

EXHIBIT A

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IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. _____

WALTER PARKER and
LINDA PARKER,

Plaintiffs,

vs.

SYNGENTA CROP PROTECTION LLC,
CHEVRON U.S.A., INC.,
and UNITED STATES SUGAR CORPORATION

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

1. This is an action seeking damages in excess of Thirty Thousand Dollars (\$30,000.00) exclusive of fees and costs.
2. Plaintiffs WALTER PARKER and LINDA PARKER are citizens of the State of Florida and citizens of the United States of America. WALTER PARKER was diagnosed as having Parkinson's Disease, on or about May 2018.¹
3. Defendants are as follows:
 - a. Defendant SYNGENTA CROP PROTECTION LLC is a Delaware company with its principal place of business in Greensboro, North Carolina. Its registered agent for service of process is CT Corporation System, 1200 South Pine Island Road, Plantation, Florida 33324.

¹ Plaintiffs had no reason to believe there was any link between paraquat exposure and Walter Parker's Parkinson's disease until no earlier than 2021.

b. Defendant CHEVRON U.S.A., INC. (“Chevron USA”) is a Pennsylvania corporation with its principal place of business in San Ramon in Contra Costa County, California. Its registered agent for service of process is The Prentice-Hall Corporation System, Inc., 1201 Hays Street, Tallahassee, Florida 32301.

c. Defendant UNITED STATES SUGAR CORPORATION (“U.S. Sugar”) is a Delaware corporation with its principal place of business in Florida and may be served through its registered agent Luke Kurtz, 111 Ponce de Leon Avenue, Clewiston, Florida 33440.

4. The Defendants are corporations who are amenable to jurisdiction in the Courts of Florida because they are either Florida corporations or foreign corporations that now conduct or have conducted business or business ventures, or have had offices or agencies within Florida, which subjects them to jurisdiction within Florida. The alleged causes of action arise out of, or are incidental, to the business or business ventures conducted within Florida by each of the Defendants or through which the Defendants purposefully directed themselves at Florida or otherwise could reasonably have foreseen that their activities would subject them to jurisdiction of the Florida courts. Each foreign corporation has through brokers, jobbers, wholesalers, or distributors sold, consigned, or leased tangible or intangible personal property to persons in this state. Each foreign corporation has committed wrongful acts either outside or inside this state causing injury to Plaintiff WALTER PARKER. Each foreign corporation derives substantial revenue from interstate or international commerce and should reasonably have expected their acts to have consequences in this state or any other state. Each foreign corporation has conducted substantial and not isolated activity within Florida. Furthermore, pursuant to Florida

Statute 47.011 and 47.051, venue of this matter is proper in Palm Beach County because Defendant U.S. Sugar is a domestic corporation that resides in Palm Beach County.

5. Each Defendant designed, manufactured, supplied, sold and/or distributed products containing paraquat (“Paraquat-Containing Products”).

6. Plaintiffs allege that the Defendants have, at all times material to these causes of action, and through and including the present, maintained sufficient contact with the State of Florida and/or transacted substantial revenue producing business in the State of Florida to subject them to the jurisdiction of this Court pursuant to Florida Statute 48.181 and/or 48.182 and/or 48.193 and/or 47.16.

BACKGROUND

7. Plaintiff WALTER PARKER (“Plaintiff” or “WALTER PARKER”) was born on July 21, 1946.

8. Plaintiff WALTER PARKER worked with and was exposed to products containing paraquat that were designed, manufactured, supplied, sold and/or distributed by the Defendants, or their predecessors.

9. Plaintiff WALTER PARKER was exposed to, breathed, ingested and/or absorbed paraquat when he worked with and around Defendants’ Paraquat-Containing Products.

10. Plaintiff WALTER PARKER, and those around him, used Defendants’ Paraquat-Containing Products in the intended manner and without significant change in the Paraquat-Containing Products’ condition. Plaintiff WALTER PARKER relied upon the Defendants to instruct him and those working around him regarding the proper methods or handling the products, being unaware of the dangerous properties of paraquat.

11. More specifically, Plaintiff WALTER PARKER was exposed to Defendants' Paraquat-Containing Products in the course of his employment with Defendant U.S. Sugar from 1967 to 1978 and 1980 to 2001.

12. Plaintiff WALTER PARKER would inhale, breathe, ingest and/or absorb paraquat from Defendants' Paraquat-Containing Products, including but not limited to Gramoxone, while mixing said products and "flagging" for helicopters and other aircraft spraying sugar fields owned and/or operated by U.S. Sugar.

13. Those Paraquat-Containing Products to which Plaintiff was exposed during his employment with U.S. Sugar were purchased at area retailers including Chemspray in Pahokee, Florida and Helena Chemicals in Belle Glade, Florida.

14. Plaintiff WALTER PARKER would also inhale, breathe, ingest and/or absorb paraquat from Defendants' Paraquat-Containing Products at his residence in Clewiston, Florida while he was "edging" his lawn. The Paraquat-Containing Products he used for this purpose were provided by Defendant U.S. Sugar for its employees' home use.

15. Plaintiff's exposure to and inhalation of paraquat from Defendants' Paraquat-Containing Products caused him to develop Parkinson's disease, which he was diagnosed with on or about May 2018.

COUNT I - NEGLIGENCE

16. Plaintiffs incorporate by reference into Count I all other relevant allegations in this complaint.

17. At the time of Plaintiff WALTER PARKER's exposure to Defendants' Paraquat-Containing Products, Defendants knew, or in the exercise of ordinary care should have known, that the use of their Paraquat-Containing Products was hazardous to the health of workers,

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