PARAQUAT/GRAMOXONE PRODUCTS CLASS ACTION
https://www.siskinds.com/class-action/paraquat/

Please read this notice carefully, as the class action may affect your rights.

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BASIC INFORMATION

1. Why is there a notice?

This lawsuit has been certified as a class action, which means that the court has approved for this lawsuit to move forward as a class action lawsuit (see section below on "What is a class action").

If you are part of the Class, you have certain rights and choices before the Court decides whether the claims made against the Defendants (on behalf of the Class) are valid. This notice explains the process and exists to help you understand your options.

This notice applies to all individuals in Canada who meet the Class Definition (see section "Who is a member of the Class?").

The Superior Court of Québec has already authorized a parallel class action to proceed on behalf of certain individuals in that province. Further information on the litigation in Quebec is available at https://www.siskinds.com/class-action/paraquat/. This notice pertains only to the action before the Supreme Court of British Columbia.

2. What is this lawsuit about?

This case is known as *Van Wijngaarden v. Syngenta Canada Inc*. It is being heard by the Supreme Court of British Columbia and bears the action number S217598 in the Vancouver Registry. The people who started this lawsuit are called the Plaintiffs. The corporations being sued are called the Defendants and they are: Syngenta Canada Inc., Syngenta Crop Protection AG, Syngenta AG, and Syngenta Crop Protection LLC.

This class action lawsuit alleges that the 'Gramoxone Products'—that is, paraquat-containing herbicides made, marketed, sold, or distributed by the Defendants—cause or contribute to Parkinson's disease, and that the Defendants designed and sold paraquat-containing products without properly warning users of this alleged risk. The specific paraquat-containing products implicated in this class action lawsuit were under the following labels:

Gramoxone Product	Reg. No.
Gramoxone Liquid Herbicide with Wetting Agent	8661
Gramoxone PDQ Liquid non-selective herbicide	25448
Sweep No-Till Herbicide	15843
Gramoxone 200 SL	33125
Paraquat Technical	21247
Paraquat Dichloride Manufacturing Concentrate	21273

The lawsuit seeks compensation for people in Canada, outside of Quebec, who have been diagnosed with Parkinson's disease and who were exposed to Gramoxone Products. Information regarding a separate lawsuit

brought on behalf of individuals in Quebec is available here: https://www.siskinds.com/class-action/gramoxoneparaquat/?lang=fr

The class action seeks damages and declarations related to claims for alleged negligence (including negligent design and failure to warn). Among other things, the class action seeks:

(1) damages, including punitive damages;

(2) a declaration that the Defendants breached their duty of care to the Class Members;

(3) a declaration that the Defendants were negligent in the research, development, design, manufacture, testing, distribution, sale and marketing of Gramoxone Products;

(4) a declaration that the Defendants were negligent in their failure to warn Gramoxone users and the public of the health risks associated with exposure to Gramoxone Products;

(5) a declaration that the Defendants are vicariously liable for the acts and omissions of their officers, directors, agents, employees, and representatives;

(6) damages pursuant to the *Family Compensation Act*, RSBC 1996, c 126, and similar legislation and common law in other provinces, where applicable;

(7) recovery of health care costs incurred by the Ministry of Health Services on their behalf pursuant to the Health Care Cost Recovery Act, and comparable legislation in other provinces and territories;

(8) the costs of distributing all monies received to class members; and

(9) interest pursuant to the *Court Order Interest Act,* RSBC 1996, c 79.

The certified common issues in this lawsuit are:

(1) Can exposure to Gramoxone Products cause or contribute to Parkinson's disease?

(2) If the answer to question (1) is 'yes':

Duty to Warn

a. when did the Defendants know, or when ought the Defendants have known, of this causal relationship or association?

b. did the Defendants have a duty to warn the Class Members of the risks of Parkinson's disease associated with Gramoxone Products?

c. did the Defendants breach their duty to warn the Class Members of risk described in (1) associated with Gramoxone Products?

d. if the answer to question 2(c) is yes, when did the breach of duty occur?

Negligent Design

e. were the Defendants negligent in failing to conduct reasonable research, investigation and testing of Gramoxone Products in relation to the risk described in (1)?

f. does the risk described in (1) make Gramoxone Products make them unfit for their intended use?

g. if the answer to 2(f) is yes, does this constitute a design defect?

h. do the Defendants owe a duty of care to the Class Members with respect to the research, investigation, and testing of Gramoxone Products?

i. did the Defendants breach the standard of care with respect to the design, development and/or testing of the Gramoxone Products?

(3) Are the Defendants vicariously liable for the acts and omissions of their officers, director, agents, employees, and representatives?

(4) If the answers to any of the above questions are "yes", would the Defendants' conduct justify an award of punitive or exemplary damages?

The Defendants vigorously deny that their paraquat-containing herbicides cause Parkinson's disease. The Court has not decided whether the Plaintiffs or the Defendants are right. The lawyers for the Plaintiffs will have to prove the claims in Court.

3. What is a Class Action?

In a class action, one or more people called "representative plaintiffs" sue on behalf of people who have similar claims. All of these people with similar claims are called the "class" or "class members." The court resolves the issues for all class members, except for those who remove themselves from the class.

The representative plaintiffs in this case are Johannes Van Wijngaarden and the Estate of Wayne Gionet.

The common issues trial will take place before the Supreme Court of British Columbia. Class members may participate in the proceeding in accordance with the law and will not be held liable for legal costs if the case is unsuccessful on the merits.

4. Who is a Member of the Class?

You are automatically included in this lawsuit if you meet the Class Definition. The Class Definition is people in Canada who:

(a) have been diagnosed with Parkinson's disease after using (i.e. applying, mixing, loading, and/or flagging) Gramoxone Products during any time after July 1, 1963 (the "Class Members"); or

(b) are the living spouse, child, grandchild, parent, grandparent or sibling of a Class Member.

5. What is the Plaintiff asking for?

The Plaintiffs are asking for monetary compensation known as damages for harms suffered by the Plaintiffs and the Class, as well as ancillary relief and declarations.

6. Is there any money available right now?

No money or benefits are available now because the Court has not yet decided whether the Defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or any other benefits

will ever be obtained. If they are, notice will be sent out to notify Class Members about how they can make a claim.

YOUR OPTIONS

7. How do I include myself in the lawsuit?

You are automatically included in the lawsuit if you meet the Class Definition (see section above on "Who is a member of the Class?").

8. How do I exclude myself from the lawsuit?

If you decide not to participate in this lawsuit, you must remove yourself. This is referred to as "opting out." If you remove yourself:

(1) you will NOT receive any money or benefit that may be obtained as a result of this lawsuit;

(2) you will not be bound by any Court orders; AND

(3) you keep your right to sue the Defendants regarding the issues in this case.

You cannot change your mind later and opt back into the class action. To remove yourself, you must send a written request that says you want to be removed from the Paraquat/Parkinson's Disease Class Action. Your letter must include your name, address, telephone number, email address, and signature.

The written request must be received by Class Counsel, postmarked by no later than January 6, 2027, by physical mail or email to the following address:

Donna McEvoy, Siskinds LLP
65 Queen St. W., Suite 400
Toronto, Ontario M5H 2M5
416-594-4793
donna.mcevoy@siskinds.com

If you have any questions about how to remove yourself from the Class, you may contact Class Counsel at the above contact information.

THE LAWYERS REPRESENTING YOU

9. Do I have a lawyer in this case?

Yes. The Court has appointed Siskinds LLP to represent you and the other Class Members as "Class Counsel."

If you want to be represented by another lawyer, you must opt out and hire one to represent you for your own individual action at your own expense.

10. How will the lawyers be paid?

Class Counsel will only be paid if the action is successful. If it is successful, they will request that the Court permit them to deduct their fees from the proceeds of the action. If the Court grants their request, the fees and expenses would be deducted from any money obtained for the Class.

11. How and when will the Court decide who is right?

If the case is not settled, the Plaintiffs will have to prove their claims and the claims of the Class at a trial. During the trial, a court will hear all the evidence, so that a decision can be reached about whether the Plaintiffs or the Defendants are right about the claims in the lawsuit. There is no guarantee that the Plaintiffs will win any money or benefits for the Class.

12. Will I get money after the trial?

If the Plaintiffs succeed at obtaining money or benefits as a result of a trial or settlement, notice will be sent out to inform Class Members about how to make claims and/or their options at that time.

GETTING MORE INFORMATION

13. How do I get more information?

You can get more information about this case on the website https://www.siskinds.com/class-action/paraquat/ or by contacting Class Counsel:

Donna McEvoy, Siskinds LLP
65 Queen St. W., Suite 400
Toronto, Ontario M5H 2M5
416-594-4793
donna.mcevoy@siskinds.com

You may also review the court file at the Vancouver Registry of the Supreme Court of British Columbia, Action No. S217598.

PLEASE DO NOT CONTACT THE COURT OR THE DEFENDANTS' LAWYERS WITH QUESTIONS ABOUT THE CLASS ACTION.

THIS NOTICE HAS BEEN AUTHORIZED BY THE SUPREME COURT OF BRITISH COLUMBIA