguous as to the undefined words "warned" and "neurotoxic." Subject to and without waiving its objections, Syngenta states that it does not agree with the premise of the Request, which seems to suggest that Paraquat is neurotoxic in all circumstances, regardless of dose, method of use, and other related variables. Syngenta denies that Paraquat is neurotoxic to humans using Paraquat consistent with label instructions.

Syngenta further incorporates its Response to Request for Admission No. 1. Syngenta denies that it has never informed consumers about the alleged link between paraquat and Parkinson's disease, and Paraquat's toxicity profile more generally. For example, Syngenta has included a section on its website that has discussed an alleged link between paraquat and Parkinson's disease, which currently includes a section titled "Does paraquat cause Parkinson's disease?" *See* Syngenta, *Paraquat*, https://www.syngenta.com/en/paraquat-in-the-media#parkinsons-disease (last accessed Oct. 29, 2024). Syngenta has also included information about Paraquat's toxicity profile on its website. *See e.g.*, https://web.archive.org/web/20170617102740/http://paraquat.com/safety/safety-to-humans (noting that "Paraquat is not a neurotoxicity hazard" while noting that Paraquat "is toxic by the oral route," among others). Syngenta has included human health and safety information about Paraquat on its website for years and, whenever there are updates, has included information regarding the state of the science for consumers to review.

REQUEST FOR ADMISSION NO. 7:

Admit that Syngenta never warned Plaintiff Douglas Nemeth that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 7:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 8:

Admit that Syngenta never warned Plaintiff Douglas Nemeth that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 8:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 9:

Admit that Syngenta never warned Plaintiff Keith Lutz that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 9:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 10:

Admit that Syngenta never warned Plaintiff Keith Lutz that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 10:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 11:

Admit that Syngenta never warned Plaintiff Donald Mabs that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 11:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 12:

Admit that Syngenta never warned Plaintiff Donald Mabs that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 12:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 13:

Admit that Syngenta never warned Plaintiff David Steele that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 13:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 14:

Admit that Syngenta never warned Plaintiff David Steele that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 14:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 15:

Admit that Syngenta never warned Plaintiff Wesley Lewis that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 15:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 16:

Admit that Syngenta never warned Plaintiff Wesley Lewis that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 16:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 17:

Admit that Syngenta never warned Plaintiff Stacey McGrath that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 17:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff McGrath.

REQUEST FOR ADMISSION NO. 18:

Admit that Syngenta never warned Plaintiff Stacey McGrath that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 18:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff McGrath.

REQUEST FOR ADMISSION NO. 19:

Admit that Syngenta never warned Plaintiff Phyllis Welsh that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 19:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Welsh.

REQUEST FOR ADMISSION NO. 20:

Admit that Syngenta never warned Plaintiff Phyllis Welsh that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Welsh.

REQUEST FOR ADMISSION NO. 21:

Admit that Syngenta never warned Larry Bowen that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Bowen.

REQUEST FOR ADMISSION NO. 22:

Admit that Syngenta never warned Plaintiff Larry Bowen that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Bowen.

REQUEST FOR ADMISSION NO. 23:

Admit that Syngenta never warned Plaintiff Stephen Skelton that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 23:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat is neurotoxic for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 24:

Admit that Syngenta never warned Plaintiff Stephen Skelton that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 24:

Syngenta objects to this Request as duplicative of Plaintiffs' Third Requests for Admission Nos. 1-6. Subject to and without waiving its objections, Syngenta admits that it never included a warning on its product labels that Paraquat may be associated with Parkinson's disease for the reasons explained in its Responses to Request for Admission Nos. 1-6.

REQUEST FOR ADMISSION NO. 25:

Admit that Syngenta never warned Plaintiff Randy Parsley that Paraquat is neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 25:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Parsley.

REQUEST FOR ADMISSION NO. 26:

Admit that Syngenta never warned Plaintiff Randy Parsley that Paraquat exposure may be associated with Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 26:

Syngenta objects to this Request because Plaintiffs have voluntarily discontinued their case against Defendants with respect to Plaintiff Parsley.

REQUEST FOR ADMISSION NO. 27:

Admit that Syngenta has never conducted any chronic animal toxicity studies on Paraquat formulations containing surfactants.

RESPONSE TO REQUEST FOR ADMISSION NO. 27:

Syngenta objects to this Request as vague and ambiguous with respect to the undefined phrase "chronic animal toxicity studies." Syngenta further states that it complies with the testing requirements for formulated products established by regulatory agencies, including short-term studies on the products and also by conducting numerous chronic-exposure animal studies on non-formulated paraquat. Scientifically, these chronic toxicity experiments are designed to study exposure to paraquat that is several orders of magnitude higher than any method of occupational exposure. The high doses of the active ingredient used in these studies not only assess the toxicity of paraquat itself but also any toxic effects which may be increased by the presence of other substances found in the formulations, such as surfactants, which could increase the absorption of

paraquat. Syngenta further states that it has also conducted studies specifically to investigate the presence surfactants on dermal absorption. *See* Ward, R.J., *Paraquat: In Vitro Absorption From a 200k 1-1 SL Formulation Through Human Epidermis* (2004); Clowes, *Paraquat: 200 g/l SL Formulation:* In Vitro *Absorption of Paraquat Through Human Epidermis* (2000). Those studies concluded that the addition of a non-ionic surfactant to the paraquat formulation does not meaningfully increase dermal absorption of paraquat. *See id.* These findings are consistent with biomonitoring studies, which also demonstrate that applicators who use surfactants per the label do not exhibit meaningfully different exposures. *See* Meier, *Paraquat: Worker Exposure During Mixing, Loading and Application of Gramoxone Extra to Pecans Using Vehicle Mounted, Ground Boom Equipment* (1995). Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not identified chronic-exposure animal studies that it conducted using paraquat formulations containing surfactants.

REQUEST FOR ADMISSION NO. 28:

Admit that Syngenta has never conducted any neurotoxicity studies on Paraquat formulations containing surfactants.

RESPONSE TO REQUEST FOR ADMISSION NO. 28:

Syngenta objects to this Request as vague and ambiguous with respect to the undefined phrase "neurotoxicity studies." Subject to and without waiving its objections, denied.

REQUEST FOR ADMISSION NO. 29:

Admit that Syngenta is not precluded by any applicable law, regulation, or ordinance from conducting an animal study on paraquat formulations containing surfactants.

RESPONSE TO REQUEST FOR ADMISSION NO. 29:

Syngenta objects to this Request to the extent that it calls for a legal conclusion regarding applicable laws and regulations of testing of paraquat products that are not the subject of this

lawsuit. Syngenta further states that it conducts toxicity tests in accordance with applicable laws, including tests on formulated products. Syngenta further objects to this Request to the extent that it is intended to imply that Syngenta has not conducted animal studies on paraquat formulations containing surfactants, because it has done so as evidenced by in its Response to Request for Admission No. 27. Subject to and without waiving its objections, Syngenta admits that it is not aware of a law, regulation, or ordinance that would preclude it from conducting an animal study with paraquat formulations containing surfactant.

REQUEST FOR ADMISSION NO. 30:

Admit that Syngenta has never conducted any chronic animal toxicity studies assessing the effect of Paraquat on dopaminergic neurons in the brain.

RESPONSE TO REQUEST FOR ADMISSION NO. 30:

Syngenta objects to the undefined phrase "chronic animal toxicity studies" as vague and ambiguous. Syngenta further objects to this Request to the extent that it seeks information that is the subject of expert testimony. Subject to and without waiving its objections, Syngenta admits that it has tested dopaminergic neurons in the brains of animals under various conditions and dosing regimens, including in the brains of C57BL mice.

REQUEST FOR ADMISSION NO. 31:

Admit that cyanide is routinely detected in Paraquat technical.

RESPONSE TO REQUEST FOR ADMISSION NO. 31:

Syngenta objects to this Request as vague and ambiguous as to the undefined term "routinely." Subject to and without waiving its objections, Syngenta admits that there can be residual cyanide in the technical grades of paraquat produced via the ammonia cyanide process. Syngenta tests for this in the final product storages, wherein the upper acceptable limit for free

cyanide is 0.2g/kg (i.e., 200 parts per million). Syngenta typically detects amounts half of this value. Syngenta states that the cyanide content would be further diluted to some degree, depending on the exact formulation process and recipe.

REQUEST FOR ADMISSION NO. 32:

Admit that EPA employee Thurston Morton attended the University of Rhode Island with Syngenta's Head of Regulatory for North America, John Abbott.

RESPONSE TO REQUEST FOR ADMISSION NO. 32:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who "attended the University of Rhode Island" without providing additional identifying information. Subject to and without waiving its objections, Syngenta admits that John Abbott testified that a Thurston Morton attended a program at the University of Rhode Island for some indeterminate amount of time while Mr. Abbott was receiving his Ph.D. from the University of Rhode Island. Abbott Dep. Tr. 125:21-126:23. Syngenta further states that Mr. Abbott testified that he had "very limited interactions with" this Thurston Morton and that he did not "stay in touch" with Mr. Morton after their "limited interactions" at the University of Rhode Island. *Id.*

REQUEST FOR ADMISSION NO. 33:

Admit that EPA employee Thurston Morton was one of the authors of the Paraquat Human Health Risk Assessment dated June 26, 2019.

RESPONSE TO REQUEST FOR ADMISSION NO. 33:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who is an "EPA employee" without providing additional identifying information. Syngenta further objects to "the Paraquat Human Health Risk Assessment" as vague and ambiguous. Syngenta also objects to this Request to the

extent that this information is equally available to Plaintiffs. Subject to and without waiving its objections, Syngenta admits that a Thurston Morton is listed as one of persons that sent a memorandum titled "Paraquat Dichloride: Draft Human Health Risk Assessment in Support of Registration Review," found at https://bit.ly/3AjVPKz, to the Office of Pesticide Programs at the EPA.

REQUEST FOR ADMISSION NO. 34:

Admit that EPA employee Thurston Morton was one of the authors of the HED Response to Comments on the Paraquat: Response to Comments on the Draft Human Health Risk Assessment dated September 4, 2020.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who is an "EPA employee" without providing additional identifying information. Syngenta further objects to "HED Response to Comments on the Paraquat: Response to Comments on the Draft Human Health Risk Assessment dated September 4, 2020" as vague and ambiguous. Syngenta also objects to this Request to the extent that this information is equally available to Plaintiffs. Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not identified such a response dated September 4, 2020, but it has identified such a publication dated September 24, 2020. *See* SYNG-PQ-PA-00017310. Syngenta thus denies the Request as written.

REQUEST FOR ADMISSION NO. 35:

Admit that EPA employee Thurston Morton was one of the authors of the HED Response to Comments on the Proposed Interim Decision for Registration Review and updated Occupational Handler Exposure and Risk Estimates for Paraquat dated June 22, 2021.

RESPONSE TO REQUEST FOR ADMISSION NO. 35:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who is an "EPA employee" without providing additional identifying information. Syngenta further objects to "HED Response to Comments on the Proposed Interim Decision for Registration Review and updated Occupational Handler Exposure and Risk Estimates for Paraquat dated June 22, 2021" as vague and ambiguous. Syngenta also objects to this Request to the extent that this information is equally available to Plaintiffs. Subject to and without waiving its objections, Syngenta admits that an individual named Thurston Morton is listed as one of the persons that sent a memorandum titled "**Paraquat:** HED Response to Comments on the Proposed Interim Decision for Registration Review and updated Occupational Handler Exposure and Risk Estimates," dated June 22, 2021.

REQUEST FOR ADMISSION NO. 36:

Admit that EPA employee Thurston Morton applied for a job at Syngenta while he was an employee with the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 36:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who is an "EPA employee" without providing additional identifying information. Subject to and without waiving its objections, Syngenta admits that an individual named Thurston Morton applied for a role at Syngenta in February 2023 and a different role in June 2023. Syngenta further states that, based on a reasonable investigation, Mr. Morton was not ultimately hired by Syngenta.

REQUEST FOR ADMISSION NO. 37:

Admit that EPA employee Thurston Morton spoke to Syngenta's Head of Regulatory for North America, John Abbott, about working at Syngenta while Thurston Morton was an employee with the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 37:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Thurston Morton" who is an "EPA employee" without providing additional identifying information. Syngenta further objects to this Request to the extent that it asks for information outside of Syngenta's possession, custody, and control. Subject to and without waiving its objections, Syngenta admits that John Abbott testified that an individual named Thurston Morton "expressed an interest" in working at Syngenta while Mr. Morton was an employee of the EPA. Abbott Dep. Tr. 124:4-125:20. Based on a reasonable investigation, Syngenta states that Mr. Morton was never hired by Syngenta.

REQUEST FOR ADMISSION NO. 38:

Admit that Carolina Vaccari is the lead author of the published study: Paraquat and Parkinson's disease: a systematic review and meta-analysis of observational studies J Toxicol Environ Health B Crit Rev 2019;22(5-6):172-202.

RESPONSE TO REQUEST FOR ADMISSION NO. 38:

Syngenta admits that Carolina Vaccari is the first author listed in the cited study.

REQUEST FOR ADMISSION NO. 39:

Admit that Carolina Vaccari communicated with Syngenta employees about working at Syngenta prior to the publication of Paraquat and Parkinson's disease: a systematic review and meta-analysis of observational studies J Toxicol Environ Health B Crit Rev 2019;22(5-6):172202.

RESPONSE TO REQUEST FOR ADMISSION NO. 39:

Syngenta admits that Carolina Vaccari communicated with Syngenta employees about the possibility of working at Syngenta at least as early as 2017, when she was considered for a role as a product safety analyst. *See, e.g.*, SYNG-PQ-19352267.

REQUEST FOR ADMISSION NO. 40:

Admit that Carolina Vaccari was hired by Syngenta after the publication of Paraquat and Parkinson's disease: a systematic review and meta-analysis of observational studies J Toxicol Environ Health B Crit Rev 2019;22(5-6):172-202.

RESPONSE TO REQUEST FOR ADMISSION NO. 40:

Syngenta admits that Carolina Vaccari started working for Syngenta after the publication of the article referenced in Request No. 40. Syngenta admits that it hired Carolina Vaccari for a role in Syngenta's product-safety group in Brazil; she started in that role in December 2019. Syngenta states that it appears that "Paraquat and Parkinson's disease: a systematic review and meta-analysis of observational studies J Toxicol Environ Health B Crit Rev 2019;22(5-6):172-202" was published in September 2019.**REQUEST FOR ADMISSION NO. 41:**

Admit that EPA staff toxicologist Jennifer Ryman-Rasmussen attended a meeting between Syngenta and the EPA in March 2010 where Syngenta presented information and data relating to Paraquat and Parkinson's Disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 41:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Jennifer Ryman-Rasmussen" who is an "EPA staff toxicologist" without providing additional identifying information. Syngenta further objects to this Request as vague and ambiguous as it asks about meeting attendees at a "March 2010" meeting "between Syngenta and the EPA" where "Syngenta presented information and data relating to Paraquat and Parkinson's Disease." Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not identified evidence of a Ms. Ryman-Rasmussen attending such a meeting in March 2010, but admits that a Ms. Ryman-Rasmussen

attended a May 2010 meeting that meets the description contained in the Request. *See* SYNG-PQ_06518293. Syngenta thus denies the Request as written.

REQUEST FOR ADMISSION NO. 42:

Admit that Jennifer Ryman-Rasmussen applied for a job at Syngenta in 2011.

RESPONSE TO REQUEST FOR ADMISSION NO. 42:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Jennifer Ryman-Rasmussen" without providing additional identifying information. Subject to and without waiving its objections, Syngenta admits that it appears from SYNG-PQ-ATR-04534099 and SNYG-PQ-ATR-07876571 that Ms. Ryman-Rasmussen applied for a job at Syngenta in 2011, though it has not been able to find information in its HR system verifying that to be true. Syngenta further notes that, in the potential job application it identified, Ms. Ryman-Rasmussen states: "I am applying to Syngenta because of Syngenta's reputation for good science and quality work[.]" SYNG-PQ-ATR-04534099. Syngenta further states that Ms. Rasmussen was never hired.

REQUEST FOR ADMISSION NO. 43:

Admit that Alberto Grimaldo Orozco was a former employee of Syngenta.

RESPONSE TO REQUEST FOR ADMISSION NO. 43:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta further objects to this Request as irrelevant. Subject to and without waiving its objections, Syngenta admits that an Alberto Grimaldo Orozco, D.O.B. 09/17/1965, was a former employee of Syngenta and Zeneca Mexicana.

REQUEST FOR ADMISSION NO. 44:

Admit that Alberto Grimaldo Orozco worked at Syngenta or its predecessor companies between 1994 and 2009.

RESPONSE TO REQUEST FOR ADMISSION NO. 44:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta further objects to this Request as irrelevant. Subject to and without waiving its objections, Syngenta admits that an Alberto Grimaldo Orozco, D.O.B. 09/17/1965, worked at Zeneca Mexicana beginning around 1994 or 1995, and at Syngenta from 2000 to 2009.

REQUEST FOR ADMISSION NO. 45:

Admit that Alberto Grimaldo Orozco was Head of Quality Control at Syngenta's San Luis Potosi formulation plant in Mexico.

RESPONSE TO REQUEST FOR ADMISSION NO. 45:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta further objects to this Request as irrelevant. Subject to and without waiving its objections, Syngenta admits that Alberto Grimaldo Orozco, D.O.B. 09/17/1965, was Chief of Quality Control at a Syngenta San Luis Potosi plant in Mexico for some amount of time.

REQUEST FOR ADMISSION NO. 46:

Admit that Alberto Grimaldo Orozco, a former employee of Syngenta was diagnosed with Parkinson's Disease in 2008.

RESPONSE TO REQUEST FOR ADMISSION NO. 46:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta further objects to this Request as irrelevant. Syngenta further objects to this Request to the extent that it requests information that is outside Syngenta's possession, custody, or control. Subject to and without waiving its objections, Syngenta admits that in 2009 it received an initial medical diagnostic from the Mexican Social Security Institute (IMSS), which stated that Alberto Grimaldo Orozco, D.O.B. 09/17/1965, had been diagnosed with Parkinson's disease.

REQUEST FOR ADMISSION NO. 47:

Admit that physicians with the Mexican Social Security Institute (IMSS) concluded that Alberto Grimaldo Orozco's occupational exposure to Paraquat contributed to his development of Parkinson Disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 47:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta also objects to the phrase "contributed to his development" as vague and ambiguous. Syngenta further objects to this Request to the extent that it requests information that is outside Syngenta's possession, custody, or control. Syngenta further objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that in 2009 it received an initial medical diagnostic from the Mexican Social Security Institute (IMSS), which stated that Alberto Grimaldo Orozco, D.O.B. 09/17/1965, had been diagnosed with Parkinson's disease. Syngenta admits that the medical resolution mentioned exposure to pesticides generally. Syngenta

further explains that the diagnostic did not include any scientific support for the theory that pesticides contribute to the development of Parkinson's disease. Syngenta also admits that the Institute Mexicano del Seguro Social San Luis Potosi drafted a report that after reviewing a body of contemporaneous literature, concluded that "there was a broad association in the worker between inhaled dermal exposure of paraquat in work activities and Parkinson's disease, for it is determined it is a working disease." SYNG-PQ-MDL-000423618, at -20. Syngenta further explains that the report does not specify which worker it is referring to. Syngenta further states that the report noted this worker's exposure to diquat and pyrethroid insecticides. *See id.* Unless specifically admitted herein, denied.

REQUEST FOR ADMISSION NO. 48:

Admit that Syngenta never informed the EPA of the finding of the Mexican Social Security Institute (IMSS) that Alberto Grimaldo Orozco's occupational exposure to Paraquat contributed to his development of Parkinson Disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 48:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta also objects to the phrases "informed the EPA" and "contributed to his development" as vague and ambiguous. Syngenta also objects to this Request to the extent that it suggests that Syngenta was under a legal obligation to "inform[ ] the EPA" of a particular finding. Syngenta further objects to this Request as misleading because it suggests the Mexican Social Security Institute ("IMSS") found that paraquat specifically contributed to his development of Parkinson's disease.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation, it has not found evidence of submitting an IMSS finding about Mr. Orozco to the

EPA. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 49:

Admit that Syngenta never reported Alberto Grimaldo Orozco's diagnosis of Parkinson's Disease to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 49:

Syngenta objects to this Request as vague and ambiguous to the extent that it asks for information about an individual named "Alberto Grimaldo Orozco" without providing additional identifying information. Syngenta also objects to the phrase "reported . . . to the EPA" as vague and ambiguous. Syngenta further objects to this Request to the extent that it suggests that Syngenta had a duty to report a particular finding to the EPA. Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence of submitting an IMSS finding about Mr. Orozco to the EPA. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never

cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 50:

Admit that Dr. Ted Lock is a qualified expert on the transport of chemicals through the blood-brain barrier.

RESPONSE TO REQUEST FOR ADMISSION NO. 50:

Syngenta objects to this Request as vague and ambiguous as to the phrases "qualified expert" and "transport of chemicals through the blood-brain barrier." Syngenta also objects to this Request as a it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion. Subject to those objections, Syngenta admits that Dr. Ted Lock has the expertise to analyze studies on the transport of chemicals through the blood-brain barrier.

REQUEST FOR ADMISSION NO. 51:

Admit that Syngenta invited Dr. Ted Lock to provide his opinions on the ability of Paraquat to pass through the blood-brain barrier.

RESPONSE TO REQUEST FOR ADMISSION NO. 51:

Syngenta objects to this Request as vague and ambiguous as the Request does not specify a time period. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion. Subject to and without waiving its objections, Syngenta admits that Dr. Ted Lock was asked by Syngenta to conduct an analysis on scientific literature as it relates to paraquat transporters in 2007.

REQUEST FOR ADMISSION NO. 52:

Admit that Dr. Ted Lock provided a memorandum to Syngenta on December 21, 2007 titled "How does the herbicide paraquat enter the brain?" containing his opinion that "What is now beyond doubt is that paraquat can enter dopaminergic neurons in the substantia nigra of C57B16 mice in sufficient concentration to cause cell death."

RESPONSE TO REQUEST FOR ADMISSION NO. 52:

Syngenta objects to this Request to the extent that it mischaracterizes a document by selectively quoting, omitting, or emphasizing certain language or by drawing related inferences or by stating related opinions. Syngenta also objects to this Request as improper and misleading because it omits testimonial evidence from Dr. Ted Lock's deposition that provides additional context for the statement. Subject to and without waiving its objections, Syngenta admits that Dr. Lock provided the memorandum referenced in the Request and that it contains the quoted statement. Syngenta further states that Dr. Lock also testified during his deposition that the statement was made based on his review of the literature, and that "[a]t that time we had really serious questions around whether that was real. And I – I think – my view on it now is I'm not sure that it's real, that I think it was an artifact of the experimental work." E. Lock Dep. Tr. at 40:7-20. Dr. Lock continued: "there are a number of studies that have been done where paraquat has been administered to very young animals where the blood brain barrier is not intact so that more paraquat can enter the brain and potentially produce effects. But when the blood brain barrier is intact I believe, from the work we've done, that very little of the paraquat enters." *Id.* at 41:22-42:5.

REQUEST FOR ADMISSION NO. 53:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether Dr. Ted Lock's December 21, 2007 memo titled "How does the herbicide paraquat enter the brain? should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 53:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing

statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this memorandum to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 54:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether Dr. Ted Lock's December 21, 2007 memo titled "How does the herbicide paraquat enter the brain?" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 54:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this memorandum to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 55:

Admit that Syngenta never submitted Dr. Ted Lock's December 21, 2007 memo titled "How does the herbicide paraquat enter the brain?" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 55:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the memorandum located at SYNG-PQ-20758517 as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 56:

Admit that Dr. Joan Abbot is a qualified expert on the transport of chemicals through the blood-brain barrier.

RESPONSE TO REQUEST FOR ADMISSION NO. 56:

Syngenta objects to this Request as vague and ambiguous as to the phrases "qualified expert" and "transport of chemicals through the blood-brain barrier." Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a

legal conclusion. Subject to and without waiving its objections, Syngenta admits that Dr. Joan Abbot has the expertise to analyze studies on the transport of chemicals through the blood-brain barrier.

REQUEST FOR ADMISSION NO. 57:

Admit that Syngenta invited Dr. Joan Abbot to provide her opinions on the ability of Paraquat to pass through the blood-brain barrier.

RESPONSE TO REQUEST FOR ADMISSION NO. 57:

Syngenta objects to this Request as vague and ambiguous as the Request does not specify a time period. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion. Subject to and without waiving its objections, Syngenta admits that Dr. Joan Abbott was asked to present on information regarding certain chemicals and the blood-brain barrier in 2009.

REQUEST FOR ADMISSION NO. 58:

Admit that Dr. Joan Abbott provided a powerpoint to Syngenta dated April 20, 2009 (SYNG-PQ-00471694) containing her opinion that Non-ionic detergents increase the permeability of the blood-brain barrier.

RESPONSE TO REQUEST FOR ADMISSION NO. 58:

Syngenta objects to this Request to the extent that it mischaracterizes a document by selectively quoting, omitting, or emphasizing certain language or by drawing related inferences or stating related opinions. Syngenta also objects to the phrase "Non-ionic detergents" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that Dr. Joan Abbott provided a 143-slide PowerPoint presentation to Syngenta dated April 20, 2009 regarding a number of topics, including central nervous system barriers, blood-brain barriers, neurovascular units, regional and species differences, and future perspectives. Syngenta also admits that on one

particular slide of her presentation, Dr. Abbott appears to have presented information on certain agents that may increase permeability. Syngenta denies that it was Dr. Abbott's opinion that "Non-ionic detergents increase the permeability of the blood-brain barrier" because it is unclear whether she was referring to the increase in permeability of the blood-brain barrier or the perineurium. The document speaks for itself.

REQUEST FOR ADMISSION NO. 59:

Admit that non-ionic surfactants are non-ionic detergents.

RESPONSE TO REQUEST FOR ADMISSION NO. 59:

Syngenta objects to the phrases "non-ionic surfactants" and "non-ionic detergents" as vague and ambiguous. Subject to and without waiving its objections, Syngenta denies that all non-ionic surfactants are non-ionic detergents.

REQUEST FOR ADMISSION NO. 60:

Admit that Dr. Joan Abbott provided a powerpoint to Syngenta dated April 20, 2009 (SYNG-PQ-00471694) containing the opinion that the slow clearance of Paraquat from the brain suggests intracellular sequestering in the central nervous system and the potential for long term toxicity.

RESPONSE TO REQUEST FOR ADMISSION NO. 60:

Syngenta objects to this Request to the extent that it mischaracterizes a document by selectively quoting, omitting, or emphasizing certain language or by drawing related inferences or stating related opinions. Syngenta also objects to the phrases "slow clearance of Paraquat," "intracellular sequestering," and "the potential for long term toxicity as undefined, vague, and ambiguous. Subject to and without waiving its objections, Syngenta admits that Dr. Joan Abbott provided a 143-slide PowerPoint presentation to Syngenta dated April 20, 2009 regarding a number of topics, including central nervous system barriers, blood-brain barriers, neurovascular

units, regional and species differences, and future perspectives. As part of her presentation, Dr. Abbott referenced a number of studies that were already in the public literature at the time that appear to have suggested that paraquat clears slowly from the rodent brain. Based on Dr. Abbott's review of the contemporaneous literature, she concluded that the "[v]ery slow clearance suggests intracellular sequestering in CNS – potential for long-term toxicity," . SYNG-PQ-00471764. To be clear, Syngenta denies that Dr. Abbott formed an independent basis to conclude that the slow clearance of paraquat from the brain suggests intracellular sequestering in the central nervous system and the potential for long term toxicity. Notably, Dr. Abbott also concludes on the same slide that there is a "[n]eed [for] more studies of mechanisms for CNS uptake (BBB, CP) and efflux/clearance of PQ, in combination with other potential compounding factors; PBPK." *Id.* Following Dr. Abbott's presentation, Syngenta continued to conduct mouse injection studies to better assess the pharmacokinetics and neurotoxicity of paraquat. For example, in 2013, Dr. Charles Breckenridge published a peer-reviewed study that found the injection of "near-lethal doses of PQ" failed to show the "constellation of effects" that would suggest neuron death in the relevant part of the brain. *See* Charles Breckenridge, et al., *Pharmacokinetic, neurochemical, stereological and neuropathological studies on the potential effects of paraquat in the substantia nigra pars compacta and striatum of male C57BL/6J mice* (2013) ("Breckenridge 2013"). While Dr. Breckenridge found that paraquat administered by intraperitoneal ("i.p.") injection to the C57BL/6J mice entered the brain and it was then slowly eliminated, Dr. Breckenridge concluded that "the totality of the evidence from this research program indicates there was no consistent stereological evidence of a loss of TH+ staining in the SNpc of male C57BL/6J mice administered PQ at near-lethal doses. Neurochemical changes were always observed following MPTP treatment, but there were never any changes in DA levels or DA turnover in the striatum after PQ treatment.

There was clear evidence of neuropathological changes in the SNpc and the striatum after MPTP treatment in three separate studies, but there was no evidence that PQ had any effect on a broad range of indicators of cell death, in both the SNpc and the striatum." Id.

REQUEST FOR ADMISSION NO. 61:

Admit that Dr. Joan Abbott provided a powerpoint to Syngenta dated April 20, 2009 (SYNG-PQ-00471694) containing the opinion that the combination of carrier-mediated uptake of Paraquat into the brain with very low clearance and known toxicity created a problematic profile.

RESPONSE TO REQUEST FOR ADMISSION NO. 61:

Syngenta objects to this Request to the extent that it mischaracterizes a document by selectively quoting, omitting, or emphasizing certain language or by drawing related inferences or stating related opinions. Syngenta also objects to the phrases "carrier-mediated uptake," "very low clearance," "known toxicity," and "problematic profile" as undefined, vague, and ambiguous. Subject to and without waiving its objections, Syngenta admits that Dr. Joan Abbott provided a 143-slide PowerPoint presentation to Syngenta dated April 20, 2009 regarding a number of topics, including central nervous system barriers, blood-brain barriers, neurovascular units, regional and species differences, and future perspectives. As part of her presentation, Dr. Abbott references a number of studies that were already in the public literature at the time that appear to have suggested that a combination of carrier-mediated uptake and slow clearance would create a "problematic profile." SYNG-PQ-00471764. To be clear, Syngenta denies that Dr. Abbott formed an independent basis to conclude that a combination of carrier-mediated uptake and slow clearance would create a "problematic profile." Notably, Dr. Abbott also concludes on the same slide that there is a "[n]eed [for] more studies of mechanisms for CNS uptake (BBB, CP) and efflux/clearance of PQ, in combination with other potential compounding factors; PBPK." *Id.* Following Dr. Abbott's presentation, Syngenta continued to conduct mouse-injection studies to

better assess the pharmacokinetics and neurotoxicity of paraquat. For example, in 2013, Dr. Breckenridge published a peer-reviewed study that found the injection of "near-lethal doses of PQ" failed to show the "constellation of effects" that would suggest neuron death in the relevant part of the brain. *See* Breckenridge 2013. While Dr. Breckenridge found that paraquat administered by i.p. injection to the C57BL/6J mice entered the brain and it was then slowly eliminated, Dr. Breckenridge concluded that "the totality of the evidence from this research program indicates there was no consistent stereological evidence of a loss of TH+ staining in the SNpc of male C57BL/6J mice administered PQ at near-lethal doses. Neurochemical changes were always observed following MPTP treatment, but there were never any changes in DA levels or DA turnover in the striatum after PQ treatment. There was clear evidence of neuropathological changes in the SNpc and the striatum after MPTP treatment in three separate studies, but there was no evidence that PQ had any effect on a broad range of indicators of cell death, in both the SNpc and the striatum." *Id*.

REQUEST FOR ADMISSION NO. 62:

Admit that Syngenta never submitted Dr. Joan Abbott's April 20, 2009 powerpoint presentation (SYNG-PQ-00471694) to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 62:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that Dr. Abbott's 2009 PowerPoint presentation was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation, Syngenta admits that it does not have record of submitting the PowerPoint presentation located at SYNG-PQ-00471694 as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 63:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from Dr. Joan Abbott's April 20, 2009 (SYNG-PQ-00471694) powerpoint presentation should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 63:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as

it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this PowerPoint presentation to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 64:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the opinions from Dr. Joan Abbott's April 20, 2009 powerpoint presentation (SYNG-PQ-00471694) should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 64:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear

whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this PowerPoint presentation to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 65:

Admit that Syngenta never submitted the study report titled IHR 213 – TOXICITY TESTS ON GRAMOXONE FOR REGISTRATION IN THE U.S.S.R to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 65:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat. Syngenta further explains that the cited report was completed in 1967, and the EPA did not assume responsibility for regulating pesticides until 1970. Furthermore, FIFRA's Section 6(a)(2)—which defines and describes a registrants' reporting requirements—was not enacted until 1972.

REQUEST FOR ADMISSION NO. 66:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from IHR 213 - TOXICITY TESTS ON GRAMOXONE FOR REGISTRATION IN THE U.S.S.R should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 66:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal

Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat. Syngenta further explains that the cited report was completed in 1967, and the EPA did not assume responsibility for regulating pesticides until 1970. Furthermore, FIFRA's Section 6(a)(2)— which defines and describes a registrants' reporting requirements—was not enacted until 1972.

REQUEST FOR ADMISSION NO. 67:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from IHR 213 - TOXICITY TESTS ON GRAMOXONE FOR REGISTRATION IN THE U.S.S.R should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 67:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine

internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat. Syngenta further explains that the cited report was completed in 1967, and the EPA did not assume responsibility for regulating pesticides until 1970. Furthermore, FIFRA's Section 6(a)(2)—which defines and describes a registrants' reporting requirements—was not enacted until 1972.

REQUEST FOR ADMISSION NO. 68:

Admit that Syngenta never submitted the study report "CTL/R/373-The Effect Of Surfactants On The Toxicity And Intestinal Absorption Of – Paraquat" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 68:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 69:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/R/373-The Effect Of Surfactants On The Toxicity And Intestinal Absorption Of – Paraquat" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 69:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine

internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 70:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/R/373-The Effect Of Surfactants On The Toxicity And Intestinal Absorption Of – Paraquat" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 70:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 71:

Admit that Syngenta never submitted the study report "CTL/R/375: THE EFFECTS OF SURFACTANTS ON THE TOXICITY AND GASTROINTESTINAL ABSORPTION OF PARAQUAT" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 71:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 72:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/R/375: THE EFFECTS OF SURFACTANTS ON THE TOXICITY AND GASTROINTESTINAL ABSORPTION OF PARAQUAT" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 72:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 73:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/R/375: THE EFFECTS OF SURFACTANTS ON THE TOXICITY AND GASTROINTESTINAL ABSORPTION OF PARAQUAT" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 73:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1976. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with

its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 74:

Admit that Syngenta never submitted the study report "CTL/P/448: TOXICOLOGICAL COMPARISON OF NEW WETTER SYSTEMS FOR PARAQUAT FORMULATIONS" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 74:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1979. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 75:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/P/448: TOXICOLOGICAL COMPARISON OF NEW WETTER SYSTEMS FOR PARAQUAT FORMULATIONS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 75:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objections to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1979. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and

followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 76:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/P/448: TOXICOLOGICAL COMPARISON OF NEW WETTER SYSTEMS FOR PARAQUAT FORMULATIONS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 76:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1979.

Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 77:

Admit that Syngenta never submitted the study report "CTL/L/1428 PREEGLOX-L: PHARMACO-KINETIC STUDY IN THE RAT" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 77:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 78:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/L/1428 PREEGLOX-L: PHARMACO-KINETIC STUDY IN THE RAT" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 78:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the

EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 79:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/L/1428 PREEGLOX-L: PHARMACO-KINETIC STUDY IN THE RAT" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 79:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has

similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 80:

Admit that Syngenta never submitted the study report "CTL/P/4501 PARAQUAT: IN VITRO ABSORPTION FROM A 200g SL FORMULATION THROUGH HUMAN EPIDERMIS" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 80:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1994. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 81:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/P/4501 PARAQUAT: IN VITRO ABSORPTION FROM A 200g SL FORMULATION THROUGH HUMAN EPIDERMIS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 81:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objections to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1994. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and

followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 82:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/P/4501 PARAQUAT: IN VITRO ABSORPTION FROM A 200g SL FORMULATION THROUGH HUMAN EPIDERMIS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 82:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1994.

Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 83:

Admit that Syngenta never submitted the study report "CTL/JV/1599 RESEARCH/REPORT PARAQUAT: SKIN IRRITATION OF BIPYIRIDYL FORMULATIONS – IN VITRO ASSESSMENT USING RABBIT SKIN" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 83:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 84:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/JV/1599 RESEARCH/REPORT PARAQUAT: SKIN IRRITATION OF BIPYIRIDYL FORMULATIONS – IN VITRO ASSESSMENT USING RABBIT SKIN" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 84:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 85:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/JV/1599 RESEARCH/REPORT PARAQUAT: SKIN IRRITATION OF BIPYIRIDYL FORMULATIONS – IN VITRO ASSESSMENT USING RABBIT SKIN" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 85:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 86:

Admit that Syngenta never submitted the study report "CTL/JV1806/REPORT: PHASE SEPARATED GRAMOXONE (A14380A): PREDICTION OF ACUTE SKIN IRRITATION USING THE INTEGRITY FUNCTION TEST" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 86:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 87:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/JV1806/REPORT: PHASE SEPARATED GRAMOXONE (A14380A): PREDICTION OF ACUTE SKIN IRRITATION USING THE INTEGRITY FUNCTION TEST" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 87:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 88:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/JV1806/REPORT: PHASE SEPARATED GRAMOXONE (A14380A): PREDICTION OF ACUTE SKIN IRRITATION USING THE INTEGRITY FUNCTION TEST" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 88:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 89:

Admit that Syngenta never submitted the study report "CTL/R/1463 XENOBIOTICS LINKED TO PARKINSON'S DISEASE" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 89:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this study report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 90:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CTL/R/1463 XENOBIOTICS LINKED TO PARKINSON'S DISEASE" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 90:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 91:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CTL/R/1463 XENOBIOTICS LINKED TO PARKINSON'S DISEASE" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 91:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 92:

Admit that Syngenta never submitted the report "PRODUCT SAFETY TECHNICAL EVALUATION: Claimed links Between Exposure to Paraquat and Development of Parkinson's Disease – A Consideration of the Potential Implications for Reference Doses Draft: September 2009" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 92:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that the referenced report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 93:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "PRODUCT SAFETY TECHNICAL EVALUATION: Claimed links Between Exposure to Paraquat and Development of Parkinson's Disease – A Consideration of the Potential Implications for Reference Doses Draft: September 2009" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 93:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 94:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "PRODUCT SAFETY TECHNICAL EVALUATION: Claimed links Between Exposure to Paraquat and Development of Parkinson's Disease – A Consideration of the Potential Implications for Reference Doses Draft: September 2009" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 94:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA

under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 95:

Admit that Syngenta never submitted the Exponent study report "Dose-Response Analysis of the Paraquat and Maneb Model for Parkinson's Disease Using Human-Relevant Paraments. Project Number PS2608" to the EPA. (See SYNG-PQ-01988076).

RESPONSE TO REQUEST FOR ADMISSION NO. 95:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over

time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 96:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from Exponent's report "Dose-Response Analysis of the Paraquat and Maneb Model for Parkinson's Disease Using Human-Relevant Paraments. Project Number PS2608" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 96:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the

right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 97:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether Exponent's report "Dose-Response Analysis of the Paraquat and Maneb Model for Parkinson's Disease Using Human-Relevant Paraments. Project Number PS2608" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 97:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA

under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 98:

Admit that Syngenta never submitted Exponent's report "An Examination and Analysis of the Role of Paraquat and Maneb in Induced Neurodegeneration of the Substantia Nigra at Representative Human Exposure Doses, Final Report, Project Number PS2608" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 98:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over

time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 99:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether Exponent's report "An Examination and Analysis of the Role of Paraquat and Maneb in Induced Neurodegeneration of the Substantia Nigra at Representative Human Exposure Doses, Final Report, Project Number PS2608" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 99:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA

under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 100:

Admit that "An Examination and Analysis of the Role of Paraquat and Maneb in Induced Neurodegeneration of the Substantia Nigra at Representative Human Exposure Doses, Final Report, Project Number PS2608" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus.

RESPONSE TO REQUEST FOR ADMISSION NO. 100:

Syngenta objects to this Request insofar as this information is equally available to Plaintiffs. Syngenta further objects to this Request as vague, ambiguous, and unduly burdensome as it asks about whether a report "has never been abstracted in a recognized database of scientific and medical literature." Syngenta further objects to this Request to the extent that it asks for historical information that is no longer available or accessible. Syngenta also objects to the extent that this Request asks for information outside of Syngenta's possession, custody, and control. Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not been able to determine whether the referenced study, "An Examination and Analysis of the Role of Paraquat and Maneb in Induced Neurodegeneration of the Substantia Nigra at Representative Human Exposure Doses, Final Report, Project Number PS2608" has never been abstracted in a recognized database of scientific and medical literature

such as Medline, EMBASE, Toxline or Index Medicus. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 101:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether Exponent's report "An Examination and Analysis of the Role of Paraquat and Maneb in Induced Neurodegeneration of the Substantia Nigra at Representative Human Exposure Doses, Final Report, Project Number PS2608" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 101:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to

these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 102:

Admit that Syngenta never submitted Exponent's report "Sensitivity Analyses of the Tanner et al. Case-Control Study of Parkinson's Disease in the Agricultural Health Study, September 10, 2013" to the EPA. (See SYNG-PQ-36932783).

RESPONSE TO REQUEST FOR ADMISSION NO. 102:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta admits that the referenced report was submitted pursuant to a request from the EPA, separate and apart from any adverse event reporting. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies additional information responsive to this Request. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations

under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 103:

Admit that Syngenta never informed the EPA that it obtained additional data from the Farming and Movement Evaluation (FAME) study within the Agricultural Health Study and conducted a sensitivity analysis to assess the results and conclusions.

RESPONSE TO REQUEST FOR ADMISSION NO. 103:

Syngenta objects to this Request phrase "informed the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request as vague and ambiguous as it asks about "additional data" that Syngenta purportedly obtained without citing or referencing what data Plaintiffs are asking about. Syngenta further objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion. Subject to and without waiving its objections, Syngenta incorporates its response to Request for Admission No. 102. Syngenta further admits that it sent raw data used in the referenced analysis, which Syngenta interprets as the document referenced in Request for Admission No. 102, that it has in its possession to the EPA. Syngenta reserves the right to update this response should additional information become available.

REQUEST FOR ADMISSION NO. 104:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether Exponent's report "Sensitivity Analyses of the Tanner et al. Case-Control Study of Parkinson's Disease in the Agricultural Health Study, September 10, 2013" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 104:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that this Committee considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted.

REQUEST FOR ADMISSION NO. 105:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether Exponent's report "Sensitivity Analyses of the Tanner et al. Case-Control Study of Parkinson's Disease in the Agricultural Health Study, September 10, 2013" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 105:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that this Committee considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted.

REQUEST FOR ADMISSION NO. 106:

Admit that Syngenta never submitted the translated study report from the Brazilian regulatory agency (ANVISA) titled "TECHNICAL REASSMENT OPINION NO. 01 of 2015/GGTOX/Anvisa Analysis of the technical reassessment note of the active ingredient paraquat elaborated by Fiocruz" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 106:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA

through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 107:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the study report from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSMENT OPINION NO. 01 of 2015/GGTOX/Anvisa Analysis of the technical reassessment note of the active ingredient paraquat elaborated by Fiocruz" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 107:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period

of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 108:

Admit that the study report from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSMENT OPINION NO. 01 of 2015/GGTOX/Anvisa Analysis of the technical reassessment note of the active ingredient paraquat elaborated by Fiocruz" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus.

RESPONSE TO REQUEST FOR ADMISSION NO. 108:

Syngenta objects to this Request insofar as this information is equally available to Plaintiffs. Syngenta further objects to this Request as vague, ambiguous, and unduly burdensome as it asks about whether a report "has never been abstracted in a recognized database of scientific and medical literature." Syngenta further objects to this Request to the extent that it asks for historical information that is no longer available or accessible. Syngenta also objects to the extent that this Request asks for information outside of Syngenta's possession, custody, and control.

Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not been able to determine whether the technical assessment opinion from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSMENT OPINION NO. 01 of 2015/GGTOX/Anvisa Analysis of the technical reassessment note of the active ingredient paraquat elaborated by Fiocruz" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 109:

Admit that Syngenta never submitted the translated study report from the Brazilian regulatory agency (ANVISA) titled "TECHNICAL REASSESSMENT OPINION NO. 08/GGTOX/Anvisa, of June 13, 2016 Analysis of the contributions to the proposed reassessment of the active ingredient Paraquat supported by the Technical Reassessment Opinion no. 01 of 2015/GGTOX/Anvisa, object of the Public Consultation no. 94 of October 8, 2015" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 109:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that

it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 110:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the study report from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSESSMENT OPINION NO. 08/GGTOX/Anvisa, of June 13, 2016 Analysis of the contributions to the proposed reassessment of the active ingredient Paraquat supported by the Technical Reassessment Opinion no. 01 of 2015/GGTOX/Anvisa, object of the Public Consultation no. 94 of October 8, 2015" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 110:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member

communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 111:

Admit that the study report from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSESSMENT OPINION NO. 08/GGTOX/Anvisa, of June 13, 2016 Analysis of the contributions to the proposed reassessment of the active ingredient Paraquat supported by the Technical Reassessment Opinion no. 01 of 2015/GGTOX/Anvisa, object of the Public Consultation no. 94 of October 8, 2015" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus.

RESPONSE TO REQUEST FOR ADMISSION NO. 111:

Syngenta objects to this Request insofar as this information is equally available to Plaintiffs. Syngenta further objects to this Request as vague, ambiguous, and unduly burdensome

as it asks about whether a report "has never been abstracted in a recognized database of scientific and medical literature." Syngenta further objects to this Request to the extent that it asks for historical information that is no longer available or accessible. Syngenta also objects to the extent that this Request asks for information outside of Syngenta's possession, custody, and control.

Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not been able to determine whether the technical assessment opinion from the Brazilian Regulatory Agency (ANVISA) titled "TECHNICAL REASSESSMENT OPINION NO. 08/GGTOX/Anvisa, of June 13, 2016 Analysis of the contributions to the proposed reassessment of the active ingredient Paraquat supported by the Technical Reassessment Opinion no. 01 of 2015/GGTOX/Anvisa, object of the Public Consultation no. 94 of October 8, 2015" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 112:

Admit that Syngenta never submitted the translated study report from the Brazilian regulatory agency (ANVISA) titled "REASSESSMENT TECHNICAL OPINION No.13/CREAV/GEPOS/GGTOX/ANVISA — version 2, dated January 05th, 2017. It analyzes the proposals submitted by the Reassessment Task Force of the Active Ingredient Paraquat (file No. 291144162) and its questions to Reassessment Technical Opinion No. 08/GGTOX/Anvisa, from June 13th, 2016 (file No. 460883166)" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 112:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects

to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 113:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the study report from the Brazilian Regulatory Agency (ANVISA) titled "REASSESSMENT TECHNICAL OPINION No.13/CREAV/GEPOS/GGTOX/ANVISA — version 2, dated January 05th, 2017. It analyzes the proposals submitted by the Reassessment Task Force of the Active Ingredient Paraquat (file No. 291144162) and its questions to Reassessment Technical Opinion No. 08/GGTOX/Anvisa, from June 13th, 2016 (file No. 460883166)" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 113:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of

communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 114:

Admit that the study report from the Brazilian Regulatory Agency (ANVISA) titled "REASSESSMENT TECHNICAL OPINION No.13/CREAV/GEPOS/GGTOX/ANVISA — version 2, dated January 05th, 2017. It analyzes the proposals submitted by the Reassessment Task Force of the Active Ingredient Paraquat (file No. 291144162) and its questions to Reassessment Technical Opinion No. 08/GGTOX/Anvisa, from June 13th, 2016 (file No. 460883166)" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus.

RESPONSE TO REQUEST FOR ADMISSION NO. 114:

Syngenta objects to this Request insofar as this information is equally available to Plaintiffs. Syngenta further objects to this Request as vague, ambiguous, and unduly burdensome

as it asks about whether a report "has never been abstracted in a recognized database of scientific and medical literature." Syngenta further objects to this Request to the extent that it asks for historical information that is no longer available or accessible. Syngenta also objects to the extent that this Request asks for information outside of Syngenta's possession, custody, and control.

Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not been able to determine whether the technical assessment opinion from the Brazilian Regulatory Agency (ANVISA) titled "REASSESSMENT TECHNICAL OPINION No.13/CREAV/GEPOS/GGTOX/ANVISA — version 2, dated January 05th, 2017. It analyzes the proposals submitted by the Reassessment Task Force of the Active Ingredient Paraquat (file No. 291144162) and its questions to Reassessment Technical Opinion No. 08/GGTOX/Anvisa, from June 13th, 2016 (file No. 460883166)" has never been abstracted in a recognized database of scientific and medical literature such as Medline, EMBASE, Toxline or Index Medicus. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 115:

Admit that Syngenta never submitted the report "CEHC 2540: THE ACUTE INHALATION TOXICITY OF CC-15400 (SX-1711) IN RATS" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 115:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 116:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "CEHC 2540: THE ACUTE INHALATION TOXICITY OF CC-15400 (SX-1711) IN RATS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 116:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as

it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 117:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "CEHC 2540: THE ACUTE INHALATION TOXICITY OF CC-15400 (SX-1711) IN RATS" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 117:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the

term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta states that the referenced report was completed in 1986. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 118:

Admit that Syngenta never submitted the report "Brouwer, D.H. and Roussel, C.-H. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in vines. TNO Report V6420/01. 15th May 2007" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 118:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects

to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 119:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H. and Roussel, C.-H. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in vines. TNO Report V6420/01. 15th May 2007" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 119:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal

Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 120:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H. and Roussel, C.-H. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in vines. TNO Report V6420/01. 15th May 2007" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 120:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee

member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 121:

Admit that Syngenta never submitted the report "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 121:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that

it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 122:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 122:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of

communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta denies that Syngenta's PRF Approach Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" should be reported to the EPA under FIFRA section 6(a)(2). Syngenta further states that its PRF Approach Committee did consider whether to report this study to the EPA and ultimately referred the study to its US PRF Committee. *See, e.g.*, SYNG-PQ-06528530; SYNG-PQ-02415384, at -02415412 to -02415416; M. Dixon Dep. Ex. 17.

REQUEST FOR ADMISSION NO. 123:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 123:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee

member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta denies that Syngenta's US PRF Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" should be reported to the EPA under FIFRA section 6(a)(2). Syngenta further states that its US PRF Committee did consider whether to report this study to the EPA. *See, e.g.*, SYNG-PQ-02415384, at -02415412-16; M. Dixon Dep. Ex. 17.

REQUEST FOR ADMISSION NO. 124:

Admit that Syngenta never informed the EPA that two workers involved in the study "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b" had measurable Paraquat exposures in excess of the Acceptable Operator Exposure Level.

RESPONSE TO REQUEST FOR ADMISSION NO. 124:

Syngenta objects to this Request because it suggests that Syngenta had an obligation to inform the EPA that two workers involved in the cited study had "measurable paraquat exposure in excess of the Acceptable Operator Exposure Level." Syngenta further objects to the term "Acceptable Operator Exposure Level" as undefined, vague, and ambiguous. Syngenta further objects to the phrase "informed the EPA" as vague and ambiguous. Syngenta also objects to this

Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta denies that it never informed the EPA about an incident with two workers involved in the study "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following repeated days' habitual use in vines. TNO Report V6420/02. 15th May 2007b." *See* SYNG-PQ-02415384 The exposures were classified as H-E, which is the classification for human exposure incidents where there were no known health impacts. This classification is consistent with the EPA's guidance regarding 6(a)(2) reporting. Syngenta admits that it did not include additional information about the workers' exposure levels. Syngenta states that it was not required to share any further details of the exposure with the EPA. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 125:

Admit that Syngenta never submitted the report "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in bananas. TNO Report V6420/04. 16th August 2007c" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 125:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that

it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 126:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in bananas. TNO Report V6420/04. 16th August 2007c" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 126:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of

communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has found evidence that this study was considered by Syngenta's Potentially Referrable Findings Approach Committee and its US Potentially Referrable Findings Committee. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies any additional information relevant to this Request. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 127:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in bananas. TNO Report V6420/04. 16th August 2007c" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 127:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing

statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has found evidence that this study was considered by Syngenta's Potentially Referrable Findings Approach Committee and its US Potentially Referrable Findings Committee. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies additional information relevant to this Request. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 128:

Admit that Syngenta never informed the EPA that two workers involved in the study "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in bananas. TNO Report V6420/04. 16th August 2007c" had measurable Paraquat exposures in excess of the Acceptable Operator Exposure Level.

RESPONSE TO REQUEST FOR ADMISSION NO. 128:

Syngenta objects to this Request because it suggests that Syngenta had an obligation to inform the EPA that two workers involved in the cited study "had measurable paraquat exposure in excess of the Acceptable Operator Exposure Level." Syngenta further objects to the term "Acceptable Operator Exposure Level" as undefined, vague, and ambiguous. Syngenta also objects to the phrase "informed the EPA" as vague and ambiguous. Syngenta also objects to this Request to the extent that it calls for expert testimony. Syngenta also objects to this Request to the extent that it misrepresents findings in the cited study. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of informing the EPA that two workers involved in the cited study "had measurable paraquat exposure in excess of the Acceptable Operator Exposure Level," as this Request states. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 129:

Admit that Syngenta never submitted the report "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' habitual use in bananas. TNO Report V6420/05. 29th August 2007d." to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 129:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting this report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 130:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' habitual use in bananas. TNO Report V6420/05. 29th August 2007d." should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 130:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 131:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' habitual use in bananas. TNO Report V6420/05. 29th August 2007d." should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 131:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited

or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 132:

Admit that Syngenta never submitted the report "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in lucerne. TNO Report V6420/03. 11th June 2007e" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 132:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 133:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in lucerne. TNO Report V6420/03. 11th June 2007e" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 133:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving

obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 134:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following a single day's habitual use in lucerne. TNO Report V6420/03. 11th June 2007e" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 134:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to

these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 135:

Admit that Syngenta never submitted the report "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' use in bananas with PPE according to label recommendation. TNO Report V6420/06. 6th September 2007a" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 135:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 136:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' use in bananas with PPE according to label recommendation. TNO Report V6420/06. 6th September 2007a" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 136:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta states that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving

obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 137:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Brouwer, D.H., Roussel, C.-H. and Links, I. Formulation R-Bix (A9409AL): Measurement of excreted paraquat in workers following three consecutive days' use in bananas with PPE according to label recommendation. TNO Report V6420/06. 6th September 2007a" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 137:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 138:

Admit that Syngenta never submitted the report "REPORT NO: CTL/P/1467 PARAQUAT: PENETRATION THROUGH PROTECTIVE CLOTHING MATERIALS FROM A MALAYSIAN 'GRAMOXONE' FORMULATION" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 138:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 139:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "REPORT NO: CTL/P/1467 PARAQUAT: PENETRATION THROUGH PROTECTIVE CLOTHING MATERIALS FROM A MALAYSIAN 'GRAMOXONE' FORMULATION" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 139:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 140:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "REPORT NO: CTL/P/1467 PARAQUAT: PENETRATION THROUGH PROTECTIVE CLOTHING MATERIALS FROM A MALAYSIAN 'GRAMOXONE' FORMULATION" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 140:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 141:

Admit that Syngenta never submitted the report "REPORT NO: CTL/L/168O PARAQUAT: ABSORPTION THROUGH WELLINGTON AND TROOPER BOOT FROM GRAMOXONE" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 141:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 142:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "REPORT NO: CTL/L/168O PARAQUAT: ABSORPTION THROUGH WELLINGTON AND TROOPER BOOT FROM GRAMOXONE" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 142:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 143:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "REPORT NO: CTL/L/168O PARAQUAT: ABSORPTION THROUGH WELLINGTON AND TROOPER BOOT FROM GRAMOXONE" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 143:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 144:

Admit that Syngenta never submitted the report "Campbell, et al., 2014, PARAQUAT PBPK MODEL FOR CROSS-SPECIES DOSIMETRY Date: 04/10/2014" (SYNG-PQ-04225646) to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 144:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 145:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Campbell, et al., 2014, PARAQUAT PBPK MODEL FOR CROSS-SPECIES DOSIMETRY Date: 04/10/2014" (SYNG-PQ-04225646) should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 145:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 146:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Campbell, et al., 2014, PARAQUAT PBPK MODEL FOR CROSS-SPECIES DOSIMETRY Date: 04/10/2014" (SYNG-PQ-04225646) should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 146:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 147:

Admit that Syngenta never submitted the report "REPORT NO: CTL/L/2109 PARAQUAT: ANALYSIS OF URINE AND PLASMA SAMPLES FROM A MALAYSIAN OPERATOR EXPOSURE STUDY" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 147:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 148:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "REPORT NO: CTL/L/2109 PARAQUAT: ANALYSIS OF URINE AND PLASMA SAMPLES FROM A MALAYSIAN OPERATOR EXPOSURE STUDY" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 148:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 149:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "REPORT NO: CTL/L/2109 PARAQUAT: ANALYSIS OF URINE AND PLASMA SAMPLES FROM A MALAYSIAN OPERATOR EXPOSURE STUDY" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 149:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 150:

Admit that Syngenta never submitted the report "December 2009 Paraquat Operator Exposure: A review of operator exposure studies Author: Graham Chester & Andy Cook" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 150:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 151:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "December 2009 Paraquat Operator Exposure: A review of operator exposure studies Author: Graham Chester & Andy Cook" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 151:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA

guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 152:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "December 2009 Paraquat Operator Exposure: A review of operator exposure studies Author: Graham Chester & Andy Cook" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 152:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 153:

Admit that Syngenta never submitted the report "Report No. WER-006: Findlay, et al. PARAQUAT: WORKER EXPOSURE DURING APPLICATION OF GAMOXONE WITH A CONTROLLED DROPLET APPLICATION (CDA) MICRON 'HANDY' SPRAYER" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 153:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA

has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 154:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee never considered whether the results from "Report No. WER-006: Findlay, et al. PARAQUAT: WORKER EXPOSURE DURING APPLICATION OF GAMOXONE WITH A CONTROLLED DROPLET APPLICATION (CDA) MICRON 'HANDY' SPRAYER" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 154:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal PRF Committee meetings or if this Request is seeking information about any passing statement between any internal PRF Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal PRF Committee member communicated to any other internal PRF Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was

considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 155:

Admit that Syngenta's internal 6(a)(2) Committee never considered whether the results from "Report No. WER-006: Findlay, et al. PARAQUAT: WORKER EXPOSURE DURING APPLICATION OF GAMOXONE WITH A CONTROLLED DROPLET APPLICATION (CDA) MICRON 'HANDY' SPRAYER" should be reported to the EPA under FIFRA section 6(a)(2).

RESPONSE TO REQUEST FOR ADMISSION NO. 155:

Syngenta objects to the term "considered" as undefined, vague, ambiguous, and overbroad as Syngenta does not know whether this refers to, for example, formal discussions during routine internal 6(a)(2) Committee meetings or if this Request is seeking information about any passing statement between any internal 6(a)(2) Committee members at any point during an undefined period of time. It is not feasible to investigate everything that any internal 6(a)(2) Committee member communicated to any other internal 6(a)(2) Committee member through any potential medium of communication during an undefined period of time. Syngenta further objects to the term "internal 6(a)(2) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that, based on a reasonable investigation to date, it has not found evidence that it considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the

right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 156:

Admit that Syngenta never submitted the report "CTL/HR2357/SUMMARY/REPORT PARAQUAT 200G/L SPRAY STRENGTH SOLUTION: PRELIMINARY INVESTIGATIONS OF THE 4-HOUR ACUTE INHALATION TOXICITY IN THE RAT" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 156:

Syngenta objects to the phrase "submitted . . . to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been

responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 157:

Admit that Syngenta's internal Potentially Referrable Findings (PRF) Committee determined that the results from "CTL/HR2357/SUMMARY/REPORT PARAQUAT 200G/L SPRAY STRENGTH SOLUTION: PRELIMINARY INVESTIGATIONS OF THE 4-HOUR ACUTE INHALATION TOXICITY IN THE RAT" should be reported to the EPA under FIFRA section 6(a)(2) because the clinical effects noted were treatment related and because of death in extremis of one animal at a very low concentration

RESPONSE TO REQUEST FOR ADMISSION NO. 157:

Syngenta objects to the phrase "determined that the results . . . should be reported to the EPA" as vague and ambiguous. Syngenta also objects to the terms "clinical effects," "treatment related," and "very low concentration" as undefined, vague, and ambiguous. Syngenta further objects to the term "internal Potentially Referrable Findings (PRF) Committee" as undefined, vague, and ambiguous because it is not clear whether this term refers to Syngenta's PRF Approach Committee, US PRF Committee, or some other internal Syngenta committee. Syngenta objects to this Request to the extent that it mischaracterizes a document or the roles of the various committees at play. Syngenta also objects to this Request as it calls for expert testimony. Finally, Syngenta objects to this Request as it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that Zeneca's Central Toxicology Laboratory's Potentially Referrable Findings (PRF) Committee considered this study. *See* Phil Botham Ex. 26 (September 17, 2024). Syngenta states that Dr. Phil Botham referred to this committee as the "PRF Approach Committee" that "would hand its recommendations over to the US committee." P. Botham Dep. Tr. 191:21-192:9 (September 17, 2024). Syngenta admits that the Central Toxicology Laboratory's Potentially Referrable Findings (PRF) Committee referred

this study to the US Potentially Referrable Findings Committee. *See* Phil Botham Ex. 26 (September 17, 2024). Syngenta states that the document speaks for itself. Syngenta further admits that, based on a reasonable investigation to date, it has not found evidence that the US Potentially Referrable Findings Committee considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and developed and followed processes designed to comply with its evolving obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat. Unless specifically admitted herein, denied.

REQUEST FOR ADMISSION NO. 158:

Admit that Syngenta rejected the recommendation of the PRF Committee to report the results of "CTL/HR2357/SUMMARY/REPORT PARAQUAT 200G/L SPRAY STRENGTH SOLUTION: PRELIMINARY INVESTIGATIONS OF THE 4-HOUR ACUTE INHALATION TOXICITY IN THE RAT" to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 158:

Syngenta objects to the terms "rejected," "PRF Committee," and "report the results" as undefined, vague, and ambiguous. Syngenta objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta also objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation to date, Syngenta admits that it has not found evidence that the US Potentially Referrable Findings

Committee considered submitting this report to the EPA under 6(a)(2). Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 159:

Admit that "CTL/HR2357/SUMMARY/REPORT PARAQUAT 200G/L SPRAY STRENGTH SOLUTION: PRELIMINARY INVESTIGATIONS OF THE 4-HOUR ACUTE INHALATION TOXICITY IN THE RAT" examined the inhalation toxicity of Paraquat combined with a non-ionic surfactant and found that a rat died at a dose of Paraquat ten times lower than what would be expected if no surfactant was used.

RESPONSE TO REQUEST FOR ADMISSION NO. 159:

Syngenta objects to the term "non-ionic surfactant" and the phrase "ten times lower than" as vague and ambiguous. Syngenta further objects to the extent that this Request suggests the rat's death can be definitively attributed to its dose of paraquat.

To the extent this Request mischaracterizes "CTL/HR2357/SUMMARY/REPORT PARAQUAT 200G/L SPRAY STRENGTH SOLUTION: PRELIMINARY INVESTIGATIONS OF THE 4-HOUR ACUTE INHALATION TOXICITY IN THE RAT" and conclusions by selectively omitting or emphasizing certain language or by drawing related inferences, they are denied.

Subject to and without waiving its objections, Syngenta admits the study examined the acute-inhalation effects of a paraquat-Agral formulation on rats, and that evidence of the cause of

the rat's death was inconclusive. Syngenta states that the document speaks for itself. If not specifically admitted herein, denied.

REQUEST FOR ADMISSION NO. 160:

Admit that Syngenta advises users in the U.S. to mix a non-ionic surfactant with Paraquat prior to spraying Paraquat.

RESPONSE TO REQUEST FOR ADMISSION NO. 160:

Syngenta objects to the phrase "non-ionic surfactant" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that its U.S. labels recommend that users add a non-ionic surfactant to the spray mixture prior to spraying paraquat.

REQUEST FOR ADMISSION NO. 161:

Admit that Syngenta did submit to the EPA a different 4-Hour Acute Inhalation Toxicity study in the Rat titled "HR2533 Sponsor Report Number: Study Title: PARAQUAT DICHLORIDE TECHNICAL MATERIAL - 4-HOUR ACUTE INHALATION TOXICITY STUDY IN RATS" that examined only the inhalation toxicity of Paraquat without a surfactant.

RESPONSE TO REQUEST FOR ADMISSION NO. 161:

Syngenta objects to the phrases "submit to the EPA," "a different," and "surfactant" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that the referenced study was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that "HR2533 Sponsor Report Number: Study Title: PARAQUAT DICHLORIDE TECHNICAL MATERIAL - 4-HOUR ACUTE INHALATION TOXICITY STUDY IN RATS" was submitted to the EPA. Syngenta further states that, based on a reasonable investigation, it has not been able to determine the exact formulation used in the study "HR2533 Sponsor Report Number: Study Title: PARAQUAT DICHLORIDE TECHNICAL MATERIAL - 4-HOUR ACUTE INHALATION TOXICITY STUDY IN RATS" from the details provided in the in the study. Syngenta further states that the purity of the test substance used in the study was 33.4% weight per weight paraquat cation and 46.1% weight per weight paraquat dichloride and that "the neat test material was diluted in deionized water to provide a 0.5%v/v solution (groups 1 and 3) and a 1.0%v/v solution for group 2." SYNG-PQ-21944254.

REQUEST FOR ADMISSION NO. 162:

Admit that the formulation of Paraquat used in study HR2533 which did not contain a surfactant was ten times less fatal than the formulation of Paraquat used in study HR257 which did contain a surfactant.

RESPONSE TO REQUEST FOR ADMISSION NO. 162:

Syngenta objects to the phrases "surfactant" and "ten times less fatal" as vague and ambiguous. Syngenta further objects to this Request as incomplete and misleading as written. Subject to and without waiving its objections, notes that it was unable to identify a study titled "HR257." In light of the foregoing, Syngenta denies this request as written.

REQUEST FOR ADMISSION NO. 163:

Admit that the formulation in the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study" contained a surfactant.

RESPONSE TO REQUEST FOR ADMISSION NO. 163:

Syngenta objects to the phrase "surfactant" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that the formulation in the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis - Contemporary Control Study" contained a surfactant. SYNG-PQ-05608996.

REQUEST FOR ADMISSION NO. 164:

Admit that three out of twelve dogs died after ingesting the surfactant-containing Paraquat formulation in the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study".

RESPONSE TO REQUEST FOR ADMISSION NO. 164:

Syngenta objects to the phrase "surfactant-containing Paraquat formulation" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that two animals dosed with 0.64 mL A3879EX/kg were euthanized in extremis on Day 5. The remaining two animals in this group appeared normal, with no significant observations noted in the period after treatment. Syngenta admits that one additional animal dosed with 1.28 mL A3879EX/kg was euthanized in extremis on Day 4. All other animals survived the trial period. SYNG-PQ-06700353.

REQUEST FOR ADMISSION NO. 165:

Admit that the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study" was not submitted to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 165:

Syngenta objects to the phrase "submitted to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that

it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, and based on a reasonable investigation, Syngenta admits that it does not have record of submitting the referenced report as part of FIFRA's 6(a)(2) process. Syngenta's investigation into this Request is ongoing, and Syngenta reserves the right to supplement this Request if it identifies information suggesting that this information was considered or submitted. Syngenta further states that FIFRA has evolved over time and EPA guidance regarding 6(a)(2) has similarly evolved; Syngenta has consistently been responsive to these changes and complied with its obligations under FIFRA 6(a)(2), and the EPA has never cited or sanctioned Syngenta for failing to comply with its 6(a)(2) disclosure obligations with respect to paraquat.

REQUEST FOR ADMISSION NO. 166:

Admit that the formulation in the study "Paraquat SL (A7813K) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study" did not contain a surfactant.

RESPONSE TO REQUEST FOR ADMISSION NO. 166:

Syngenta objects to the phrase "surfactant" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that the formulation in the study "Paraquat SL (A7813K) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis - Contemporary Control Study" did not contain a surfactant.

REQUEST FOR ADMISSION NO. 167:

Admit that only one out of twelve dogs died after ingesting the non-surfactant-containing Paraquat formulation in the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study"

RESPONSE TO REQUEST FOR ADMISSION NO. 167:

Syngenta objects to the phrase "non-surfactant-containing Paraquat formulation" as vague and ambiguous. Subject to and without waiving its objections, Syngenta denies that one out of twelve dogs died after ingesting the non-surfactant-containing paraquat formulation in the study "Paraquat SL (A3879EX) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis - Contemporary Control Study."

REQUEST FOR ADMISSION NO. 168:

Admit that the study "Paraquat SL (A7813K) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study" was submitted to the EPA.

RESPONSE TO REQUEST FOR ADMISSION NO. 168:

Syngenta objects to the phrase "submitted to the EPA" as vague and ambiguous. For example, it is not clear whether this Request asks solely about information submitted to the EPA through the 6(a)(2) submission process, or whether this Request also encompasses more informal correspondence and notification processes. Syngenta also objects to this Request to the extent that it suggests that this report was reportable under FIFRA Section 6(a)(2). Syngenta further objects to this Request to the extent that it calls for expert testimony. Finally, Syngenta objects to this Request to the extent that it calls for a legal conclusion.

Subject to and without waiving its objections, Syngenta admits that the study "Paraquat SL (A7813K) Acute Toxicity in Beagle Dogs with Toxicokinetic Analysis -Contemporary Control Study" was submitted to the EPA. *See* SYNG-PQ-02400408.

REQUEST FOR ADMISSION NO. 169:

Admit that surfactants will normally increase the absorption of paraquat and hence increase its toxicity.

RESPONSE TO REQUEST FOR ADMISSION NO. 169:

Syngenta objects to the phrases "surfactants" and "absorption of paraquat" as vague and ambiguous. Syngenta further objects that this Request calls for expert testimony.

Subject to and without waiving its objections, Syngenta states there are numerous distinct types of surfactants, and hundreds of distinct surfactants within each type. In addition to the type of surfactant, the route of exposure (e.g., oral or dermal) also impacts how surfactants may impact paraquat absorption—if at all. Multiple studies have shown that non-ionic surfactants do not significantly impact dermal absorption. *See e.g.*, SYNG-PQ-19339827; SYNG-PQ-02107996. In light of the foregoing, Syngenta denies that surfactants will normally increase the absorption of paraquat and hence increase its toxicity.

REQUEST FOR ADMISSION NO. 170:

Admit that Syngenta never informed the EPA that the use of a dust mask filter or fabric mask may exacerbate the product user's exposure to Paraquat.

RESPONSE TO REQUEST FOR ADMISSION NO. 170:

Syngenta objects to the phrases "informed the EPA" and "may exacerbate" as vague and ambiguous. Syngenta further objects to this Request to the extent that it suggests Syngenta had a legal obligation to "inform the EPA" about the contents of this Request. Syngenta further objects to this Request because it is more appropriately the subject of expert testimony Subject to and without waiving its objections, Syngenta states that it cannot admit or deny the Request as written given the many ambiguities in the Request. Syngenta is willing to meet and confer with Plaintiffs regarding the need for this Request.

REQUEST FOR ADMISSION NO. 171:

Admit that the Paraquat that was initially marketed and sold in the United States was manufactured using a High Temperature Sodium (HTS) process.

RESPONSE TO REQUEST FOR ADMISSION NO. 171:

Syngenta objects to the phrase "High Temperature Sodium (HTS) process" as vague and ambiguous. Syngenta further objects to this Request to the extent that it seeks information that is not in Syngenta's custody or control, or otherwise maintained in the ordinary course of business. Given the passage of more than 55 years since paraquat first became available for sale in the United States, as well as the numerous corporate changes that resulted in the creation of the Syngenta entities that are defendants in the present suit, it is impossible for Syngenta to answer this Request completely, and Syngenta must necessarily rely on the limited historical information available. As a result, Syngenta makes this response based on the information available to it at this time and reserves the right to modify or supplement this Response if further information is discovered.

Subject to and without waiving its objections, Syngenta admits that it manufactured paraquat at a High Temperature Sodium (HTS) plant between 1961 and 1964. Syngenta further states that it stopped operating its HTS paraquat plant between 1964-1966.

REQUEST FOR ADMISSION NO. 172:

Admit that the Paraquat that was initially marketed and sold in the United States contained terpyridines.

RESPONSE TO REQUEST FOR ADMISSION NO. 172:

Syngenta objects to the phrase "terpyridines" as vague and ambiguous. Syngenta further objects to this Request to the extent that it seeks information that is not in Syngenta's custody or control, or otherwise maintained in the ordinary course of business. Given the passage of more than 55 years since paraquat first became available for sale in the United States, as well as the numerous corporate changes that resulted in the creation of the Syngenta entities that are defendants in the present suit, it is impossible for Syngenta to answer this Request completely, and Syngenta must necessarily rely on the limited historical information available. As a result,

Syngenta makes this response based on the information available to it at this time and reserves the right to modify or supplement this Response if further information is discovered.

Subject to and without waiving its objections, Syngenta admits that terpyridines are a potential impurity that may be produced by the High Temperature Sodium (HTS) process. Syngenta stopped operating its HTS paraquat plant in between 1964-1966. By way of further response, given the passage of time, Syngenta cannot confirm or deny whether paraquat containing terpyridines was marketed and sold in the United States during that time.

REQUEST FOR ADMISSION NO. 173:

Admit that terpyridines are extremely toxic in minute quantities.

RESPONSE TO REQUEST FOR ADMISSION NO. 173:

Syngenta objects to the phrases "terpyridines," "extremely toxic," and "minute quantities" as vague and ambiguous. Syngenta further objects to this Request to the extent that it calls for expert testimony. Subject to and without waiving its objections, Syngenta states that it cannot answer this Request as drafted.

REQUEST FOR ADMISSION NO. 174:

Admit that terpyridines are neurotoxic.

RESPONSE TO REQUEST FOR ADMISSION NO. 174:

Syngenta objects to the phrases "terpyridines" and "neurotoxic" as vague and ambiguous. Syngenta further objects that this Request calls for expert testimony. Subject to and without waiving its objections, Syngenta states that it is willing to meet and confer with Plaintiffs about the necessity of an RFA Response from Syngenta on this scientific topic as opposed to expert testimony.

REQUEST FOR ADMISSION NO. 175:

Admit that death can occur from dermal exposure to Paraquat.

RESPONSE TO REQUEST FOR ADMISSION NO. 175:

Syngenta objects to "dermal exposure" as vague and ambiguous. Subject to and notwithstanding its objections, Syngenta admits that, in certain laboratory conditions that involved significant dermal exposure, dermal exposure has resulted in laboratory animal death. Syngenta further states that those experiments involved extreme levels of exposure that far exceed dermal exposure in humans.

REQUEST FOR ADMISSION NO. 176:

Admit that Paraquat is a skin irritant.

RESPONSE TO REQUEST FOR ADMISSION NO. 176:

Syngenta objects to the phrase "skin irritant" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that repeated, prolonged exposure to paraquat concentrate can be irritating to the skin, but diluted, spray-strength material is not considered a significant skin irritant.

REQUEST FOR ADMISSION NO. 177:

Admit that non-ionic surfactants are skin irritants.

RESPONSE TO REQUEST FOR ADMISSION NO. 177:

Syngenta objects to the phrases "non-ionic surfactants" and "skin irritants" as vague and ambiguous. Subject to and without waiving its objections, Syngenta states there are hundreds of non-ionic surfactants with distinct physicochemical properties that may bear on skin irritation. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 178:

Admit that Paraquat is corrosive to the skin.

RESPONSE TO REQUEST FOR ADMISSION NO. 178:

Syngenta objects to the phrase "corrosive to the skin" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that repeated, prolonged exposure to paraquat concentrate can be corrosive to the skin, but diluted, spray-strength material is not considered corrosive to the skin.

REQUEST FOR ADMISSION NO. 179:

Admit that non-ionic surfactants are corrosive to the skin.

RESPONSE TO REQUEST FOR ADMISSION NO. 179:

Syngenta objects to the phrases "non-ionic surfactants" and "corrosive to the skin" as vague and ambiguous. Subject to and without waiving its objections, Syngenta states there are hundreds of non-ionic surfactants with distinct physicochemical properties that may bear on whether the compound is considered corrosive to the skin. In light of the foregoing, Syngenta can neither admit nor deny this Request.

REQUEST FOR ADMISSION NO. 180:

Admit that there were a total of 34 reported nosebleeds from Syngenta employees working in Paraquat manufacturing plants between September 1966 and March 1968. (See SYNG-PQ-02518937).

RESPONSE TO REQUEST FOR ADMISSION NO. 180:

Syngenta objects to this Request as misleading and seeking irrelevant information. The total of 34 reported nosebleeds in SYNG-PQ-02518937 includes workers exposed to Bipyridyl. Subject to and without waiving its objections, Syngenta admits that there were a total of 34

reported nosebleeds from Syngenta employees working in paraquat manufacturing plants between September 1966 and March 1968.

REQUEST FOR ADMISSION NO. 181:

Admit that Syngenta received reports of fatal Paraquat poisoning through inhalation by 1973.

RESPONSE TO REQUEST FOR ADMISSION NO. 181:

Syngenta objects to the phrase "fatal Paraquat poisoning through inhalation" as vague and ambiguous. Subject to and without waiving its objections, Syngenta denies that, by 1973, it received reports of fatal paraquat poisoning through inhalation in occupational settings by those using paraquat according to its labeled instructions. Syngenta further denies that it has received any reports of fatalities solely through inhalation.

REQUEST FOR ADMISSION NO. 182:

Admit that Syngenta studies have confirmed that spray particles of Paraquat can be deposited in the oro-nasal region of a product user.

RESPONSE TO REQUEST FOR ADMISSION NO. 182:

Syngenta objects to the phrases "spray particles," "deposited," and "product user" as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that, due to its local irritant properties, nosebleeds attributable to irritation of the nasal mucosa have been reported in studies evaluating paraquat in occupational use. Syngenta further states that paraquat's particle size during application is too large to result in significant respiration.

REQUEST FOR ADMISSION NO. 183:

Admit that Paraquat can bypass the blood-brain barrier when absorbed through the nasal membrane.

RESPONSE TO REQUEST FOR ADMISSION NO. 183:

Syngenta objects to this Request as vague and ambiguous with respect to the phrase "blood-brain barrier" which is not defined, and which may refer to a complex set of tissues or transport processes within the brain and surrounding tissues. Syngenta further objects to the undefined phrase "nasal membrane." Syngenta further objects that the word "bypass" is neither defined nor clear on its face. In addition, Syngenta objects to this Request as overbroad, as it seeks information regarding paraquat "bypass[ing]" the blood-brain barrier generally, and not the subject of Plaintiffs' claims, which is Parkinson's disease. Syngenta further objects to the extent that this Request asks for conclusions that are more properly the subject of expert testimony.

Subject to and without waiving its objections, Syngenta admits that small amounts of paraquat can enter the brains of people who have been exposed to lethal or near-lethal doses of paraquat that are thousands of times higher than those encountered by paraquat users under normal conditions and that overwhelm the body's natural defenses. Syngenta further admits that research has shown that even where humans are exposed to near-lethal doses of paraquat, they do not develop any signs of parkinsonism. Syngenta also specifically denies that paraquat has been found in the brains of humans using paraquat for its intended purpose and in accordance with the label instructions.

REQUEST FOR ADMISSION NO. 184:

Admit that Syngenta sells and/or has sold pesticides containing the ingredient Maneb (manganese ethylene bisdithiocarbamate).

RESPONSE TO REQUEST FOR ADMISSION NO. 184:

Syngenta objects to this Request on the grounds of relevance as no plaintiff in this case alleges that he or she used paraquat in conjunction with Maneb. Syngenta further objects that this Request is overbroad and unduly burdensome because it is not limited by geographic scope and

thus includes pesticides sold in states and countries not at issue in this case. Subject to and without waiving its objections, Syngenta admits that it has sold products containing the ingredient manganese ethylene bisdithiocarbamate.

REQUEST FOR ADMISSION NO. 185:

Admit that Maneb, when used on its own without other pesticides, does not cause Parkinson's Disease in humans.

RESPONSE TO REQUEST FOR ADMISSION NO. 185:

Syngenta objects to this Request on the grounds of relevance as no plaintiff in this case alleges that he or she used paraquat in conjunction with Maneb. Syngenta objects that this Request calls for improper expert testimony. Subject to and without waiving its objections, Syngenta admits that manganese ethylene bisdithiocarbamate does not cause Parkinson's disease.

REQUEST FOR ADMISSION NO. 186:

Admit that Syngenta has never included a warning for Parkinson's Disease or neurotoxicity on any of the labels of its pesticides containing maneb.

RESPONSE TO REQUEST FOR ADMISSION NO. 186:

Syngenta objects to this Request on the grounds of relevance, given that Plaintiffs allege that paraquat caused their Parkinson's disease and there are no allegations in this case that Plaintiffs used paraquat in conjunction with Maneb. Syngenta further objects to the phrase "warning for Parkinson's disease" as vague. Subject to and without waiving its objections, Syngenta admits that it has not included a warning regarding neurotoxicity or Parkinson's disease on labels for products containing manganese ethylene bisdithiocarbamate.

REQUEST FOR ADMISSION NO. 187:

Admit that Syngenta has never included a warning for Parkinson's Disease on any label of any pesticide product it sells or has sold.

RESPONSE TO REQUEST FOR ADMISSION NO. 187:

Syngenta objects on the grounds of relevance to the extent that this Request concerns products other than paraquat. Syngenta further objects to this Request as misleading, given that the EPA has determined that there is "insufficient epidemiological evidence of a clear associative or causal relationship" between paraquat exposure and the development of Parkinson's Disease. Syngenta denies that such a warning would be appropriate. Subject to and without waiving its objections, Syngenta admits that it has never submitted a request to the EPA to include a warning related to Parkinson's disease on any product label.

REQUEST FOR ADMISSION NO. 188:

Admit that Syngenta has never included a warning for Parkinson's Disease on any label of any pesticide product it sells or has sold.

RESPONSE TO REQUEST FOR ADMISSION NO. 188:

Syngenta objects on the grounds of relevance to the extent that this Request concerns products other than paraquat. Syngenta further objects to this Request as misleading, given that the EPA has determined that there is "insufficient epidemiological evidence of a clear associative or causal relationship" between paraquat exposure and the development of Parkinson's Disease. Syngenta denies that such a warning would be appropriate. Subject to and without waiving its objections, Syngenta admits that it has never submitted a request to the EPA to include a warning related to Parkinson's disease on any product label.

REQUEST FOR ADMISSION NO. 189:

Admit that Syngenta sells pesticides containing the following active ingredients: Abamectin, Acibenzolar-S-methyl, Pydiflumetofen, Ametryn, Atrazine, Azoxystrobin, benoxacor, Benzovindiflupyr, Bicyclopyrone, Bromoxynil Octanoate, ChlorantraniIiprole, Chlorothalonil, Clodinafop-ropargyl, Cloransulam-methyl, copper OH, Cyantraniliprole, Cyproconazole, Cyprodinil, Cyromazine, Dicamba, Difenoconazole, Difenoconazole + Fludioxonil, Diquat dibromide, Emamectin benzoate, Fenoxaprop-P-ethyl, Florasulam, Fluazifop-P-butyl, Fluazinam,

Fludioxonil, Flumetralin, Fluroxypyr 1-methylheptyl ester, Fluxofenim, Fomesafen, Glyphosate, Lambda-cyhalothrin, Mancozeb, Mandipropamid, MCPA, Mefenoxam, Mesotrione, Metribuzin, Oxathiapiprolin, Pasteuria nishizawae-Pn1, Picarbutrazox, Pinoxaden, Primisulfuron-methyl, Prometryn, Propiconazole, Prosulfuron, Pydiflumetofen, Pyroxasulfone, S-Metolachlor, Sedaxane, Simazine, Sodium Salt of Dicamba, Sodium Salt of Fomesafen, Spinosad A, Spinosad D, Sulfentrazone, Tefluthrin, THIABENDAZ, Thiabendazole, Thiamethoxam, Triasulfuron, Trifloxysulfuron-sodium, and Trinexapac-ethyl, Zinc (Zn).

RESPONSE TO REQUEST FOR ADMISSION NO. 189:

Syngenta objects on the grounds of relevance; the compound at issue in this case is paraquat, any other compounds Syngenta may or may not sell are irrelevant. Syngenta further objects that this Request is overbroad and unduly burdensome because it is not limited by geographic scope and thus includes pesticides sold in states and countries not at issue in this case. Syngenta further objects to the undefined phrase "active ingredients" as vague and ambiguous.

Subject to and without waiving its objections, Syngenta admits that it currently sells crop protection products containing the following active ingredients: Abamectin, Acibenzolar-S-methyl, Pydiflumetofen, Ametryn, Atrazine, Azoxystrobin, benoxacor, Benzovindiflupyr, Bicyclopyrone, Bromoxynil Octanoate, ChlorantraniIiprole, Chlorothalonil, Clodinafop-ropargyl, Cloransulam-methyl, copper OH, Cyantraniliprole, Cyproconazole, Cyprodinil, Cyromazine, Difenoconazole, Difenoconazole + Fludioxonil, Diquat dibromide, Emamectin benzoate, Fenoxaprop-P-ethyl, Florasulam, Fluazifop-P-butyl, Fluazinam, Fludioxonil, Flumetralin, Fluroxypyr 1-methylheptyl ester, Fluxofenim, Glyphosate, Lambda-cyhalothrin, Mancozeb, Mandipropamid, MCPA, Mefenoxam, Mesotrione, Metribuzin, Oxathiapiprolin, Pasteuria nishizawae-Pn1, Picarbutrazox, Pinoxaden, Primisulfuron-methyl, Prometryn, Propiconazole, Prosulfuron, Pydiflumetofen, Pyroxasulfone, S-Metolachlor, Sedaxane, Simazine, Sodium Salt of Dicamba, Sodium Salt of Fomesafen (Fomesafen), Spinosada mixture of Spinosad A and Spinosad D, Sulfentrazone, Tefluthrin, Thiabendazole, Thiamethoxam, Triasulfuron, Trifloxysulfuron-

sodium, and Trinexapac-ethyl, Zinc (Zn). Syngenta further admits that it currently sells pesticides containing the co-formulants copper OH and benoxacor.

REQUEST FOR ADMISSION NO. 190:

Admit that the following active ingredients do not cause Parkinson's disease: Abamectin, Acibenzolar-S-methyl, Pydiflumetofen, Ametryn, Atrazine, Azoxystrobin, benoxacor, Benzovindiflupyr, Bicyclopyrone, Bromoxynil Octanoate, ChlorantraniIiprole, Chlorothalonil, Clodinafop-ropargyl, Cloransulam-methyl, copper OH, Cyantraniliprole, Cyproconazole, Cyprodinil, Cyromazine, Dicamba, Difenoconazole, Difenoconazole + Fludioxonil, Diquat dibromide, Emamectin benzoate, Fenoxaprop-P-ethyl, Florasulam, Fluazifop-P-butyl, Fluazinam, Fludioxonil, Flumetralin, Fluroxypyr 1-methylheptyl ester, Fluxofenim, Fomesafen, Glyphosate, Lambda-cyhalothrin, Mancozeb, Mandipropamid, MCPA, Mefenoxam, Mesotrione, Metribuzin, Oxathiapiprolin, Pasteuria nishizawae-Pn1, Picarbutrazox, Pinoxaden, Primisulfuron-methyl, Prometryn, Propiconazole, Prosulfuron, Pydiflumetofen, Pyroxasulfone, S-Metolachlor, Sedaxane, Simazine, Sodium Salt of Dicamba, Sodium Salt of Fomesafen, Spinosad A, Spinosad D, Sulfentrazone, Tefluthrin, THIABENDAZ, Thiabendazole, Thiamethoxam, Triasulfuron, Trifloxysulfuron-sodium, and Trinexapac-ethyl, Zinc (Zn).

RESPONSE TO REQUEST FOR ADMISSION NO. 190:

Syngenta objects to this Request as vague and ambiguous. Syngenta also objects on the grounds of relevance; the compound at issue in this case is paraquat, and other unrelated chemicals are irrelevant. Syngenta further objects that this Request is overbroad and unduly burdensome because it is not limited by geographic scope and thus includes pesticides sold in states and countries not at issue in this case. Insofar as Syngenta sells products containing the referenced chemicals, *see* Response to Request for Admission No. 189, Syngenta admits that none of the products that it sells cause Parkinson's disease.

REQUEST FOR ADMISSION NO. 191:

Admit that the products listed on exhibit 1, which is a printout from Syngenta's website https://www.syngenta-us.com/crop-protection/all-products, are sold or have been sold by Syngenta.

RESPONSE TO REQUEST FOR ADMISSION NO. 191:

Syngenta objects on the grounds of relevance to the extent that this Request concerns products other than paraquat. Syngenta denies that Exhibit 1 accurately represents the Syngenta-us.com website as a visitor would have seen it. Notwithstanding that, Syngenta admits that all the products at the link provided in this Request are products that are sold or have been sold by Syngenta in certain markets.

REQUEST FOR ADMISSION NO. 192:

Admit that none of the labels for the products listed on Exhibit 1, which is a printout from Syngenta's website https://www.syngenta-us.com/crop-protection/all-products, include a warning for Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 192:

Syngenta objects on the grounds of relevance to the extent that this Request concerns products other than paraquat. Syngenta further objects that this Request is misleading, insofar as it suggests that product labels should include a warning for Parkinson's disease where the scientific consensus does not support a causal relationship between any of these products and Parkinson's disease. Syngenta further objects to this Request as misleading, given that the EPA has determined that there is "insufficient epidemiological evidence of a clear associative or causal relationship" between paraquat exposure and the development of Parkinson's Disease. Syngenta denies that such a warning would be appropriate. Subject to and without waiving its objections, Syngenta admits that the products listed at the cited web page do not include labels with warnings for Parkinson's disease.

REQUEST FOR ADMISSION NO. 193:

Admit that, as of January 16, 2024, Syngenta was maintaining the registration of 833 different pesticide products approved for sale in the United States. SYNG-PQ-PA-00032122

RESPONSE TO REQUEST FOR ADMISSION NO. 193:

Syngenta admits that on January 16, 2024, it submitted the cited document which references Syngenta paying fees to support 833 registrations. Syngenta further states that the document speaks for itself.

REQUEST FOR ADMISSION NO. 194:

Admit that none of the labels for the 833 different pesticide products listed on Exhibit 2 (SYNG-PQ-PA-00032122) registered by Syngenta, and approved for sale in the United States, include a warning for Parkinson's disease.

RESPONSE TO REQUEST FOR ADMISSION NO. 194:

Syngenta objects on the grounds of relevance to the extent that this Request concerns products other than paraquat. Syngenta further objects to this Request as misleading, given that the EPA has determined that there is "insufficient epidemiological evidence of a clear associative or causal relationship" between paraquat exposure and the development of Parkinson's Disease. Syngenta further objects that this Request is misleading insofar as it suggests that product labels should include a warning for Parkinson's disease without scientific consensus that would support a causal relationship between any of the products and Parkinson's disease. Syngenta denies that such a warning would be appropriate. Subject to and without waiving its objections, Syngenta admits that it has never submitted a request to the EPA to include a warning related to Parkinson's disease on any label.

REQUEST FOR ADMISSION NO. 195:

Admit that on August 2, 2019, an employee at the EPA informed Syngenta that it would be downplaying the potential risk of Paraquat to say that inhalation of Paraquat is unlikely. (See SYNG-PQ-MDL-000979557).

RESPONSE TO REQUEST FOR ADMISSION NO. 195:

Syngenta objects to this Request as incomplete. Subject to and without waiving its objections, Syngenta admits that it received an email from an employee at the EPA on August 2, 2019. Syngenta further admits that the EPA emailed Syngenta with the subject line "EPA suggested improvements to Paraquat Training Program." In that email, an EPA employee stated, "At the beginning of the summer we discussed a few issues with the paraquat training that have been brought to our attention since it has gone live. The email is to follow up on that conversation and identify issues which the agency feels need to be addressed. . . . Thanks for your continued cooperation with the paraquat human health mitigation." The email included the following bullet: "Routes of exposure slide -- Inhalation is said to be unlikely . . . due to vapor pressure and droplet size. EPA asked registrants to remove this statement when we were having label language discussions because it sounds it's downplaying the potential risk, so it shouldn't have been added to the training." Except as admitted herein, denied.

REQUEST FOR ADMISSION NO. 196:

Admit that the document produced in discovery bates number SYNG-PQ-13102284-SYNG-PQ-13102406 is a true and accurate copy of a notebook of data and memoranda maintained by Syngenta scientists Dr. Ted Lock in the course of regularly conducted business activity and it was the regular practice of Dr. Lock to make such memorandum, report, record, or data compilation.

RESPONSE TO REQUEST FOR ADMISSION NO. 196:

Syngenta admits that the document produced in discovery Bates number SYNG-PQ-13102284–SYNG-PQ-13102406 is a true and accurate copy of a notebook containing copies of external studies and notes from Syngenta scientist Dr. Ted Lock. Syngenta denies that this notebook was maintained by Dr. Ted Lock in the course of regularly conducted business activity.

By way of further response, Syngenta states that Dr. Lock's notebook summarizes both external and internal studies and their findings, which speak for themselves.

REQUEST FOR ADMISSION NO. 197:

Admit that on August 3, 2000, Dr. Ted Lock, a scientist employed by Syngenta stated "the Parkinson link will not diminish, we are stuck with it.!" (See SYNG-PQ-13102284, p. 69).

RESPONSE TO REQUEST FOR ADMISSION NO. 197:

Syngenta objects to this Request because it cherry-picks a single phrase from an isolated document and does not provide any context for it. Subject to and without waiving its objections, Syngenta states that on August 3, 2000, Dr. Ted Lock, a scientist employed by Syngenta, reviewed a 1998 Corasaniti study titled "Paraquat: a useful tool for the in vivo study of mechanisms of neuronal cell death." Dr. Lock stated "[o]verall, not a lot of new findings of concern, but it raises the profile of the neurotoxic effects of paraquat, as seen at *high doses* and *non relevant routes of exposure.*" SYNG-PQ-1302284 at pg. 69 (emphasis added). Syngenta admits that Dr. Lock concluded his analysis with the statement "the Parkinson link will not diminish, we are stuck with it.!" Except as specifically admitted here, denied.

REQUEST FOR ADMISSION NO. 198:

Admit that the document produced in discovery bates numbered SYNG-PQ-23457731 is a true and correct copy of a Letter from Mr. J.C. Gage to Dr. F.F. Snowdon, dated October 13, 1958; created and maintained in the course of regularly conducted business activity; and it was the regular practice of Syngenta to create and maintain such correspondence reporting data from Paraquat studies.

RESPONSE TO REQUEST FOR ADMISSION NO. 198:

Syngenta admits that the document produced with Bates number SYNG-PQ-23457731 is a true and correct copy of a Letter from Mr. J.C. Gage to Dr. F.F. Snowdon, dated October 13, 1958. Syngenta denies that this was created in the course of regularly conducted business activity.

REQUEST FOR ADMISSION NO. 199:

Admit that on October 13, 1958, a Syngenta employee, Mr. J.C. Gage wrote to Dr. F.F. Snowdon reporting that "Dipyridyl appears to have a moderate toxicity mainly by affecting the central nervous system, and it can be absorbed through the skin." (See SYNG-PQ-23457731).

RESPONSE TO REQUEST FOR ADMISSION NO. 199:

Syngenta objects to this Request as incomplete and seeking irrelevant information. The "Dipyridyl" referenced in the cited document is not paraquat, and it has chemical properties that are substantially different than paraquat. Subject to its objections, Syngenta admits that the document contains the excerpted quoted language and otherwise speaks for itself.

REQUEST FOR ADMISSION NO. 200:

Admit that the document produced in discovery bates numbered SYNG-PQ-23457731 is a true and correct copy of a Letter from Mr. J.C. Gage to Dr. F.F. Snowdon, dated October 13, 1958 created and maintained in the course of regularly conducted business activity and it was the regular practice of Syngenta to create and maintain such correspondence reporting data from Paraquat studies.

RESPONSE TO REQUEST FOR ADMISSION NO. 200:

Syngenta admits that the document produced with Bates number SYNG-PQ-23457731 is a true and correct copy of a Letter from Mr. J.C. Gage to Dr. F.F. Snowdon, dated October 13, 1958. Syngenta denies that this was created in the course of regularly conducted business activity.

REQUEST FOR ADMISSION NO. 201:

Admit that the document produced in discovery bates numbered SYNG-PQ-01845525-SYNG-PQ-01845630 is a true and correct copy of a collection of memoranda created by Chevron and provided to Syngenta in the course of regularly conducted business activity and if it was the regular practice of Chevron to create and provide such memoranda regarding Paraquat to Syngenta.

RESPONSE TO REQUEST FOR ADMISSION NO. 201:

Syngenta admits that SYNG-PQ-01845525–SYNG-PQ-01845630 is a true and correct copy of a collection of memoranda collected by Chevron and provided to Syngenta. Syngenta

denies knowledge about what Chevron's regularly conducted business activities entailed. Chevron is a separate entity and Syngenta cannot speak for its business activities.

REQUEST FOR ADMISSION NO. 202:

Admit that on March 6, 2008 a litigation hold was implemented by Syngenta "concerning retention of documents and emails relevant to potential future litigation involving claims that paraquat herbicide may be associated with the onset of Parkinson's Disease."

RESPONSE TO REQUEST FOR ADMISSION NO. 202:

Plaintiffs appear to be quoting from a copy of the litigation hold itself, which was produced to Plaintiffs pursuant to Federal Rule of Evidence 502(d). Syngenta specifically objects to the use of Rule 502(d) materials at trial or hearing in this matter on the grounds of privilege and relevance. Subject to and without waiving its objections, Syngenta admits that a litigation hold was issued on March 6, 2008.

REQUEST FOR ADMISSION NO. 203:

Admit that Paraquat may bind to glass surfaces and that therefore the analysis of the amount of paraquat in urine and blood samples will generate artificially low results if the samples are stored in glass tubes.

RESPONSE TO REQUEST FOR ADMISSION NO. 203:

Syngenta objects to this Request as vague and ambiguous with respect to the undefined phrases "may bind" and "artificially low results." Syngenta further objects to this Request to the extent that it is more properly the subject of expert testimony. Syngenta further objects to this Request to the extent that it asks Syngenta to generalize about the scientific conclusion that "samples will generate artificially low results" without reference to any specific study, including whether the glass was treated prior to the study to prevent absorption. Syngenta states that it is willing to meet and confer regarding Plaintiff's position regarding the necessity of this Request for Admission from Syngenta, rather than seeking this information from expert testimony.

REQUEST FOR ADMISSION NO. 204:

Admit that Paraquat was banned in Brazil based on a 2016 technical evaluation conducted by Scientists in Brazilian's Regulatory Agency, Anvisa, that concluded that Paraquat was mutagenic and that Paraquat can cause Parkinson's disease in humans.

RESPONSE TO REQUEST FOR ADMISSION NO. 204:

Subject to its Objections, Syngenta states that Brazil began phasing out the use of paraquat products in September 2020, though farmers were permitted to use existing supplies through 2021. Syngenta admits that Brazil's decision to phase out paraquat products was based on a 2016 technical evaluation that recommended ending paraquat sales due to concerns about potential mutagenic and neurotoxic impacts, paraquat's acute toxicity, and the lack of an antidote for paraquat poisoning. Brazil is the only country in the world that purports to have conducted a scientific evaluation of whether paraquat has mutagenic or neurotoxic potential and to have concluded that it does. Other countries' regulators that examined potential neurotoxic impacts during the same time period as Brazil, such as Australia, or after Brazil's evaluation, such as the U.S. EPA, have concluded that the scientific evidence does not support a causal link between paraquat exposure and neurotoxic impacts.

REQUEST FOR ADMISSION NO. 205:

Admit that on July 11, 2007 the Court Of First Instance Of The European Communities voided the registration of Paraquat in the European Union, in part because Syngenta chose not to provide the European Commission "any data concerning the neurotoxicity of paraquat nor any reason why there was no need to provide information on this."

RESPONSE TO REQUEST FOR ADMISSION NO. 205:

Syngenta objects to this Request to the extent that it purports to characterize the reasoning behind a lengthy decision by selectively quoting a portion of a single sentence. Syngenta further objects to the selective quotation as improperly quoting the Court's ruling, which uses different language, specifically: "Moreover, it can be seen from the Draft Report that the notifier provided

the rapporteur with no data concerning the neurotoxicity of paraquat, without giving any reason why information on that point was not necessary." Syngenta admits that the opinion of the Court of First Instance contains that language. Syngenta further states that, in 2007, a European Union judicial body issued a decision that annulled the existing EU paraquat registration. The reviewing court determined that the file for the initial registration was mishandled by the regulatory Commission and that it failed to consider all available evidence. The EU judicial body did not purport to conduct a regulatory review of paraquat safety or risk assessment based on a comprehensive review of the available scientific data. Certain non-EU countries also followed the EU's lead and terminated paraquat sales in order to align with the EU standards. The EU member countries impacted by this decision and other countries that aligned with the EU are as follows (though some of these countries made decisions about paraquat before or after the 2007 EU judicial ruling): Albania; Austria; Belgium; Bosnia & Herzegovina; Bulgaria; Croatia; Cyprus; Czech Republic; Denmark; Estonia; Finland; France; Germany; Greece; Hungary; Ireland; Italy; Latvia; Lithuania; Luxembourg; Macedonia; Malta; Montenegro; Netherlands; Poland; Portugal; Romania; Serbia; Slovakia; Slovenia; Spain; Sweden; Turkey; and United Kingdom. To the extent not specifically admitted herein, denied.

REQUEST FOR ADMISSION NO. 206:

Admit that Syngenta chose not to appeal the July 11, 2007 ruling of the Court Of First Instance Of The European Communities.

RESPONSE TO REQUEST FOR ADMISSION NO. 206:

Syngenta objects to this Request to the extent that it purports to characterize the appeals process for rulings of the Court of First Instance of the European Communities. Subject to and without waiving its objections, Syngenta admits that it did not appeal the July 11, 2007 ruling of

the Court of First Instance of the European Communities. By way of further response, Syngenta incorporates its response to Request for Admission No. 205.

REQUEST FOR ADMISSION NO. 207:

Admit that if Syngenta applied to re-register Paraquat in the European Union then it would have had to provide the European Commission on data concerning the neurotoxicity of paraquat.

RESPONSE TO REQUEST FOR ADMISSION NO. 207:

Syngenta objects to this Request as vague and ambiguous as to the undefined word "neurotoxicity." Syngenta further objects to this Request to the extent that it calls for speculation, insofar as it asks Syngenta to admit to something that never happened. Syngenta further objects to this Request to the extent that it calls for legal conclusion. Subject to and without waiving its objections, Syngenta states that it cannot admit or deny this Request because it asks Syngenta to speculate regarding a re-registration process that never occurred. By way of further response, Syngenta states that it has continually, and would have continued to, provide necessary data to regulatory authorities under controlling regulatory regimes.

REQUEST FOR ADMISSION NO. 208:

Admit that Syngenta chose not to apply to re-register Paraquat in the European Union.

RESPONSE TO REQUEST FOR ADMISSION NO. 208:

Syngenta objects to this Request as vague and ambiguous. Subject to and without waiving its objections, Syngenta admits that it did not re-register paraquat in the European Union.

GENERAL OBJECTIONS

1. Syngenta objects to these Requests as overbroad, unnecessarily duplicative, and not proportional to the needs of discovery in the case. Plaintiffs served over 200 Requests for Admission on Syngenta at the end of the discovery period, seeking detailed information regarding dozens of specific studies and hundreds of specific facts. Given the breadth of Plaintiffs' Requests, Syngenta is continuing to investigate and reserves the right to supplement its Responses if it identifies further responsive information.

2. Syngenta objects to these Requests to the extent that they seek information protected by the attorney-client privilege, work product doctrine, or any other applicable law, privilege, doctrine, or immunity. Any disclosure of information shall not be deemed, nor shall it constitute, a waiver of any such privilege or of any other ground for objecting to the discovery or admissibility of such material, its subject matter, or the information contained therein, nor shall such disclosure constitute a waiver of Syngenta's rights to object to the use of such information during this or any other proceeding.

3. Syngenta objects to these Requests to the extent that they purport to require Syngenta to assemble or produce information that is not already in existence and reasonably available in the form requested by Plaintiffs.

4. Syngenta's Responses reflect only the current state of Syngenta's knowledge and information regarding the information that Plaintiffs have requested. Further investigation may identify additional facts or information that could lead to additions to, changes in, or variations from, the Responses herein. Syngenta expressly reserves the right to supplement, amend, correct, clarify, or modify its Responses to the Requests as further information becomes available.

5. Syngenta objects to these Requests to the extent that they seek information or documentation that is equally available to Plaintiffs.

Dated: January 24, 2025

Respectfully submitted,

/s/ Grace Brier

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Counsel for Defendants Syngenta Crop Protection, LLC and Syngenta AG

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served by means of electronic mail to all counsel registered for service in this action on January 24, 2025.

By: */s/ Grace C. Brier*
Grace C. Brier
Counsel for Defendants,
Syngenta Crop Protection LLC and
Syngenta AG