

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

IN RE SYNGENTA ACTIONS

This Document Relates To:

Poletti et al. v. Syngenta AG et al.,
No. 3:15-cv-01221-DRH

Judge David R. Herndon

**SUPPLEMENT TO FEE AND EXPENSE APPLICATION OF
HENINGER GARRISON DAVIS, LLC AND ITS CO-COUNSEL**

Heninger Garrison Davis, LLC (“HGD”) by itself and jointly with other law firms (collectively “Team HGD”), submits this Supplement to its Fee and Expense Application (Doc. 349) pursuant to this Court’s Order dated July 18, 2018 (Doc. 352). HGD has attached the requested supplementary spreadsheets for Team HGD as exhibits hereto.

HGD's reported time for common benefit work on behalf of class members is 7,097.50. Doc. 349 at 40. The record evidence describes this work and the lodestar it yields. *Id.* at 10-11, 13, 20-25, 39-40 (including references to exhibits 7-10). Significant projects were assigned to HGD by the MDL PSC, all of which are common benefit work. The hours for that work are included in the 7,097.50 common benefit hours reported by the firm. Additional work by HGD benefitted the overall litigation effort, and those hours meet the description of work performed for the benefit of class members, making it compensable under the Settlement Agreement. Doc. 3507-2. Those hours are included in the 7,097.50 common benefit hours reported by the firm. HGD "reserved the right to seek payment" for this additional work in the unique participation agreement it struck with the MDL PSC. That unique agreement does not limit HGD's common benefit hours

to work expressly directed and approved by the MDL PSC. Each of these points is explained and demonstrated in the pending fee and expense application of the HGD Team. Doc. 349 at 10-13.

Respectfully submitted on August 3, 2018, by:

/s/ W. Lewis Garrison, Jr.

W. Lewis Garrison, Jr.

Coordinated Action Plaintiffs' Liaison Counsel

(Garrison Consolidated Plaintiffs)

Heninger Garrison Davis, LLC

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CERTIFICATE OF SERVICE

I, W. Lewis Garrison, Jr., hereby certify that on this 3rd day of August, 2018, the foregoing was filed via the Court's ECF system, which will serve it via electronic notice on all counsel of record for the Defendants registered to receive it via the ECF system:

/s/ W. Lewis Garrison, Jr.

W. Lewis Garrison, Jr.

Heninger Garrison Davis, LLC

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting		434.4	\$349,460.50			Research and drafting of complaints filed on behalf of over 3,000 plaintiffs in both North Carolina and Illinois.
	Attorneys Contract Attorneys Non-attorneys					
Dispositive motion briefing/argument	Attorneys Contract Attorneys Non-attorneys	473.7	\$338,952.90			
Class certification motion briefing and argument	Attorneys Contract Attorneys Non-attorneys			61.1	\$11,975.60	
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review		954.6	\$554,055.74	395.3	\$229,434.56	Preparation, review, correction of Plaintiff fact sheets.
	Attorneys Contract Attorneys Non-attorneys					
Paper discovery (Syngenta and third parties)		248.7	\$48,745.20	1323.35	\$259,376.60	Preparation, review, correction of Plaintiff fact sheets.
	Attorneys Contract Attorneys Non-attorneys					
Paper discovery against plaintiffs		969.5	\$656,624.50			Includes drafting and serving of discovery reuesets as well as time spent reviewing documents produced by Syngenta and third parties.
	Attorneys Contract Attorneys Non-attorneys			51.5	\$10,094.00	Review of documents produced by Syngenta and third parties.
Discovery motion practice and communications with adverse parties		958.7	\$601,432.20			Includes meeting with clients to gather discovery responses and responsive documents; reviewing responsive documents; drafting discovery responses.
	Attorneys Contract Attorneys Non-attorneys			71.7	\$14,053.20	Review of responsive documents.
Fact depositions (Syngenta and third parties)		432.3	\$316,314.20			
	Attorneys Contract Attorneys Non-attorneys					
Defend fact depositions (of plaintiffs)		1060.3	\$837,424.80			Includes reviewing of documents in anticipation of specific depositions, preparation for depositions; taking depositions of witnesses for Syngenta and third parties.
	Attorneys Contract Attorneys Non-attorneys			5.5	\$1,078.00	Review of documents in antidpation of specific depositions.
Discovery file management		706.5	\$385,634.10			Preparation for and defense of Plaintiff depositions, including review of Plaintiff specific documents and meeting with individual Plaintiffs.
	Attorneys Contract Attorneys Non-attorneys			5.8	\$1,136.80	Assistance in deposition preparation.
				95.7	\$60,767.20	Organization and management of documents (including documents produced by Syngenta, third parties, and Plaintiffs).
	Attorneys Contract Attorneys Non-attorneys					

EXPERT WORK, DAUBERT MOTIONS				
Plaintiffs' expert witness work (including development of report, defense of depositions)		116.9	\$83,556.00	
	Attorneys Contract Attorneys Non-attorneys			Meeting with experts; collection and review of materials requested by experts; review of proposed reports by experts.
Defendant expert witness work (depositions)			1.7	\$1,081.20
	Attorneys Contract Attorneys Non-attorneys			
Daubert motion practice (plaintiff experts)				
	Attorneys Contract Attorneys Non-attorneys			
Daubert motion practice (defense experts)				
	Attorneys Contract Attorneys Non-attorneys			
PRETRIAL PREP, TRIAL, AND POST TRIAL				
Motions in limine				
	Attorneys Contract Attorneys Non-attorneys			
Trial (presenting witnesses and argument)				
	Attorneys Contract Attorneys Non-attorneys			
Trial briefing and jury instructions				
	Attorneys Contract Attorneys Non-attorneys			
Other pretrial motion practice				
	Attorneys Contract Attorneys Non-attorneys			
Post-trial briefing				
	Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients			22.9	\$15,290.00
	Attorneys Contract Attorneys Non-attorneys		14.5	\$2,842.00
Settlement negotiations		314.5	\$300,347.50	
	Attorneys Contract Attorneys Non-attorneys			Participation as the court-appointed Illinois litigation liaison in settlement negotiations throughout 2016 and 2017
Assisting clients in perfecting claims in settlement				
	Attorneys Contract Attorneys Non-attorneys			
Preparation of fee petition		125		
	Attorneys Contract Attorneys Non-attorneys			
ADMINISTRATIVE				
Administrative work as court-appointed leadership				

	Attorneys Contract Attorneys Non-attorneys	86.3 \$82,416.50		Coordination with MDL and Syngenta over the litigation as the court-appointed Illinois litigation liason.
OTHER (describe in Notes)	Attorneys	341.1 \$286,686.37	945 \$794,207.83	Approved "Other" hours include: communication and coordination with the MDL, communication with co-counsel to discuss litigation strategy, and communication with defense counsel unrelated to discovery disputes.
	Contract Attorneys			"Other Work" includes client procurement, client intake, and file administration work.
	Non-attorneys		663.5 \$130,046.00	

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees	\$ 145,000.00	
Postage	\$ 16,479.42	
Photocopying	\$ 33,781.81	
Hotels	\$ 41,368.20	
Meals	\$ 11,011.76	
Mileage	\$ 6,755.85	
Air Travel	\$ 87,056.67	
Common Benefit Assessment Fees		
Court Fees	\$ 58,100.35	Includes Filing Fees / Service Fees (International)
Transcript Fees	\$ 72,173.79	Transcripts of Depositions taken by Heninger Garrison Davis, LLC of Syngenta Representatives, and also costs of additional transcripts of other Representatives and transcript of the MDL Trial
Ground Transportation	\$ 9,410.91	
Expert/Consulting Fees Not Included in Common Benefit	\$ 18,993.75	
Special Master Fees	\$ 131,947.02	includes new invoice of 7/31/2018 (\$1,034.07) not on earlier expense submission
Miscellaneous	\$ 81,308.77	Expenses - Document Review System (Cicayda)
Miscellaneous	\$ 75.00	Grain Report Documents
Miscellaneous	\$ 397.50	Seminar Fee
Miscellaneous	\$ 58,040.87	Client Development Costs
Miscellaneous	\$ 1,013.00	Airport Parking Fees
Miscellaneous	\$ 13,811.84	Research Costs - Westlaw/PACER/Lexis

TOTAL \$ 786,726.51

ONDER LAW

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting						All categories: "Approved" Common Benefit Work under the terms of Document 936 - "Order Establishing Protocols for Common Benefit Work and Expenses..." is defined in part as having been formally approved by Lead Counsel. Other descriptive/definition elements reference tasks of various types, many of which were performed by OnderLaw, LLC staff and attorneys throughout the course of the litigation. OnderLaw, LLC hours entered as "Approved Common Benefit Work" are established from tasks and client service events believed to be substantially equivalent to those tasks formally approved. The work done by OnderLaw, LLC on behalf of its clients, as well as the work done by co-counsel, accrued to the common benefit of all producer plaintiffs nationwide. OnderLaw, LLC hours entered under "Other Work" are those tasks and client service
	Attorneys	194	\$126,100.00	171.8	\$111,670.00	
	Contract Attorneys					
	Non-attorneys	72	\$12,600.00	20.3	\$3,552.50	
Dispositive motion briefing/argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review						
	Attorneys	515.8	\$335,270.00	54.3	\$35,295.00	
	Contract Attorneys					
	Non-attorneys	310.7	\$54,372.50			
Paper discovery (Syngenta and third parties)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs						
	Attorneys	245.4	\$159,510.00			
	Contract Attorneys					
	Non-attorneys	97.5	\$17,062.50			
Discovery motion practice and communications with adverse parties						
	Attorneys	15	\$9,750.00			
	Contract Attorneys					
	Non-attorneys	12	\$2,100.00			
Fact depositions (Syngenta and third parties)	Attorneys					Includes: Plaintiff preparation for Deposition; Attorney preparation during travel; Conduct of
Defend fact depositions (of plaintiffs)	Attorneys	230.7	\$149,995.00			
Discovery file management	Attorneys	67.8	\$44,070.00			
	Non-Attorneys	65	\$11,375.00			
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defendant expert witness work						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (plaintiff experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (defense experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial (presenting witnesses and argument)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					

Trial briefing and jury instructions						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients						
	Attorneys	740.1		\$481,065.00		
	Contract Attorneys					
	Non-attorneys	952.9		\$166,757.50		
Settlement negotiations						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement						
	Attorneys	113.1		\$73,515.00		
	Contract Attorneys					
	Non-attorneys	202.6		\$35,455.00		
Preparation of fee petition						
	Attorneys	371.4		\$241,410.00		
	Non-attorneys	1106.7		\$193,672.50		
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys					
Administrative Management: litigation oversight and operations	Attorneys			630.8	\$410,020.00	Management of the litigation; setting policies and procedures; assisting staff attorneys in drafting pleadings; review of pleadings including motions, orders, etc; monitoring litigation-related news; development and direction of strategy in collaboration with co-counsel; communications with leadership; creation of work product.
	Non-Attorneys			267	\$46,725.00	Support roles for staff attorneys and managing partner as to: Scheduling, tracking calendars in the various venues, assisting with management of the litigation, setting policies and procedures; assisting staff attorneys in drafting pleadings; review of pleadings including motions, orders, etc; monitoring litigation-related news, development and direction of strategy in collaboration with co-counsel; communications with leadership; creation
OTHER (describe in Notes)						
Access, archive, track and review pleadings, motions, orders, etc.	Attorneys			538.03	\$383,695.00	Litigation Tracking & Document Review: All filings accessed and archived by staff, were also reviewed by Attorneys in order to understand key issues and developments in the several venues. Litigation tracking allowed competent and efficient representation of our plaintiffs, and made firmwide strategy with respect to our clients' cases
	Non-Attorneys			167.7	\$29,347.50	
Conference Calls with Co-Counsels	Attorneys			23.1	\$15,015.00	Provide regular litigation reporting and receive regular litigation updates from co-counsel in the litigation, including discussions with leadership, Heninger Garrison and Davis litigation team, Wendell Hoskins, and numerous others. Counsel engaged in strategy discussions, including but not limited to evaluations of discovery, depositions, motions, orders, and other litigation developments. These conference calls were essential to competent

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 4,570.46	
Photocopying	\$ 19.75	
Hotels		
Meals		
Mileage	\$ 4,022.07	
Air Travel	\$ 10,133.62	
Common Benefit Assessment Fees		
Court Fees	\$ 11,726.84	
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)	\$ 228,411.51	Communication and Marketing (Client Outreach, Contact, and Media
	\$ 7,102.65	Deposition, Westlaw, and Document costs
TOTAL	\$ 265,986.90	

CRUMLEY ROBERTS

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Dispositive motion briefing/argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys					
	Contract Attorneys					
	Non-attorneys	2417	\$473,732.00			
Paper discovery (Syngenta and third parties)	Attorneys	313	\$116,765.00			
	Contract Attorneys					
	Non-attorneys	839	\$164,444.00			
Paper discovery against plaintiffs	Attorneys	108.1	\$77,507.70			
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defend fact depositions (of plaintiffs)	Attorneys	76.5	\$54,850.50			
	Contract Attorneys					
	Non-attorneys					
Discovery file management	Attorneys					
	Contract Attorneys					
	Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defendant expert witness work (depositions)	Attorneys					

	Contract Attorneys Non-attorneys			
Daubert motion practice (plaintiff experts)	Attorneys Contract Attorneys Non-attorneys			
Daubert motion practice (defense experts)	Attorneys Contract Attorneys Non-attorneys			
PRETRIAL PREP, TRIAL, AND POST TRIAL				
Motions in limine	Attorneys Contract Attorneys Non-attorneys			
Trial (presenting witnesses and argument)	Attorneys Contract Attorneys Non-attorneys			
Trial briefing and jury instructions	Attorneys Contract Attorneys Non-attorneys			
Other pretrial motion practice	Attorneys Contract Attorneys Non-attorneys			
Post-trial briefing	Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients	Attorneys Contract Attorneys Non-attorneys			
Settlement negotiations	Attorneys Contract Attorneys Non-attorneys			
Assisting clients in perfecting claims in settlement	Attorneys Contract Attorneys Non-attorneys			
Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys	6 16	\$4,302.00 \$3,136.00	
ADMINISTRATIVE				
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys			

OTHER (describe in Notes)	Attorneys Contract Attorneys Non-attorneys	39 \$27,963.00		Status conferences
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3814.6 \$922,700.20

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 1,373.98	
Photocopying		
Hotels	\$ 5,660.46	
Meals	\$ 2,577.17	
Mileage		
Air Travel	\$ 6,165.30	
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation	\$ 1,120.69	
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)	\$ 1,275.94	Computer equipment rental for document review
TOTAL	\$ 18,173.54	

BURKE HARVEY, LLC

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys Contract Attorneys Non-attorneys					
Dispositive motion briefing/argument	Attorneys Contract Attorneys Non-attorneys					
Class certification motion briefing and argument	Attorneys Contract Attorneys Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys Contract Attorneys Non-attorneys			52.13	400,881.73	
Paper discovery (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys					
Paper discovery against plaintiffs	Attorneys Contract Attorneys Non-attorneys			85.29	49,899.95	
Discovery motion practice and communications with adverse parties	Attorneys Contract Attorneys Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys					
Defend fact depositions (of plaintiffs)	Attorneys Contract Attorneys Non-attorneys			40	30,160.00	
Discovery file management	Attorneys Contract Attorneys Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys Contract Attorneys Non-attorneys					
Defendant expert witness work (depositions)	Attorneys					

	Contract Attorneys Non-attorneys			
Daubert motion practice (plaintiff experts)	Attorneys Contract Attorneys Non-attorneys			
Daubert motion practice (defense experts)	Attorneys Contract Attorneys Non-attorneys			
PRETRIAL PREP, TRIAL, AND POST TRIAL				
Motions in limine	Attorneys Contract Attorneys Non-attorneys			
Trial (presenting witnesses and argument)	Attorneys Contract Attorneys Non-attorneys			
Trial briefing and jury instructions	Attorneys Contract Attorneys Non-attorneys			
Other pretrial motion practice	Attorneys Contract Attorneys Non-attorneys			
Post-trial briefing	Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients	Attorneys Contract Attorneys Non-attorneys			
Settlement negotiations	Attorneys Contract Attorneys Non-attorneys			
Assisting clients in perfecting claims in settlement	Attorneys Contract Attorneys Non-attorneys			
Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys			
ADMINISTRATIVE				
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys			

OTHER (describe in Notes)				
	Attorneys Contract Attorneys Non-attorneys			

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 37.26	
Photocopying	\$ 1,052.00	
Hotels	\$ 2,603.84	
Meals	\$ 427.60	
Mileage	\$ 1,523.91	
Air Travel	\$ 2,933.83	
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation	\$ 432.00	
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$ 9,010.44	

HANSEN HOWELL & WILKIE, PLLC

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Dispositive motion briefing/argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review						
	Attorneys	19.8	\$14,196.60			
	Contract Attorneys					
	Non-attorneys	55.7	\$10,917.20			
Paper discovery (Syngenta and third parties)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defend fact depositions (of plaintiffs)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Discovery file management						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)						
	Attorneys					
	Contract Attorneys					

	Non-attorneys					
Defendant expert witness work (depositions)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (plaintiff experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (defense experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial (presenting witnesses and argument)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial briefing and jury instructions						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients						
	Attorneys	11.3	\$8,102.10			
	Contract Attorneys					
	Non-attorneys	67.9	\$13,308.40			
Settlement negotiations						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement						
	Attorneys	1.3	\$932.10			
	Contract Attorneys					
	Non-attorneys	108.6	\$21,285.60			
Preparation of fee petition						
	Attorneys	1.5	\$1,075.50			

Hansen Howell Wilkie, PLLC

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	Contract Attorneys					
	Non-attorneys	3.5	\$686.00			
ADMINISTRATIVE						
Administrative work as court-appointed leadership						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
OTHER (describe in Notes)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 99.87	
Photocopying	\$ 2,135.60	10,678 pages @ .20 per page
Hotels		
Meals		
Mileage	\$ 356.31	666 miles @ 53.5 per mile
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$2,591.78	

MERKEL & COCKE

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys Contract Attorneys Non-attorneys					
Dispositive motion briefing/argument	Attorneys Contract Attorneys Non-attorneys					
Class certification motion briefing and argument	Attorneys Contract Attorneys Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys Contract Attorneys Non-attorneys	26.6	\$21,090.70			Charles M. Merkel, III
Paper discovery (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys					
Paper discovery against plaintiffs	Attorneys Contract Attorneys Non-attorneys	14	\$10,218.15			Charles M. Merkel, III and John H.Cocke Responses to Rogs and RFP to Plaintiffs
Discovery motion practice and communications with adverse parties	Attorneys Contract Attorneys Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys	14	10,218.15			Charles M. Merkel, III and John H. Cocke Witness prep and attendance at Plaintiffs depositions
Defend fact depositions (of plaintiffs)	Attorneys Contract Attorneys Non-attorneys					
Discovery file management	Attorneys Contract Attorneys Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys Contract Attorneys Non-attorneys					
Defendant expert witness work (depositions)	Attorneys Contract Attorneys Non-attorneys					
Daubert motion practice (plaintiff experts)	Attorneys Contract Attorneys Non-attorneys					
Daubert motion practice (defense experts)						

	Attorneys Contract Attorneys Non-attorneys			
PRETRIAL PREP, TRIAL, AND POST TRIAL				
Motions in limine	Attorneys Contract Attorneys Non-attorneys			
Trial (presenting witnesses and argument)	Attorneys Contract Attorneys Non-attorneys			
Trial briefing and jury instructions	Attorneys Contract Attorneys Non-attorneys			
Other pretrial motion practice	Attorneys Contract Attorneys Non-attorneys			
Post-trial briefing	Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients	Attorneys Contract Attorneys Non-attorneys			
Settlement negotiations	Attorneys Contract Attorneys Non-attorneys			
Assisting clients in perfecting claims in settlement	Attorneys Contract Attorneys Non-attorneys			
Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys			
ADMINISTRATIVE				
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys			
OTHER (describe in Notes)	Attorneys Contract Attorneys Non-attorneys	4	\$784.00	Preparation of time sheet; administrative communication, client correspondence

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 141.85	
Photocopying	\$ 280.40	
Hotels		
Meals		
Mileage	\$ 51.70	
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous	\$ 5.00	Copies of CD's
Miscellaneous	\$ 38.00	Facsimile Expense
TOTAL	\$ 516.95	

LAW OFFICES OF WENDELL HOSKINS

LEGAL FEES		Approved Common Benefit		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys	177.7	\$ 84,407.30			
	Contract Attorneys	0	\$ -			
	Non-attorneys	307.8	\$ 32,319.00			
Dispositive motion briefing/argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys	37.4	\$ 17,765.00			
	Contract Attorneys	0	\$ -			
	Non-attorneys	1586.2	\$ 54,758.64			
Paper discovery (Syngenta and third parties)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys					
Defend fact depositions (of plaintiffs)	Contract Attorneys Non-attorneys					
Discovery file management	Attorneys					
	Contract Attorneys Non-attorneys					
	Attorneys					
	Contract Attorneys Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defendant expert witness work	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (plaintiff experts)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (defense experts)	Attorneys					
	Contract Attorneys					
	Non-attorneys					

	Attorneys Contract Attorneys Non-attorneys			
PRETRIAL PREP, TRIAL AND POST TRIAL				
Motions in limine	Attorneys Contract Attorneys Non-attorneys			
Trial (presenting witnesses and argument)	Attorneys Contract Attorneys Non-attorneys			
Trial briefing and jury instructions	Attorneys Contract Attorneys Non-attorneys			
Other pretrial motion practice	Attorneys Contract Attorneys Non-attorneys			
Post-trial briefing	Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients	Attorneys Contract Attorneys Non-attorneys	362.3 \$ 172,092.50 0 \$ - 1301.9 \$ 92,395.15		
Settlement negotiations	Attorneys Contract Attorneys Non-attorneys			
Assisting clients in perfecting claims in settlement	Attorneys Contract Attorneys Non-attorneys	20.9 \$ 9,927.50 0 \$ - 0 \$ -		
Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys			
ADMINISTRATIVE				
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys			
OTHER (describe in Notes)				
	Attorneys Contract Attorneys Non-attorneys			

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EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage Photocopying Hotels		
Meals Mileage Air Travel		
Common Benefit Assessment Fees Court Fees		
Transcript Fees Ground Transportation		
Expert/Consulting Fees Not Included in		
Common Benefit Special Master Fees		
Miscellaneous (Describe)		

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		
Photocopying		
Hotels		
Meals		
Mileage		
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous	\$ 48,779.29	Clerical / Processing Costs
TOTAL	\$ 48,779.29	

OLDFIELD MYERS APKE & PAYNE

LEGAL FEES	TASK PERFORMED	TIMEKEEPER	Approved		Other Work		Notes
			Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS							
Complaint drafting							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Dispositive motion briefing/argument							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Class certification motion briefing and argument							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
DISCOVERY, DEPOSITIONS, DOC REVIEW							
Plaintiff fact sheet preparation/review							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Paper discovery (Syngenta and third parties)							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Paper discovery against plaintiffs							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Discovery motion practice and communications with adverse parties							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Fact depositions (Syngenta and third parties)		Attorneys					
Defend fact depositions (of plaintiffs)		Attorneys					
Discovery file management		Attorneys					
	Non-Attorneys						
EXPERT WORK, DAUBERT MOTIONS							
Plaintiffs' expert witness work (including development of report, defense of depositions)							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Defendant expert witness work							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Daubert motion practice (plaintiff experts)							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Daubert motion practice (defense experts)							
	Attorneys						
	Contract Attorneys						
	Non-attorneys						
PRETRIAL PREP, TRIAL, AND POST TRIAL							
Motions in limine		Attorneys					
	Contract Attorneys						

	Non-attorneys					
Trial (presenting witnesses and argument)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial briefing and jury instructions						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients						Fees relate to direct communication with farmers regarding their claims. Staff time spent in direct communication with farmers regarding their claims.
	Attorneys			88.79	\$22,261.50	
	Contract Attorneys					
	Non-attorneys			156.25	\$5,002.00	
Settlement negotiations						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Preparation of fee petition						
	Attorneys					
	Non-attorneys					
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys					
Administrative Management: litigation oversight and operations	Attorneys					
	Non-Attorneys					
OTHER (describe in Notes)						
Access, archive, track and review pleadings, motions, orders, etc.	Attorneys					
	Non-Attorneys					

Conference Calls with Co-Counsels	Attorneys					
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EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$ 213.87	
Photocopying	\$ 895.00	
Hotels		
Meals		
Mileage		
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous	\$ 0.70	Research
Miscellaneous	\$ 0.30	Telephone Calls
Miscellaneous	\$ 11.70	Fax Charges
TOTAL	\$ 1,121.57	

Tapella & Eberspacher

LEGAL FEES		Approved Common Benefit		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys Contract Attorneys Non-attorneys	2.90	855.00			
Dispositive motion briefing/argument	Attorneys Contract Attorneys Non-attorneys					
Class certification motion briefing and argument	Attorneys Contract Attorneys Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys Contract Attorneys Non-attorneys	40.30 195.20	10,830.00 19,605.00			
Paper discovery (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys					
Paper discovery against plaintiffs	Attorneys Contract Attorneys Non-attorneys					
Discovery motion practice and communications with adverse parties	Attorneys Contract Attorneys Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys Contract Attorneys Non-attorneys					
Defend fact depositions (of plaintiffs)	Attorneys Contract Attorneys Non-attorneys					
Discovery file management	Attorneys Contract Attorneys Non-attorneys	70.90	7,090.00			
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys Contract Attorneys Non-attorneys					
Defendant expert witness work	Attorneys Contract Attorneys Non-attorneys					
Daubert motion practice (plaintiff experts)	Attorneys Contract Attorneys Non-attorneys					
Daubert motion practice (defense experts)	Attorneys Contract Attorneys Non-attorneys					
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine	Attorneys Contract Attorneys Non-attorneys					

LEGAL FEES		Approved Common Benefit		Other Work	Notes
Trial (presenting witnesses and argument)	Attorneys Contract Attorneys Non-attorneys				
Trial briefing and jury instructions	Attorneys Contract Attorneys Non-attorneys				
Other pretrial motion practice	Attorneys Contract Attorneys Non-attorneys				
Post-trial briefing	Attorneys Contract Attorneys Non-attorneys				
SETTLEMENT AND SETTLEMENT ADMINISTRATION					
Pre-settlement communication with clients	Attorneys Contract Attorneys Non-attorneys	5.60	1,680.00		
Settlement negotiations	Attorneys Contract Attorneys Non-attorneys				
Assisting clients in perfecting claims in settlement	Attorneys Contract Attorneys Non-attorneys				
Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys	150	450.00		
ADMINISTRATIVE					
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys				
OTHER (describe in Notes)					
	Attorneys Contract Attorneys Non-attorneys		698.25		
Grand Total		316.40	41,208.25		

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		
Photocopying	\$ 345.45	
Hotels		
Meals		
Mileage		
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$ 345.45	

SAM C MITCHELL & ASSOCIATES

LEGAL FEES		Approved Common Benefit Work		Other		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Dispositive motion briefing/argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review						
	Attorneys	12	\$3,000.00			
	Contract Attorneys					
	Non-attorneys	13.6	\$1,360.00			
Paper discovery (Syngenta and third parties)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs						
	Attorneys	4.6	\$1,150.00			
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys					
Defend fact depositions (of plaintiffs)	Attorneys					
Discovery file management	Attorneys	1.6	\$400.00			
	Non-Attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defendant expert witness work						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (plaintiff experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (defense experts)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial (presenting witnesses and argument)						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					

Trial briefing and jury instructions						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients						
	Attorneys	15.6	\$3,900.00			
	Contract Attorneys					
	Non-attorneys	0.7	\$70.00			
Settlement negotiations						
	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement						
	Attorneys	0.3	\$75.00			
	Contract Attorneys					
	Non-attorneys	1.4	\$140.00			
Preparation of fee petition						
	Attorneys					
	Non-attorneys					
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys					
Administrative Management: litigation oversight and operations	Attorneys					
	Non-Attorneys					
OTHER (describe in Notes)						
Access, archive, track and review pleadings, motions, orders, etc.	Attorneys	9.3	\$2,325.00			Conferences and personal meetings with counsel and potential co-counsels to review pleadings and status of pending claims to plan outreach to potential farm clients and strategize the most appropriate avenues to pursue for individual clients
	Non-Attorneys	1.4	\$140.00			
Conference Calls with Co-Counsels	Attorneys					

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		
Photocopying	\$ 1,044.22	
Hotels		
Meals	\$651.74	
Mileage		
Air Travel	\$1,748.00	
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$ 3,443.96	