

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

**IN RE SYNGENTA AG MIR 162 CORN
LITIGATION**

**THIS DOCUMENT RELATES TO ALL
CASES EXCEPT:**

*Louis Dreyfus Company Grains Merchandising
LLC v. Syngenta AG, et al., No. 16-2788-JWL-
JPO*

*Trans Coastal Supply Company, Inc. v.
Syngenta AG, et al., No. 2:14-cv-02637-JWL-
JPO*

*The Delong Co., Inc. v. Syngenta AG et al., No.
2:17-cv-02614-JWL-JPO*

*Agribase International Inc. v. Syngenta AG, et
al., No. 2:15-cv-02279-JWL-JPO*

The Honorable John W. Lungstrum

Master File No. 2:14-MD-02591-JWL-JPO

MDL No. 2591

**THE EILAND LAW FIRM'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

The Law Offices of A. Craig Eiland, PC (the "Eiland Law Firm"), 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. The Eiland Law Firm seeks payment of the contractually agreed upon fees and expense reimbursement between the firm and all clients who receive a settlement award. The Eiland Law Firm 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, the Eiland Law Firm 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 \$10,000,000. Finally, if the court bases its attorney fee award on an hourly basis, the Eiland Law Firm seeks a minimum amount of \$7,300,937 in fees and \$53,685 in expenses as detailed in the Supporting Memorandum. This Motion for Award of Attorneys' Fees and Reimbursement of Expenses is supported by the accompany Memorandum in Support and the Declaration of A. Craig Eiland.

Dated: July 10, 2018

Respectfully submitted,

/s/ A. Craig Eiland

A. Craig Eiland

Texas State Bar No. 06502380

THE LAW OFFICES OF A. CRAIG EILAND, PC

2211 The Strand, Suite 201

Galveston, Texas 77550

Telephone: 409-763-3260

Facsimile: 713-513-5211

Email: ceiland@eilandlaw.com

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/ A. Craig Eiland