

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

**IN RE: SYNGENTA AG MIR162
CORN LITIGATION**

This Document Relates to All Cases Except:

*Louis Dreyfus Co. Grains
Merchandising LLC v. Syngenta AG,
No. 16-2788*

*Trans Coastal Supply Co., Inc. v.
Syngenta AG, No. 14-2637*

*The Delong Co., Inc. v. Syngenta AG,
No. 17-2614*

*Agribase Int'l Inc. v. Syngenta AG, No.
15-2279*

MDL No. 2591

Case No. 2:14-md-2591-JWL-JPO

**THE BRAD MORRIS LAW FIRM PLLC MOTION FOR AWARD OF ATTORNEYS'
FEES AND REIMBURSEMENT OF EXPENSES**

The Brad Morris Law Firm PLLC (the “BMLF”), pursuant to this Court’s Order Preliminarily Approving the Settlement in this case and dated April 10, 2018 and Federal Rule of Civil Procedure 23, hereby moves the Court for an award of its attorneys’ fees and recoverable costs and expenses. BMLF represents clients on more than eighty (80) claims in this litigation. BMLF seeks payment of the contractually agreed upon fees and expense reimbursement between the firm and all clients who receive a settlement award. BMLF respectfully asks the Court to pay any attorney fee and expense award from the fund created to pay attorneys’ fees and expenses arising out of the preliminarily approved Syngenta litigation settlement (the “Fund”). In the

alternative, if the Court sets aside the contingency fee agreements between the Firm and its clients, BMLF seeks payment from the Fund based on its clients' proportionate share of acreage compensated in the Settlement, which is reasonably expected to be a fee in excess of \$500,000. Finally, if the court bases its approval of attorney fees on an hourly or *quantum meruit* basis, BMLF seeks leave from the court to submit supplemental materials detailing hourly billing and expenses upon direction from the court. Although the case management system of BMLF tracks detailed time entries, for the present litigation some time entries are recorded in a central file for general work performed on the litigation while other entries are recorded in the individual case file for each claimant. In order to present the court with accurate lodestar billing, BMLF would have to generate over eighty individual invoices within the case management system. BMLF requests that it not be required to incur the time and expense to generate this documentation until the court determines the method to be used to calculate attorneys' fees. This Motion for Award of Attorneys' Fees and Reimbursement of Expenses is supported by the accompanying Memorandum in Support and the Declaration of Brad Morris.

Dated: July 10, 2018

Respectfully Submitted,

/s/ Brad Morris

Brad Morris (Ms Bar #104017)

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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

/s/ Brad Morris