



# Paraquat

## LITIGATION & CASE CRITERIA UPDATE

### May 2021





# Today's Presenters



**AIMEE WAGSTAFF**  
**Partner**



**TOR HOERMAN**  
**Attorney/Owner**



**JESSIE HOERMAN**  
**Founder**



**NICK D'AQUILLA**  
**VP Growth**



# Paraquat MDL Options

## **JPML hearing on May 27, 2021**

### **Plaintiffs asked for:**

- Northern District of California
- Southern District of Illinois
- Eastern District of Missouri
- Northern District of Mississippi
- Eastern District of Pennsylvania
- District of Minnesota

### **Syngenta/Chevron asked for:**

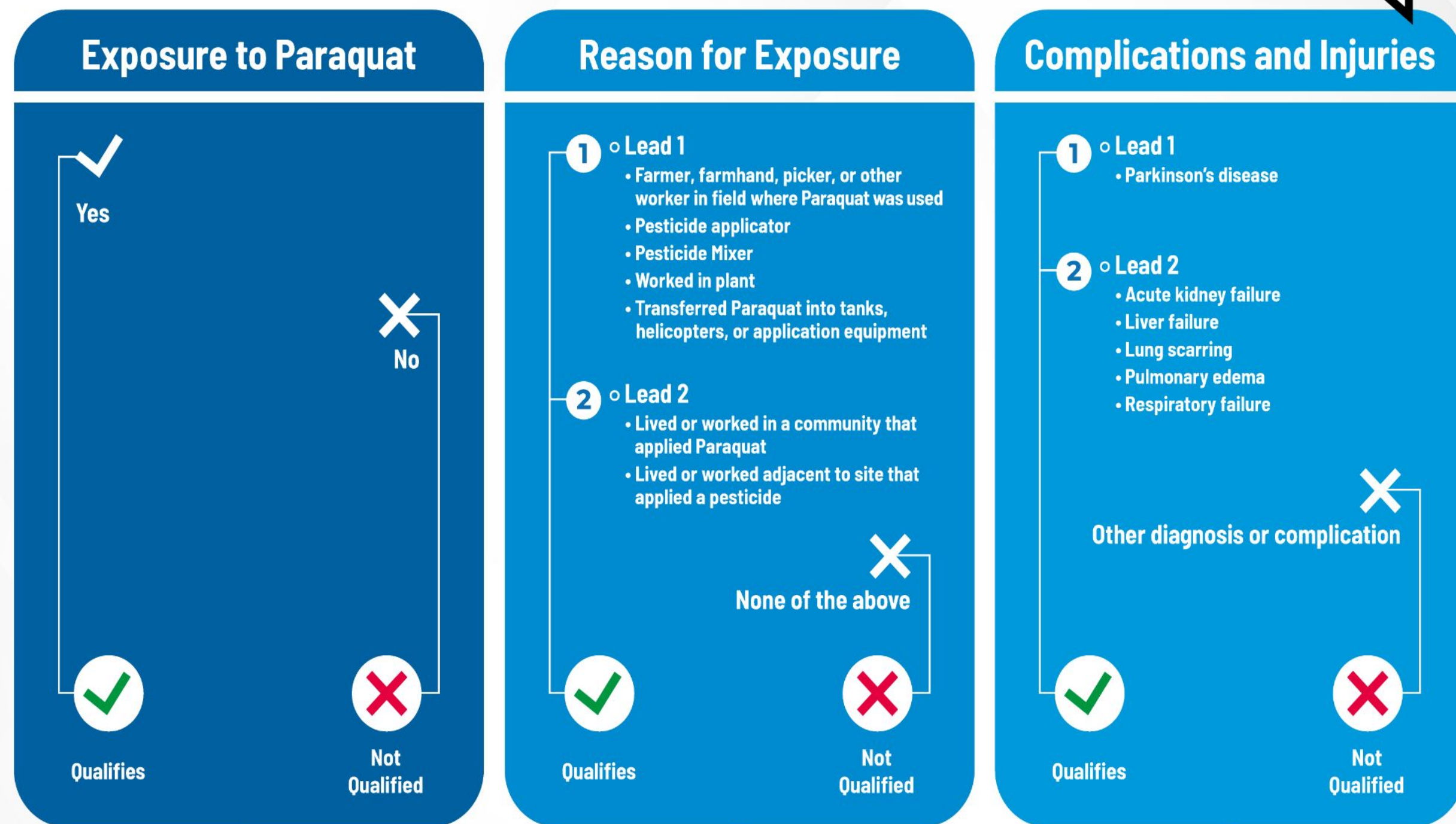
- Northern District of Texas
- Eastern District of Missouri
- District of Minnesota



# February 2019 SimplyConvert Chat Flow

*Early criteria as  
we consider client  
profile*

## Paraquat Flow



✓ "Qualifies" in each of the criteria groupings above results in an automatic contract provided to the client. Dashboard will reflect "Contract Pending" until the client signs contract. Status changes to "Signed" when client signs.

1 Law firm will be notified in real-time of criteria above marked as "lead 1." Lead ranks are divided on the Dashboard.

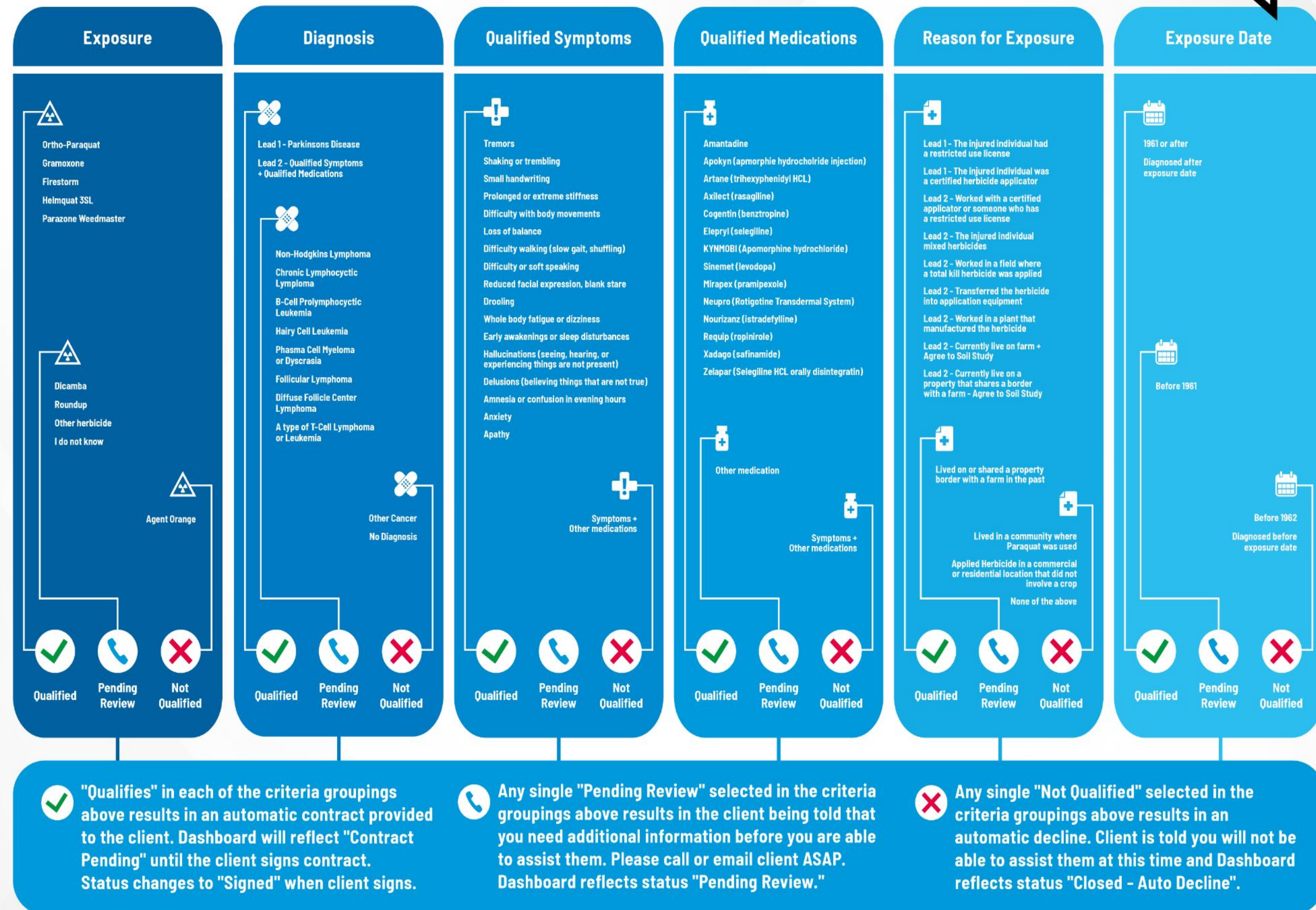
✗ Any single "Not Qualified" selected in the criteria groupings above results in an automatic decline. Client is told you will not be able to assist them at this time and Dashboard reflects status "Closed - Auto Decline".



# May 2021 SimplyConvert Chat Flow

## Two years of data

## Paraquat Flow





# Benefits of getting the first criteria closer

## Benefits to law firms that revise their criteria based on outcomes:

- Decreased staff work
- Decreased case costs
- Better inventory for bellwether selections
- Real-time ability to mine for cross-over litigations or potential changes of criteria

## Big Pictures - Changes made between 2/2019 and 5/2021

### Exposure to “Paraquat” not always known

- Rule out other products (residential use) or no licensed user
- “Brand names” may be known instead
- Paraquat uses - total kill herbicide

### Reason for Exposure/Proving Exposure

- Easiest case - owner of the restricted use license
- How far removed from the restricted use license can we prove?

### Parkinson’s Disease: no definitive diagnostic test

- Symptoms + Medications
- Which symptoms are the strongest indicators?

### Including Cross-Over/Waterfall questions

- Future criteria changes or additional causes of action/defendants we should look for?
- Current litigations we should mine for?

# Data-Driven Decision Making and AI

Analyzing the data of existing client medical records drives criteria changes.

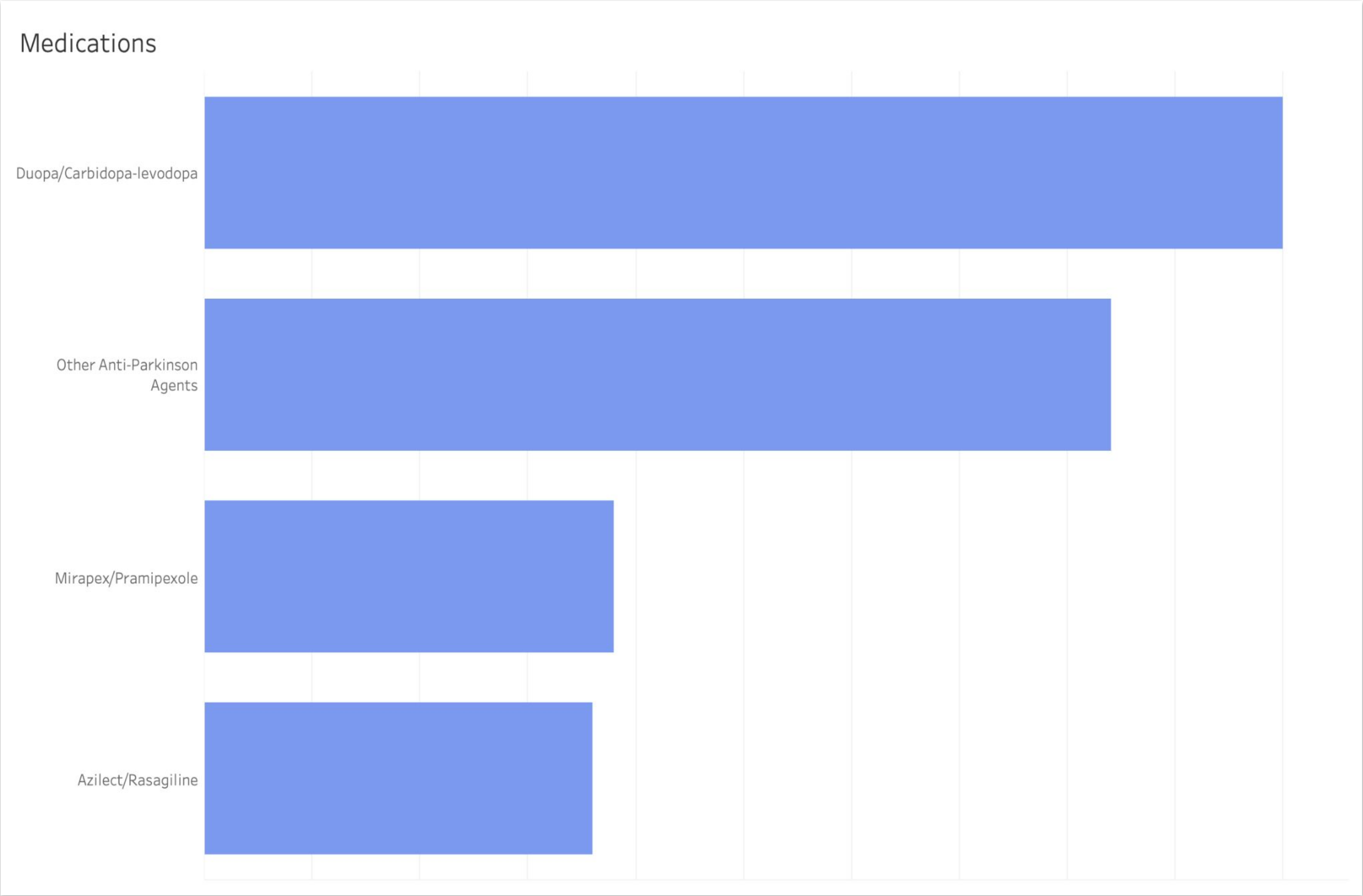
Challenge for lawyers - they must have tools that allow lawyers to do this efficiently and in real-time.

# SimplyConvert and Pattern Data: Working together to build stronger case inventories



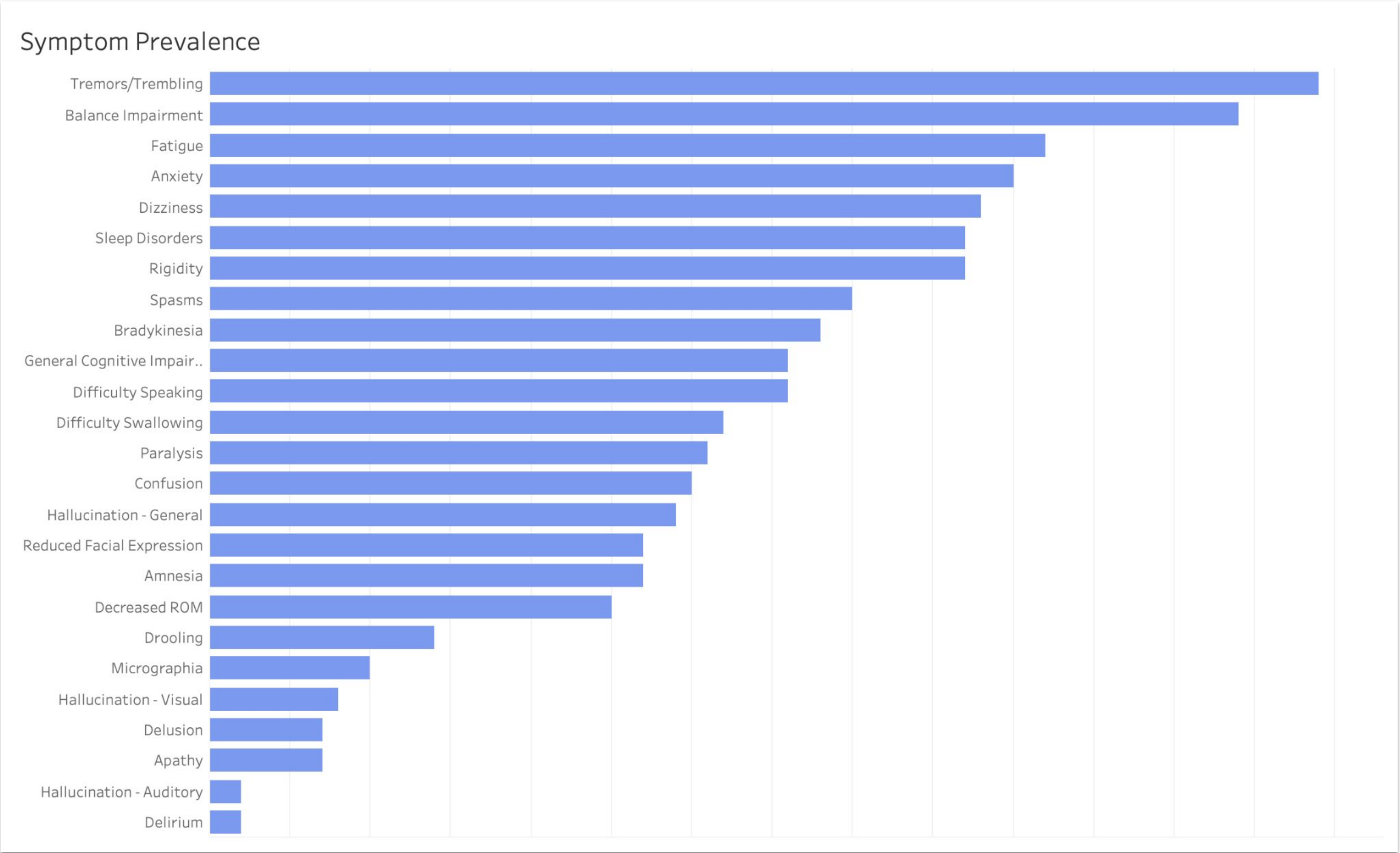


# Indicator Medication Analytics





# Symptom Analytics

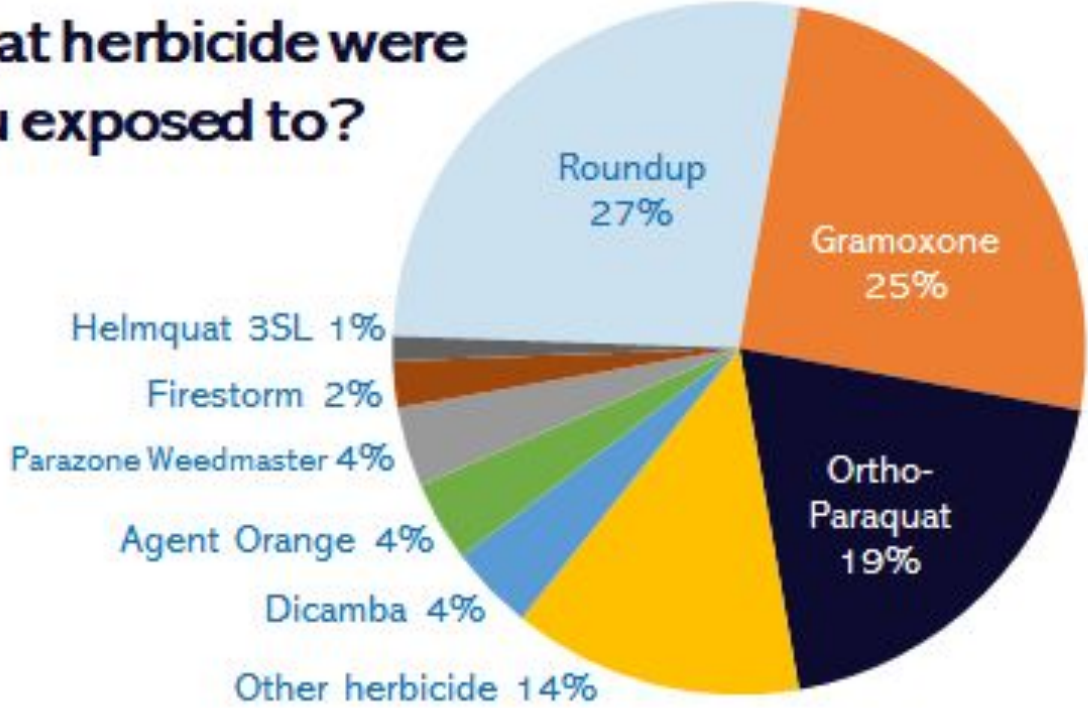




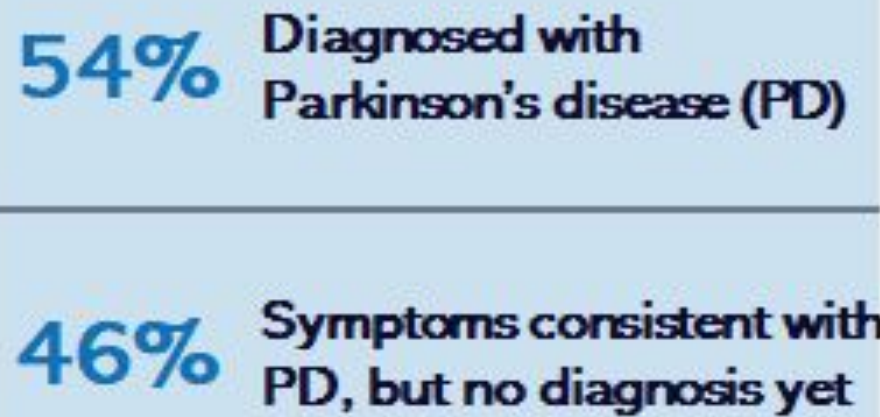
# SimplyConvert Findings



## What herbicide were you exposed to?



## Qualified lead breakdown:



## Medications taken (symptoms only) criteria added 3/11/21

Cogentin	15.50%
Azilect	11.01%
Artane	9.70%
Requip	7.46%
Mirapex	6.27%
Amantadine	5.80%
Apokyn	4.97%
KYNMOBI	4.97%
Neupro	4.14%
Elepryl	3.91%
Sinemet	3.67%
Zelapar	3.43%
Nourizan	1.54%
Xadago	1.18%
Other Medication	16.45%



## Get in Touch

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