

Law Offices of A. Craig Eiland

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting						Drafting, reviewing, and finalizing 9 Illinois State Court Complaints on behalf of 834 clients; filed by local counsel in the Circuit Court of the First Judicial Circuit of Williamson County, Illinois; Preparing 90 Summonses
	Attorneys			88.00	\$55,000.00	
	Contract Attorneys					
	Non-attorneys					
Dispositive motion briefing/argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument						Drafting, reviewing, and finalizing Certain Producers Class Members' Objection to Class Counsel's Proposed Class Notice (Doc. 2645)
	Attorneys			30.00	\$18,750.00	
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review						Reviewing approximately 50,000 pages of client farm records (including FSA Form 578s, crop insurance, seed corn receipts, sales contracts, and settlement statements)
	Attorneys			815.00	\$509,375.00	
	Contract Attorneys					
	Non-attorneys					
Paper discovery (Syngenta and third parties)						Reviewing Syngenta's document production produced in Illinois litigation; specifically for certain Syngenta employees; preparing deposition hot doc outlines for those certain employees (including document review time tracked by Advansic program)
	Attorneys			320.00	\$160,000.00	
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and	Attorneys					

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TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
communications with adverse parties	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					
<b>EXPERT WORK, DAUBERT MOTIONS</b>						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys			26.00	\$19,500.00	Working with coordinating Illinois counsel on the development of expert reports
	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					
<b>PRETRIAL PREP, TRIAL, AND POST TRIAL</b>						
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					

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TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
Other pretrial motion practice	Attorneys			4.00	\$2,500.00	Drafting and filing Motion for Extension of Time to File Response to Motion to Amend Nationwide and Kansas Class Judgment by Interested Party Eiland Plaintiffs (Doc. 3369); Drafting and Filing Consent Motion for Extension of Time and Stipulated Briefing Schedule (Doc. 3387)
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients	Attorneys			4015.00	\$2,509,375.00	Nearly four years of client communications including numerous in-person meetings, phone calls, emails, and update letter correspondence regarding fact sheet requirements, requesting the farm record necessary to complete the PFS, updating and reporting on important case activity and developments including the over 30 hearings attended by counsel; assisting clients with farm record retrieval.
	Contract Attorneys					
	Non-attorneys					
Settlement negotiations	Attorneys					
	Contract Attorneys					
	Non-attorneys					

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Assisting clients in perfecting claims in settlement						Drafting, reviewing, preparing, and sending Claim Form Packet to clients with pre-filled claim forms to clients and explanation and instruction for making a claim; Receipt and review of Client Claim Forms; confirming forms are completed correctly; daily communication with clients re questions on how to correctly fill out the claim forms; following up with clients who have not submitted a claim; submitting a claim on behalf of clients
	Attorneys			330.00	\$165,000.00	
	Contract Attorneys					
	Non-attorneys			330.00	\$41,250.00	
Preparation of fee petition	Attorneys			150.00	\$87,500.00	
	Contract Attorneys					
	Non-attorneys			156.00	\$19,500.00	
<b>ADMINISTRATIVE</b>						
Administrative work as court-appointed leadership	Attorneys					
	Contract Attorneys					
	Non-attorneys					
<b>OTHER (describe in Notes)</b>						
Excluding clients from class action	Attorneys			500.00	\$250,000.00	Work on excluding clients from Class Action; communicate and follow-up with clients; receipt and review of exclusion forms; resolve issues; daily communication with clients re questions and reminders; organizing opt outs; creating opt out index for Analytics in order to identify and find each opt out; transmitting to Analytics by opt out deadline; Work on confirming clients are identified as a valid exclusion, identifying "missing" clients, identify deficient clients; working to resolve deficiencies; drafting and sending letter to C. Ellis and M. Kopperud re Class Exclusion Discrepancies (with identified discrepancies attached)

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TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
Illinois Coordinating Counsel Work	Contract Attorneys					
	Non-attorneys					
	Attorneys			650.00	\$415,000.00	Working with coordinating counsel with cases pending in Illinois including numerous in-person meetings, conference calls, emails, and other correspondence re case strategy and development, experts, motion practice, discovery matters, document review, hearing preparation, etc.
	Contract Attorneys					
	Non-attorneys					
Hearings and related travel	Attorneys			340.00	220,00	Attending approximately 30 hearings (approximately 15 in-person) in Kansas City, Williamson County, Illinois, and the Southern District of Illinois
	Contract Attorneys					
	Non-attorneys					
Administrative Work	Attorneys					
	Contract Attorneys					
	Non-attorneys			5500.00	\$687,500.00	Full time legal assistant dedicated to Syngenta litigation work over the last 3.5 years and the work of five other staff members as required
<b>Total</b>				<b>13254.00</b>	<b>\$4,940,250.00</b>	

<b>LAW OFFICES OF A CRAIG EIALND EXPENSES PAID</b>	<b>Amount</b>	<b>Notes</b>
Common Benefit Assessment Fees		
Postage	\$ 17,087.72	
Photocopying	\$ 19,954.00	
Hotels	\$ 2,139.56	
Meals	\$ 1,083.06	
Mileage		
Air Travel	\$ 11,525.10	
Common Benefit Assessment Fees		
Court Fees	\$ 4,393.40	
Transcript Fees	\$ 18.90	
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
<b>TOTAL</b>	<b>\$ 56,201.74</b>	