

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS**

IN RE: SYNGENTA AG MIR162)	MDL No. 2591
CORN LITIGATION)	
)	Case No. 2:14-MD-02591-JWL-JPO
This Document Relates to:)	
)	
<i>Catherine Alderman, et al. v. Syngenta</i>)	
<i>Corporation, et al.</i>)	
<i>2:16-cv-02329-JWL-JPO</i>)	
)	
<i>D & C Thornton Farms, et al.</i>)	
<i>v. Syngenta Corporation, et al.</i>)	
<i>2:16-cv-2330-JWL-JPO</i>)	
)	
<i>McLendon Farms, et al. v.</i>)	
<i>Syngenta Corporation, et al.</i>)	
<i>2:16-cv-02331-JWL -PO</i>)	
)	
)	
)	

BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.’S
SUPPLEMENT TO ATTORNEYS’ FEE AND EXPENSE APPLICATION

Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. (hereinafter “the Firm”) pursuant to this Court’s Order of July 18, 2018 (Doc 3613), files this Supplement in further support of the Firm’s Fee and Expense Application (Doc. 3577) submitted on July 10, 2018 for an award of attorneys’ fees and reimbursement of costs incurred in the prosecution of this litigation.

The Firm supplements its application with the Court’s Excel spreadsheet (See Exhibit A) summarizing the Firm’s work in representing the thirty-six (36) Plaintiffs independently from Plaintiffs’ Steering Committee and Lead Counsel. The Firm spent a total of 489.3 hours on this litigation, which is \$192,744.00 at our usual and customary hourly rates, and incurred \$20,762.81 in expenses. (See Exhibit B, Declaration of Leslie L. Pescia).

The undersigned respectfully moves the Court for an award of fair and reasonable fees and expenses for their time and efforts in this matter.

RESPECTFULLY SUBMITTED, this 3rd day of August 2018

/s/ Leslie L. Pescia

LESLIE L. PESCIA [ASB-0224-U14E]

W. DANIEL MILES, III [ASB-7656-M75W]

BEASLEY, ALLEN, CROW,

METHVIN, PORTIS & MILES, P.C.

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 3, 2018, the foregoing document was filed utilizing the Court's CM/ECF system which sent notification to all registered parties.

/s/ Leslie L. Pescia

Of Counsel

IN RE: SYNGENTA AG MIR162
 CORN LITIGATION: MDL No. 2591
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Supplement to Fee Submission
 of Beasley Allen (Doc 3577)

Beasley Allen, P.C..
 218 Commerce Street
 Montgomery, AL 36104

	A	B	C	D	E	F	G
1	LEGAL FEES		Approved Common Benefit		Other Work		Notes
2	TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
3	PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
4	Complaint drafting; Remand Motions/Briefs; Notice to Conform	Attorneys			17.5	\$ 6,125.00	
5		Non-attorneys			21.13	\$ 3,486.45	
6	DISCOVERY, DEPOSITIONS, DOC REVIEW						
7	Plaintiff fact sheet preparation/review including collection, organization and submitting PFS's via lead counsel's portal; preparation of PFS packages for clients	Non-attorney			72.8	\$ 12,012.00	
8							
9	EXPERT WORK, DAUBERT MOTIONS						
10	PRETRIAL PREP, TRIAL, AND POST TRIAL						
11	SETTLEMENT AND SETTLEMENT ADMINISTRATION						
12	Pre-settlement communication with clients by written communication	Attorneys			16.8	\$ 7,605.00	
13		Non-attorneys			18.6	\$ 3,069.00	
14							
15	Preparation of fee petition	Attorneys			0.9	\$ 540.00	
16	ADMINISTRATIVE						
17	Administrative work as court-appointed leadership						
18	OTHER (describe in Notes)						
19	Hearings/Meetings/Travel	Attorneys			230	\$ 125,180.00	Prepare for, travel to and attend multiple court hearings and status conferences in MN, SC and KS; communicate, prepare for and attend meetings with other attorneys re: case development, leadership, clients, case strategy and client development; drafting/editing speaking notes and presentations for meetings and hearings

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	A	B	C	D	E	F	G
20	Case work	Attorneys			70.5	\$ 27,950.00	Drafting/editing leadership applications, pre-suit research for complaints across multiple districts; telephone calls and email correspondence with co-counsel, referring attorneys, clients and staff regarding clients, case strategy, and case status; client research; identifying and vetting clients and potential class reps; defendant research; attend court status conferences by telephone (not reflected in above section); continuous review of all case and client information; continuous review of all relevant pleadings, orders, and case updates; communicate with attorneys, staff and clients regarding case status
21	Administrative and Paralegal	Non-attorneys			41.07	\$ 6,776.55	Organization of case/client files; update attorneys and calendars; communicate with clients and attorneys regarding case status and relevant filings; assist in preparation of complaints, motions, briefs, exhibits and other filings; prepare atty and client correspondence; efile documents; download all filed pleadings, orders and other filings in both KS and MN; research case and jurisdiction issues; telephone calls and emails with clients re: case and re: PFs and relevant documents for production; Communicate with court staff and lead counsel re: filings
22	TOTAL FEES				489.3	\$ 192,744.00	

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	A	B	C
1	EXPENSES PAID	Amount	Notes
2			
3			
4	Common Benefit Assessment Fees		
5	Postage	\$ 792.99	
6	Photocopying	\$ 957.39	
7	Hotels	\$ 4,450.10	
8	Meals	\$ 496.88	
9	Mileage		
10	Air Travel	\$ 8,070.10	
11	Common Benefit Assessment Fees		
12	Court Fees	\$ 2,533.00	
13	Transcript Fees		
14	Ground Transportation	\$ 1,339.44	
15	Expert/Consulting Fees Not Included in Common Benefit		
16	Special Master Fees		
17	Miscellaneous (Describe)	\$ 647.25	Research
18		\$ 621.66	Process Servers
19		\$ 854.00	Telephone charges
20	TOTAL	\$ 20,762.81	

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS**

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)	
)	
)	

**DECLARATION OF LESLIE L. PESCIA FOR
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.
IN SUPPORT OF SUPPLEMENT TO FEE AND EXPENSE SUBMISSION**

I, Leslie L. Pescia, declare as follows:

1. I am over the age of twenty-one years old and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently to the facts contained herein, which are true and correct.

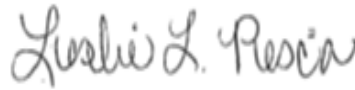
2. I am authorized to submit this declaration on behalf of Beasley, Allen Crow, Methvin, Portis & Miles, P.C. (hereinafter “the Firm”).

3. I submit this declaration in support of the Firm’s Supplement to its Fee and Expense Application pursuant to Hon. John W. Lungstrum’s Order (Doc. 3613) regarding attorney fee submissions in the case *In Re: Syngenta AG MIR 162 Corn Litigation*, (MDL-2591) in the U.S. District Court for the District of Kansas.

4. The Firm spent a total of 489.3 hours on this litigation, which is \$192,744.00 at our usual and customary hourly rates¹, and incurred \$20,762.81 in expense.

5. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct and the spreadsheet is a true/accurate reflection of the motion filed in support of these expenses (Doc. 3577).

Executed on this 3rd day of August 2018, in Montgomery, Alabama.



LESLIE L. PESCIA [ASB-0224-U14E]
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Leslie.Pescia@Beasleyallen.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 3, 2018, the foregoing document was filed utilizing the Court's CM/ECF system which sent notification to all registered parties.

/s/ Leslie L. Pescia
Of Counsel

¹ W. Daniel "Dee" Miles, III: \$675 usual and customary hourly rate, 82.4 hours, total \$55,620; C. Lance Gould: \$600 usual and customary hourly rate, 20.9 hours, total \$12,540; Roman A. Shaul: \$600 usual and customary hourly rate, 71.6 hours, total \$42,960; Leslie L. Pescia: \$350 usual and customary hourly rate, 160.8 hours, total \$56,280; and Brenda Russell: \$165 usual and customary hourly rate, 153.6 hours, total \$25,344.