

This Application for Attorney's Fees and Expenses is supported by the attached Declaration of counsel, Shaun Hodge, (*see Exhibits C and D*), and includes corresponding time sheet, expense itemization, and client listing (*see Exhibits A, B and C*, respectively). Fees and expenses are sought for the entirety of representation. Through its representation thus far, the Firm has expended 1,316.75 hours of time, for a total of \$565,887.50 in attorneys' fees, and incurred costs in the amount of \$46,897.87 on behalf of the Hodge Plaintiffs.

The Hodge Law Firm, PLLC, and associated counsel are proud to represent 83 producers across the great state of Iowa. *See Exhibit A*. Our Firm believes it is crucial to meet with clients in person and develop a strong attorney-client relationship so we can effectively represent their interests. In this case, it was even more critical so that we could understand the true impact the drop in bushel price had on each Hodge Plaintiff. We personally met with each and every one of our clients on multiple occasions during the course of this litigation.

The Firm worked extensively with all Hodge Plaintiffs to gather information and prepare documentation concerning the loss and damages caused by Syngenta. The Firm spent countless hours meeting with individual farmers in their homes, shops, out in the field, and at local diners and coffee shops across the State of Iowa. The Firm logged thousands of hours crisscrossing the state of Iowa to meet with its clients and prepare their cases for litigation. The Firm, over the course of the last four years, has visited nearly all 99 counties in Iowa in client meetings and consultations and driven thousands of miles. While we did not track all of our time because we were handling the cases on a contingency fee basis, the attached Time and Expense Statement represents a very small fraction of the actual time expended providing legal services and advice to the Hodge Plaintiffs. *See Exhibit B*. We will spend hundreds of additional hours going forward as we continue to prepare, document, and file claims on behalf of the Hodge Plaintiffs.

Each of the Hodge Plaintiffs identified at **Exhibit A** retained the Firm to represent them in this matter on a contingency fee basis. Pursuant to the Federal Rules of Civil Procedure §23(h), the Firm is entitled to compensation for its substantial time invested and risk involved in this complex case. There is no relevant court order on file and no case law directly on-point to provide guidance for this filing. The Firm submits this Application with supporting documents based solely on its own prediction of what the Courts might require under these circumstances. To that end, the Firm errs on the side of over-inclusion with this filing and offers as much detail as possible.

However, given the impressive number and volume of these Applications being filed on this date, the Firm will not reassert the same, repetitive arguments and authorities here. We submit this Application for Fees and Expenses for the purpose of requesting inclusion and compensation based on our individual fee agreements, and offering additional scope for the Court's analysis. As many others have already stated, it is crucial that we are able to assure our clients that they will not pay more in fees and expenses than absent and uninvolved class members. The Hodge Law Firm, PLLC, is also in agreement with other counsel in this matter, that a reasonable cap on the percentage of fees awarded, regardless of that established by our client agreements, is acceptable.

CONCLUSION

The Plaintiff's Counsel have requested that one-third of the common fund be allocated for attorney's fees, plus reimbursed expenses, and this position is well supported and argued by the many Applications for Fees and Expenses filed on this date. By whatever means the Court ultimately establishes reasonable and adequate compensation for the award of attorney's fees based on individual contingency agreements, the Hodge Law Firm, PLLC, on behalf of the firm and its local counsel, respectfully request the Court award them compensation on their contingency contracts, as well.

Dated: July 10, 2018

Respectfully Submitted,

By: _____
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ATTORNEYS FOR MOVANT

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, a true and correct copy of the foregoing was forwarded to counsel of record via the CM/ECF e-filing system and in accordance with the Federal Rules of Civil Procedure:

/s/ April L Rosenbaum
April L. Rosenbaum

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
S Hodge	12/18/2014	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	12/19/2014	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	12/20/2014	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	12/21/2014	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	12/22/2014	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	1/12/2015	Research news articles and other publications for any information related to Syngenta lawsuits	2.00	\$ 450.00	\$ 900.00
A Rosenbaum	1/12/2015	Research Iowa and Texas law regarding association with local counsel	3.00	\$ 450.00	\$ 1,350.00
A Rosenbaum	1/30/2015	Research corn production by county of client residency	2.00	\$ 450.00	\$ 900.00
A Rosenbaum	1/30/2015	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	2.00	\$ 450.00	\$ 900.00
Paralegal	2/2/2015	Set up meeting with David Adelman, Cornerstone, Des Moines, IA, regarding Syngenta Litigation	0.25	\$ 125.00	\$ 31.25
S Hodge	2/3/2015	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	2/4/2015	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	2/5/2015	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
S Hodge	2/6/2015	Travel to Des Moines, Iowa; meet and confer with multiple local legal, political, and technical experts	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	2/10/2015	Create client database and enter data collected to date	12.00	\$ 450.00	\$ 5,400.00
Paralegal	3/13/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	3/29/2015	Emails to/from local counsel regarding new client intake and potential for advertising (x9)	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	4/14/2015	Calls to local counsel, ag extension, academic experts, and personal contacts in Iowa	3.50	\$ 450.00	\$ 1,575.00

EXHIBIT "B"

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	4/17/2015	Conference with counsel re: strategy for filing suit	2.25	\$ 450.00	\$ 1,012.50
A Rosenbaum	4/27/2015	Create database of all Iowa contacts	3.75	\$ 450.00	\$ 1,687.50
A Rosenbaum	5/19/2015	Teleconference with marketing companies to determine most efficient means of disseminating information to clients and local counsel	1.00	\$ 450.00	\$ 450.00
Paralegal	5/20/2015	Review documents provided by Hanser & Associates	1.00	\$ 125.00	\$ 125.00
Paralegal	5/21/2015	Research hotels in the Iowa area. Book 2 flights, 2 hotels and car rental. – May 28 – 29, 2015. Discuss travel itinerary with attorneys (April & Shaun).	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	5/27/2015	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	5/27/2015	Receipt and review of NGFA and NAEGA Joint Statement related to Viptera and Duracade	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	5/27/2015	Track and review Facebook events created by lead MDL counsel	1.75	\$ 450.00	\$ 787.50
A Rosenbaum	5/27/2015	Draft Syngenta general power of attorney	2.00	\$ 450.00	\$ 900.00
S Hodge	5/28/2015	Travel to Des Moines, Sumner, Burlington, Iowa; meet and confer with local counsel	12.00	\$ 550.00	\$ 6,600.00
A Rosenbaum	5/28/2015	Travel to Des Moines, Sumner, Burlington, Iowa; meet and confer with local counsel	12.00	\$ 450.00	\$ 5,400.00
S Hodge	5/29/2015	Travel to E. Debuque, Iowa City, Des Moines, Iowa; meet and confer with local counsel	13.00	\$ 550.00	\$ 7,150.00
A Rosenbaum	5/29/2015	Travel to E. Debuque, Iowa City, Des Moines, Iowa; meet and confer with local counsel	13.00	\$ 450.00	\$ 5,850.00
Paralegal	6/1/2015	Review Syngenta Questionnaire; discuss information with attorney.	0.75	\$ 125.00	\$ 93.75
A Rosenbaum	6/1/2015	Modify Syngenta Litigation General Information Questionnaire	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	6/1/2015	Research news articles and other publications for any information related to Syngenta	3.00	\$ 450.00	\$ 1,350.00
Paralegal	6/2/2015	Prepare a Corn Case Binder; send binder via FedEx to Patrick B. Dillon, the Dillon Law PC.	2.00	\$ 125.00	\$ 250.00
Paralegal	6/4/2015	Attention to draft letter to clients with Syngenta Questionnaire.	0.25	\$ 125.00	\$ 31.25
A Rosenbaum	6/5/2015	Draft agreement for association with local counsel	1.50	\$ 450.00	\$ 675.00
Paralegal	6/17/2015	Check available flights to Iowa. Book 2 flights, 2 hotel rooms and car rental. – June 22-25, 2015. Discuss travel itinerary with attorneys (April & Shaun).	0.50	\$ 125.00	\$ 62.50

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
Paralegal	6/22/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	6/22/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	6/22/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
S Hodge	6/22/2015	Travel to Des Moines, Marshalltown, Iowa; meet and conver with local counsel and clients	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	6/22/2015	Travel to Des Moines, Marshalltown, Iowa; meet and conver with local counsel and clients	10.00	\$ 450.00	\$ 4,500.00
Paralegal	6/23/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
S Hodge	6/23/2015	Travel to Sumner, East Dubuque, Iowa; meet and conver with local counsel and clients	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	6/23/2015	Travel to Sumner, East Dubuque, Iowa; meet and conver with local counsel and clients	10.00	\$ 450.00	\$ 4,500.00
S Hodge	6/24/2015	Travel to Iowa City, Burlington, Iowa; meet and conver with local counsel and clients	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	6/24/2015	Travel to Iowa City, Burlington, Iowa; meet and conver with local counsel and clients	10.00	\$ 450.00	\$ 4,500.00
S Hodge	6/25/2015	Travel to Des Moines, Iowa; meet and conver with local counsel and clients	12.00	\$ 550.00	\$ 6,600.00
A Rosenbaum	6/25/2015	Travel to Des Moines, Iowa; meet and conver with local counsel and clients	12.00	\$ 450.00	\$ 5,400.00
Paralegal	6/29/2015	Reciept and review of G Craun client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	6/29/2015	Reciept and review of J Craun client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	6/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	6/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	6/30/2015	Revise Syngenta general power of attorney to reflect new local counsel associations	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	6/30/2015	Research corn yeild and production data from the USDA	2.50	\$ 450.00	\$ 1,125.00

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	6/30/2015	Create welcome material binders for 22 local counsel, to include sample client letters,	9.25	\$ 450.00	\$ 4,162.50
A Rosenbaum	7/7/2015	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	7/16/2015	Draft sample advertisement letter at request of local counsel	1.00	\$ 450.00	\$ 450.00
Paralegal	7/16/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	7/16/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	7/16/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	7/21/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	7/22/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	7/27/2015	Emails to/from local counsel regarding process for new client intake	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	7/28/2015	Receipt and review of executed agreement and related documents from local counsel	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	7/28/2015	Emails to/from local counsel regarding new client intake (x11)	1.25	\$ 450.00	\$ 562.50
A Rosenbaum	7/30/2015	Emails to/from local counsel regarding new client intake (x7)	0.75	\$ 450.00	\$ 337.50
Paralegal	7/30/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	7/31/2015	Confer with co-counsel regarding relationship with local counsel	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	8/3/2015	Emails to/from local counsel regarding new client intake (x3)	0.25	\$ 450.00	\$ 112.50
Paralegal	8/4/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	8/10/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/10/2015	Emails to/from local counsel regarding new client intake (x10)	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	8/10/2015	Research Iowa Bar Association rules regarding advertising; confer with co-counsel and local counsel	3.00	\$ 450.00	\$ 1,350.00
Paralegal	8/11/2015	Research hotels for 15 day stay. Book hotel for 1. August 20 – September 4, 2015. Discuss travel itinerary with attorney (April).	0.50	\$ 125.00	\$ 62.50
A Rosenbaum	8/11/2015	Emails to/from local counsel regarding new client intake (x5)	0.50	\$ 450.00	\$ 225.00

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Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
Paralegal	8/11/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/12/2015	Receipt and review of Discovery Order and Motion for Misc Relief in Kansas MDL; confer with co-counsel regarding same	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	8/12/2015	Emails to/from local counsel regarding new client intake (x2)	0.25	\$ 450.00	\$ 112.50
Paralegal	8/12/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/13/2015	Emails to/from local counsel regarding new client intake (x3)	0.25	\$ 450.00	\$ 112.50
Paralegal	8/13/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/14/2015	Travel to Des Moines, IA	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	8/17/2015	Meet and confer with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	8/18/2015	Meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	8/19/2015	Emails to/from local counsel regarding new client intake (x3)	0.25	\$ 450.00	\$ 112.50
Paralegal	8/19/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/19/2015	Meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
Paralegal	8/20/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/20/2015	Meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	8/21/2015	Emails to/from local counsel regarding new client intake (x7)	0.75	\$ 450.00	\$ 337.50
Paralegal	8/21/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/21/2015	Travel to Burlington, Dubuque, Iowa; meet and confer with local counsel and one-on-one with clients	12.00	\$ 450.00	\$ 5,400.00
A Rosenbaum	8/24/2015	Emails to/from local counsel regarding new client intake (x3)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	8/24/2015	Emails to/from attorney Hodge regarding coordination of one-on-one client meetings (x9)	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	8/24/2015	Meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	8/25/2015	Emails to/from local counsel regarding new client intake (x11)	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	8/25/2015	Meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	8/26/2015	Emails to/from local counsel regarding new client intake (x6)	0.50	\$ 450.00	\$ 225.00
Paralegal	8/26/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00

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Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
Paralegal	8/26/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/26/2015	Travel to Osage, IA; meet and confer with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	8/27/2015	Emails to/from local counsel regarding new client intake (x5)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	8/27/2015	Travel to Des Moines, IA; meet and confer with local counsel and one-on-one with clients	10.50	\$ 450.00	\$ 4,725.00
Paralegal	8/28/2015	Check available flights to Iowa for 1. Check hotel and car availability. September 2-5, 2015.	0.50	\$ 125.00	\$ 62.50
A Rosenbaum	8/28/2015	Emails to/from local counsel regarding new client intake (x10)	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	8/29/2015	Emails to/from local counsel regarding new client intake (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	9/2/2015	Emails to/from local counsel regarding new client intake (x3)	0.25	\$ 450.00	\$ 112.50
Paralegal	9/2/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	9/2/2015	Travel to Fargo, ND; meet and confer with local counsel; attend conference	15.00	\$ 450.00	\$ 6,750.00
S Hodge	9/2/2015	Travel to Des Moines ; meet and confer with local counsel and one-on-one with clients (3 days)	40.00	\$ 550.00	\$ 22,000.00
A Rosenbaum	9/3/2015	Review expert materials provided by lead MDL counsel	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/3/2015	Travel to Des Moines, IA; meet and confer with local counsel and one-on-one with clients	12.00	\$ 450.00	\$ 5,400.00
A Rosenbaum	9/4/2015	Travel to Sumner, IA; meet and confer with local counsel and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	9/5/2015	Return travel	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	9/9/2015	Emails to/from local counsel regarding new client intake (x7)	0.50	\$ 450.00	\$ 225.00
Paralegal	9/9/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	9/9/2015	Research case status, review materials available to the public, confer with other MDL counsel regarding strategy; review advertising materials	3.00	\$ 450.00	\$ 1,350.00
Paralegal	9/10/2015	Research hotels for 11 day stay. Book hotel for 1. September 15 – 26, 2015. Discuss travel itinerary with attorney (April).	0.50	\$ 125.00	\$ 62.50
Paralegal	9/10/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	9/10/2015	Emails to/from local counsel regarding new client intake (x16)	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/12/2015	Travel to Des Moines, Iowa, and Russelville, MO	16.00	\$ 450.00	\$ 7,200.00

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	9/13/2015	Travel to Dubuque, IA; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/14/2015	Confer with attorney Hodge re status and strategy of acquiring additional local counsel	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	9/14/2015	Draft Syngenta Claim Summary for dissemination to local counsel, clients and potential	1.00	\$ 450.00	\$ 450.00
Paralegal	9/14/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	9/14/2015	Emails to/from local counsel regarding new client intake (x12)	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/14/2015	Travel to Cedar Rapids, Iowa; meet one-on-one with clients	7.00	\$ 450.00	\$ 3,150.00
A Rosenbaum	9/15/2015	Conference call with the Kessler Group	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/15/2015	Travel to Centerville, Iowa; meet one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/16/2015	Travel to Indianola, Iowa; meet one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/17/2015	Emails to/from local counsel regarding new client intake (x4)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	9/17/2015	Receipt and review of materials provided by lead MDL counsel related to damages	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/17/2015	Travel to Red Oak, Iowa; meet one-on-one with clients (16 days)	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/18/2015	Emails to/from local counsel regarding expenses related to litigation (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	9/18/2015	Travel to Des Moines, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/21/2015	Emails to/from local counsel regarding new client intake and client maintenance (x8)	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	9/21/2015	Receipt and review of advertising material approved by the Iowa Bar Association; confer	2.00	\$ 450.00	\$ 900.00
A Rosenbaum	9/21/2015	Travel to Burlington, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/22/2015	Draft sample client contact letter at request of local counsel	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/22/2015	Emails to/from local counsel regarding new client intake and client maintenance (x15)	1.25	\$ 450.00	\$ 562.50
Paralegal	9/22/2015	Review and organize Syngenta information; send information to Tomas Stamets, Stamets & Wearin, PC.	2.00	\$ 125.00	\$ 250.00
A Rosenbaum	9/22/2015	Travel to Iowa City, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/23/2015	Emails to/from local counsel regarding new client intake and client maintenance (x7)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	9/23/2015	Confer with attorney Hodge re status and strategy of managing client data	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	9/23/2015	Travel to Sumner and Des Moines, Iowa; meet with local counsel and one-on-one with	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/24/2015	Email from local counsel regarding new client intake	0.25	\$ 450.00	\$ 112.50

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	9/24/2015	Travel to Osage, Iowa; meet one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/25/2015	Travel to Des Moines, IA; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	9/26/2015	Return travel	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	9/29/2015	Research case filings in Kansas MDL and class action matter; dowload and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	9/30/2015	Email from local counsel regarding new client intake	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/1/2015	Emails to/from local counsel regarding new client intake and client maintenance (x7)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	10/1/2015	Draft notice of release of legal counsel at request of local counsel	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	10/5/2015	Emails to/from local counsel regarding new client intake and client maintenance (x8)	0.75	\$ 450.00	\$ 337.50
Paralegal	10/5/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/5/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/5/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	10/6/2015	Emails to/from local counsel regarding new client intake and client maintenance (x7)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	10/7/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50
Paralegal	10/7/2015	Book hotel for 11 day stay. October 12-23, 2015 (April)	0.50	\$ 125.00	\$ 62.50
Paralegal	10/8/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/8/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/8/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	10/8/2015	Emails to/from local counsel regarding new client intake and client maintenance (x15)	1.25	\$ 450.00	\$ 562.50
A Rosenbaum	10/8/2015	Create powerpoint presentation for scheduled client meetings	3.50	\$ 450.00	\$ 1,575.00

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Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	10/9/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/11/2015	Travel to Kearney, MO, and Des Moines, IA, to meet with local counsel and one-on-one	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	10/12/2015	Reciept and review correspondence from local counsel regarding concerns and questions of	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/12/2015	Meet with local counsel and one-on-one with clients in Des Moines, IA	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/13/2015	Receipt and review of proposed client correspondence from local counsel	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/13/2015	Travel to Davenport, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/14/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/14/2015	Travel to Burlington, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/15/2015	Meet with local counsel and one-on-one with clients in Burlington area	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	10/16/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/16/2015	Travel to Rock Island, Iowa; meet one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/19/2015	Travel to Dubuque, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/20/2015	Emails to/from local counsel regarding new client intake and client maintenance (x3)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/20/2015	Meet with local counsel and one-on-one with clients in Dubuque area	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	10/21/2015	Emails to/from local counsel regarding new client intake and client maintenance (x7)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	10/21/2015	Travel to Peosta, Iowa; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/22/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/22/2015	Travel to Masoqueta, IA; meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	10/23/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/23/2015	Return travel	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	10/26/2015	Emails to/from local counsel regarding new client intake and client maintenance (x3)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/27/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/27/2015	Conference call with local counsel regarding correspondence with our existing clients by other plaintiff's counsel	0.50	\$ 450.00	\$ 225.00

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Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	10/28/2015	Receipt and review of client documents submitted by local counsel	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	10/29/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
Paralegal	10/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	10/29/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	10/30/2015	Receipt and review of indicment of MDL attorney Watts	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	10/30/2015	Confer with attorney Hodge regarding status of remands, tolling of SOL, scheduled trial in Kansas MDL, strategy for calculating damages, Iowa impact taxes, and other case status and	0.50	\$ 450.00	\$ 225.00
S Hodge	10/30/2015	Meet with attorney Rosenbaum regarding status and strategy for litigation	0.50	\$ 550.00	\$ 275.00
A Rosenbaum	10/30/2015	Emails to/from local counsel regarding new client intake and client maintenance (x6)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	11/2/2015	Email from local counsel regarding new client intake	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	11/3/2015	Receipt and review of local newspaper articles concerning Syngenta litigation; confer with attorney Hodge regarding same	0.50	\$ 450.00	\$ 225.00
S Hodge	11/3/2015	Confer with counsel regarding negative press in Iowa	0.50	\$ 550.00	\$ 275.00
A Rosenbaum	11/4/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
Paralegal	11/4/2015	Reciept and review of Busta client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	11/5/2015	Email from local counsel regarding new client intake	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	11/6/2015	Emails to/from local counsel regarding new client intake and client maintenance (x6)	0.50	\$ 450.00	\$ 225.00
Paralegal	11/6/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/6/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00

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Attorney	Date	Description	Hours	Rate	Amount
Paralegal	11/6/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
Paralegal	11/6/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/8/2015	Book multiple hotel stays (Iowa, Kansas City & Oklahoma).	0.50	\$ 125.00	\$ 62.50
A Rosenbaum	11/8/2015	Confer with local counsel regarding potential Syngenta acquisition by DuPont or Dow	0.50	\$ 450.00	\$ 225.00
S Hodge	11/8/2015	Conference with lcoal counsel regarding Syngenta status	0.50	\$ 550.00	\$ 275.00
A Rosenbaum	11/8/2015	Travel to Kansas City and Des Moines, Iowa, to meet with local counsel and one-on-one	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	11/9/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	11/9/2015	Travel to Burlington, Iowa; Meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/10/2015	Travel to Dubuque, Iowa; Meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/11/2015	Emails to/from local counsel regarding new client intake and client maintenance (x10)	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	11/11/2015	Draft revised update letter to clients with new status of case; confer with local counsel re same; assist preparation of mass mailer to clients	5.50	\$ 450.00	\$ 2,475.00
A Rosenbaum	11/11/2015	Travel to Ames, Iowa; Meet one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/12/2015	Emails to/from local counsel regarding new client intake and client maintenance (x5)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	11/12/2015	Continue preaparation of mass mailer client update	3.00	\$ 450.00	\$ 1,350.00
A Rosenbaum	11/12/2015	Travel to Iowa City and Mason City, Iowa; Meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/13/2015	Emails to/from local counsel regarding new client intake and client maintenance (x8)	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	11/13/2015	Research and review case status, review articles and other materials availalbe to the public that clients may question, confer with co-counsel and local counsel regarding on-going	2.75	\$ 450.00	\$ 1,237.50
A Rosenbaum	11/13/2015	Travel to Ft Dodge, Iowa; Meet one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
Paralegal	11/15/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/16/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00

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Attorney	Date	Description	Hours	Rate	Amount
Paralegal	11/16/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	11/16/2015	Emails to/from local counsel regarding new client intake and client maintenance (x12)	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	11/17/2015	Email from local counsel regarding new client intake	0.25	\$ 450.00	\$ 112.50
Paralegal	11/17/2015	Reciept and review of Anderson client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/17/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/17/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/17/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/17/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	11/18/2015	Emails to/from local counsel regarding new client intake and client maintenance (x4)	0.25	\$ 450.00	\$ 112.50
Paralegal	11/18/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	11/18/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	11/19/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50
A Rosenbaum	11/20/2015	Receipt and review of Syngenta third party claims against Cargill and ADM; confer with attorney Hodge re same	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	11/20/2015	Confer with local counsel regarding status of case and Syngenta third party claims, discuss how may impact local farmers	0.50	\$ 450.00	\$ 225.00
S Hodge	11/20/2015	Review and analyze Syngenta counterclaims against grain-traders; confer with counsel	0.50	\$ 550.00	\$ 275.00
A Rosenbaum	11/24/2015	Receipt and review of local counsel correspondence regarding damages related to ethanol byproducts and potentail claims; confer re same	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	11/25/2015	Emails to/from local counsel regarding new client intake and client maintenance (x2)	0.25	\$ 450.00	\$ 112.50

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Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	12/3/2015	Emails to/from local counsel regarding new client intake and client maintenance (x3)	0.25	\$ 450.00	\$ 112.50
Paralegal	12/3/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/9/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/9/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/9/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/10/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/10/2015	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	12/15/2015	Reciept and review of D Baker client agreement, questionnaire, and supporting documents;	1.00	\$ 125.00	\$ 125.00
Paralegal	12/22/2015	Review and revise Syngenta AG MIR 162 Litigation Welcome letter. Mail out welcome	8.00	\$ 125.00	\$ 1,000.00
Paralegal	12/23/2015	Continue mail out of welcome letters.	4.75	\$ 125.00	\$ 593.75
A Rosenbaum	2/15/2016	Download and review World of Corn annual publication, 2013-2015	1.75	\$ 450.00	\$ 787.50
A Rosenbaum	2/29/2016	Travel to Fayetteville, AR, to meet with local counsel	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	3/1/2016	Meet with local counsel; travel to Jonesboro, AR	7.00	\$ 450.00	\$ 3,150.00
A Rosenbaum	3/2/2016	Meet with local counsel; travel to Nashville, TN	7.00	\$ 450.00	\$ 3,150.00
A Rosenbaum	3/3/2016	Travel to Mt. Juliet and Athens, TN, and Lexington, KY; meet with local counsel	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	3/4/2016	Meet with local counsel; travel to Columbus, OH	5.50	\$ 450.00	\$ 2,475.00
A Rosenbaum	3/7/2016	Meet with local counsel; travel to Delaware and Cleveland, OH; meet with local counsel	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	3/8/2016	Travel to Westlake and Ottawa, OH; meet with local counsel; travel to Hudson and	10.50	\$ 450.00	\$ 4,725.00
A Rosenbaum	3/9/2016	Meet with local counsel; travel to Noblesville and Crawfordsville, IN; meet with local	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	3/10/2016	Meet with local counsel; travel to Memphis, TN	8.50	\$ 450.00	\$ 3,825.00

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Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	3/11/2016	Return travel	13.00	\$ 450.00	\$ 5,850.00
Paralegal	3/15/2016	Research hotels in Ohio. Book hotel and discuss travel itinerary with attorney (April).	0.50	\$ 125.00	\$ 62.50
A Rosenbaum	6/9/2016	Research Northern District of Iowa case, review docket, download and review Plaintiffs' Original Complaint; research Southern District of Iowa case, review docket, download and	7.25	\$ 450.00	\$ 3,262.50
A Rosenbaum	10/19/2016	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	11/28/2016	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	1/3/2017	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	1/23/2017	Research case filings in Kansas MDL and class action matter; download and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	1/26/2017	Draft correspondence to all clients regarding the opt out process, what it means and what is required, conveying instructions and forms, copying local counsel	5.00	\$ 450.00	\$ 2,250.00
Paralegal	1/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	1/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	1/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
Paralegal	1/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	1/27/2017	Draft opt out instructions and revise form	2.00	\$ 450.00	\$ 900.00
Paralegal	1/27/2017	Mass Mail Out to clients regarding Opt Out.	8.00	\$ 125.00	\$ 1,000.00
Paralegal	1/28/2017	Continue Mass Mail Out to clients regarding Opt Out.	6.50	\$ 125.00	\$ 812.50
A Rosenbaum	1/30/2017	Continue preparation and assist with mass mailing of client correspondence related to the opt-out process	5.25	\$ 450.00	\$ 2,362.50

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Attorney	Date	Description	Hours	Rate	Amount
Paralegal	2/7/2017	Reciept and review of K Baker client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/7/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/7/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/7/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/7/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/13/2017	Reciept and review of E Baker client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/13/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/14/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/14/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/14/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/15/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/15/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	2/16/2017	Prepare additional files for Opt-out forms (signed, sent) along with files for pleadings and correspondence. Organize for attorney review.	2.75	\$ 125.00	\$ 343.75
A Rosenbaum	2/18/2017	Research case filings in Kansas MDL and class action matter; dowload and review relevant pleadings	1.50	\$ 450.00	\$ 675.00
Paralegal	3/2/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/2/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00

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Attorney	Date	Description	Hours	Rate	Amount
Paralegal	3/8/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/15/2017	Research available hotels for 4 night stay for 2. February 29 – March 14, 2016. Book Hotel, flights and car rental. Discuss travel itinerary with attorneys (April & Shaun).	0.50	\$ 125.00	\$ 62.50
A Rosenbaum	3/15/2017	Draft follow-up correspondence to clients regarding opt-out process; assist with preparation of mass mail to clients	3.00	\$ 450.00	\$ 1,350.00
Paralegal	3/15/2017	Review list of clients who need FedEx letters w/ Priority mail return envelopes. Discuss list with attorney. Confirm addresses. Mas Mail Out 28 FedEx and 28 Priority Mail with return	7.00	\$ 125.00	\$ 875.00
S Hodge	3/20/2017	Travel to Cedar Falls, Iowa, to meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process	10.00	\$ 550.00	\$ 5,500.00
A Rosenbaum	3/20/2017	Travel to Cedar Falls, Iowa, to meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process	10.00	\$ 450.00	\$ 4,500.00
Paralegal	3/21/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/21/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/21/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/21/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
S Hodge	3/21/2017	Travel to Waverly, Tripoli, Sumner, Oelwein, Arlington, Cedar Falls, Iowa; meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process	10.50	\$ 550.00	\$ 5,775.00
A Rosenbaum	3/21/2017	Travel to Waverly, Tripoli, Sumner, Oelwein, Arlington, Cedar Falls, Iowa; meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process	10.50	\$ 450.00	\$ 4,725.00
Paralegal	3/22/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/22/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00

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Attorney	Date	Description	Hours	Rate	Amount
Paralegal	3/22/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
S Hodge	3/22/2017	Travel to Waterloo, Dunkerton, Aurora, Stanley, Greeley, Manchester, Dyersville, LaMotte, Clinton, Wheatland, Davenport, Iowa; meet with clients one-on-one, discuss litigation,	11.50	\$ 550.00	\$ 6,325.00
A Rosenbaum	3/22/2017	Travel to Waterloo, Dunkerton, Aurora, Stanley, Greeley, Manchester, Dyersville, LaMotte, Clinton, Wheatland, Davenport, Iowa; meet with clients one-on-one, discuss litigation,	11.50	\$ 450.00	\$ 5,175.00
S Hodge	3/23/2017	Travel to Wever, Burlington, and Cedar Rapids, Iowa; meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process; return travel	16.00	\$ 550.00	\$ 8,800.00
A Rosenbaum	3/23/2017	Travel to Wever, Burlington, and Cedar Rapids, Iowa; meet with clients one-on-one, discuss litigation, provide update, and explain opt-out process; return travel	16.00	\$ 450.00	\$ 7,200.00
Paralegal	3/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to system, create client file and update database	1.00	\$ 125.00	\$ 125.00
Paralegal	3/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
Paralegal	3/27/2017	Reciept and review of client agreement, questionnaire, and supporting documents; scan to	1.00	\$ 125.00	\$ 125.00
Paralegal	3/29/2017	Attention to return envelope with opt out for Michael P. Maher.	0.25	\$ 125.00	\$ 31.25
Paralegal	3/29/2017	Attention to return envelope from Cray Law Firm with Opt Out.	0.25	\$ 125.00	\$ 31.25
Paralegal	3/29/2017	Attention to return envelope from Steven & Deneen Mills with Opt Out.	0.25	\$ 125.00	\$ 31.25
Paralegal	3/30/2017	Review and organize multiple Opt Outs for filing with court. Scan and save to file. Review how court will accept Opt Outs. Prepare priority mail envelope for filing to Syngenta AG	4.50	\$ 125.00	\$ 562.50
A Rosenbaum	3/30/2017	Receipt and review all opt-out forms for sufficiency and update client database accordingly	6.50	\$ 450.00	\$ 2,925.00
Paralegal	4/1/2017	Send additional opt outs for filing to Syngenta AG MIR 162 Corn Litigation, c/o Analytics LLC, P.O. Box 2007, Chanhassen, MN 55317-2017.	1.50	\$ 125.00	\$ 187.50
A Rosenbaum	5/9/2017	Research case filings in Kansas MDL and class action matter; dowload and review relevant	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	7/26/2017	Research case filings in Kansas MDL and class action matter; dowload and review relevant pleadings	1.50	\$ 450.00	\$ 675.00

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
Paralegal	8/16/2017	Research PACER for case information. Organize for attorney review.	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	8/17/2017	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	9/14/2017	Receipt and review of Memorandum and Order on Motion to Dismiss; confer with co-counsel re same	1.00	\$ 450.00	\$ 450.00
A Rosenbaum	9/15/2017	Emails to/from local counsel regarding new client intake (x6)	0.50	\$ 450.00	\$ 225.00
A Rosenbaum	9/15/2017	Receipt and review of local counsel research related to ethics and class action lawsuits in Iowa; confer with attorney Hodge re same	0.75	\$ 450.00	\$ 337.50
A Rosenbaum	11/16/2017	Travel to Council Bluffs, Iowa; Meet one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	11/17/2017	Travel to Sioux City, Iowa; Meet and one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	11/18/2017	Travel to Cedar Rapids, Iowa; Meet one-on-one with clients	8.00	\$ 450.00	\$ 3,600.00
A Rosenbaum	11/19/2017	Travel to Maquoketa and Davenport, Iowa; Meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/20/2017	Travel to Des Moines, Iowa, to meet with local counsel and one-on-one with clients	10.00	\$ 450.00	\$ 4,500.00
A Rosenbaum	11/21/2017	Return travel	16.00	\$ 450.00	\$ 7,200.00
A Rosenbaum	1/10/2018	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
Paralegal	1/30/2018	Review Order Regarding Settlement Status Report. Discuss with attorney.	1.00	\$ 125.00	\$ 125.00
A Rosenbaum	1/30/2018	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
A Rosenbaum	3/13/2018	Receipt and review of Memorandum of Law in Support of Settlement and exhibits; confer with co-counsel; update local counsel	5.00	\$ 450.00	\$ 2,250.00
A Rosenbaum	4/24/2018	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
Paralegal	5/22/2018	Mass Mailer – Settlement update letter	8.00	\$ 125.00	\$ 1,000.00
Paralegal	5/23/2018	Continue Mass Mailer – Settlement update letter	2.00	\$ 125.00	\$ 250.00
A Rosenbaum	7/9/2018	Research case filings in Kansas MDL and class action matter; download and review relevant	1.50	\$ 450.00	\$ 675.00
TOTAL:			1,316.75		\$ 565,887.50

Attorney	Date	Description	Amount
S Hodge	2/3/2015	Round trip air fair to Des Moines, Iowa	\$ 1,932.40
S Hodge	2/3/2015	Vehicle rental in Des Moines, Iowa (2 days)	\$ 43.83
S Hodge	5/28/2015	Round trip air fair to Des Moines, Iowa	\$ 584.19
S Hodge	5/28/2015	Lodging in Des Moines, Iowa (2 days)	\$ 1,168.38

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
S Hodge	5/28/2015	Vehicle rental in Des Moines, Iowa (2 days)		\$	59.25
A Rosenbaum	5/28/2015	Round trip air fare to Des Moines, Iowa		\$	1,150.40
A Rosenbaum	5/28/2015	Lodging in Des Moines, Iowa (2 days)		\$	170.25
A Rosenbaum	6/2/2015	FedEx charges for material transmitted to local counsel		\$	23.64
S Hodge	6/22/2015	Round trip air fare to and lodging in Des Moines, IA (4 days)		\$	1,718.78
A Rosenbaum	6/22/2015	Round trip air fare to and lodging in Des Moines, IA (4 days)		\$	1,718.78
A Rosenbaum	8/14/2015	Lodging in Des Moines, Iowa		\$	1,883.19
A Rosenbaum	8/14/2015	Meals while travelling (23 days)		\$	377.25
A Rosenbaum	8/14/2015	Mileage for travel to Des Moines, Burlington, Dubuque, Sumner, IA, and Fargo, ND		\$	2,490.97
A Rosenbaum	8/14/2015	Tolls		\$	32.70
A Rosenbaum	9/2/2015	Lodging in Fargo N Dakota		\$	142.55
S Hodge	9/2/2015	Lodging in Des Moines, Iowa		\$	635.04
Local Counsel	9/8/2015	2015 Agricultural Parcel Report		\$	50.00
Local Counsel	9/9/2015	Postage for 100 letters to clients and potential clients in Burlington, IA, area		\$	49.00
A Rosenbaum	9/10/2015	Lodging in Des Moines, Iowa (11 days)		\$	1,958.88
Local Counsel	9/10/2015	Van Buren County Agricultural Land Report		\$	60.00
Local Counsel	9/10/2015	Advertising - Facebook		\$	14.00
Local Counsel	9/10/2015	Postage for 109 letters sent to clients and potential clients in Van Buren County		\$	53.41
Local Counsel	9/11/2015	Henry County Report of Agricultural Land		\$	25.00
Local Counsel	9/11/2015	Lee County Report of Ag Parcel Landowners		\$	30.00
Local Counsel	9/11/2015	Postage for 71 letters sent to clients and potential clients in Henry and Lee Counties		\$	34.79
A Rosenbaum	9/12/2015	Mileage for travel to Des Moines, Dubuque, Cedar Rapids, Centerville, Indianola, Red Oak, Osage, Iowa, and Russellville, MO		\$	2,064.29
A Rosenbaum	9/12/2015	Meals while travelling (16 days)		\$	618.92
A Rosenbaum	9/12/2015	Meals with co-counsel and/or clients		\$	445.24
A Rosenbaum	9/12/2015	Tolls		\$	26.95
Local Counsel	9/15/2015	Agricultural Land Report for Louisa County		\$	69.70
Local Counsel	9/16/2015	Postage for 105 letters sent to clients and potential clients in Louisa County		\$	51.45
Local Counsel	9/17/2015	Postage for 100 letters sent to clients and potential clients		\$	49.00
Local Counsel	9/18/2015	Postage for 310 letters sent to clients and potential clients		\$	151.90
Local Counsel	9/21/2015	Postage for 300 letters sent to clients and potential clients		\$	147.00
Local Counsel	9/22/2015	Postage for 200 letters sent to clients and potential clients		\$	98.00
A Rosenbaum	9/22/2015	FedEx charges for material transmitted to local counsel		\$	34.37

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
Local Counsel	9/23/2015	Postage for 300 letters sent to clients and potential clients		\$	147.00
Local Counsel	9/24/2015	Postage for 200 letters sent to clients and potential clients		\$	98.00
Local Counsel	9/25/2015	Postage for 200 letters sent to clients and potential clients		\$	98.00
Local Counsel	10/5/2015	Postage for 100 letters sent to clients and potential clients		\$	49.00
Local Counsel	10/6/2015	Postage for 200 letters sent to clients and potential clients		\$	98.00
A Rosenbaum	10/7/2015	Lodging in Davinport, IA (4 days)		\$	722.40
Local Counsel	10/9/2015	Advertising - Louisa County Publishing		\$	3,000.00
A Rosenbaum	10/11/2015	Mileage for travel to Davenport, Burlington, Rock Island, E. Dubuque, Peosta, Masoqueta, Iowa, and Kearney, MO		\$	2,028.60
A Rosenbaum	10/11/2015	Meals for travel to Davenport, Burlington, Rock Island, E. Dubuque, Peosta, Masoqueta, Iowa, and Kearney, MO (13 days)		\$	533.51
A Rosenbaum	10/11/2015	Tolls for travel to Davenport, Burlington, Rock Island, E. Dubuque, Peosta, Masoqueta, Iowa, and Kearney, MO		\$	24.00
A Rosenbaum	10/12/2015	Lodging in Kearney, MO (1 day)		\$	82.41
A Rosenbaum	10/13/2015	Lodging in Dubuque, IA (10 days)		\$	1,205.90
A Rosenbaum	10/23/2015	Lodging in Davinport, IA (1 day)		\$	127.86
A Rosenbaum	11/8/2015	Mileage for travel to Des Moines, Burlington, Dubuque, Ames, Iowa City, Mason City, Ft Dodge, Council Bluffs, Maquoketa and Davenport, Iowa		\$	2,847.40
A Rosenbaum	11/8/2015	Meals during travel to Des Moines, Burlington, Dubuque, Ames, Iowa City, Mason City, Ft Dodge, Council Bluffs, Maquoketa and Davenport, Iowa		\$	497.06
A Rosenbaum	11/8/2015	Tolls during travel to Des Moines, Burlington, Dubuque, Ames, Iowa City, Mason City, Ft Dodge, Council Bluffs, Maquoketa and Davenport, Iowa		\$	31.75
A Rosenbaum	11/9/2015	Lodging in Kansas City, MO		\$	147.80
A Rosenbaum	2/29/2016	Mileage for travel to Fayetteville, AR, Jonesboro, AR, Nashville, TN, Juliet, TN, Athens, TN, Lexington, KY, Columbus, OH, Delaware, OH, Cleveland, OH, Westlake, OH, Ottawa, OH, Hudson, IN, Indianapolis, IN, Noblesville, IN, Crawfordsville, IN, and Champaign, IL; meet with local counsel		\$	2,438.58
A Rosenbaum	2/29/2016	Tolls for travel to Fayetteville, AR, Jonesboro, AR, Nashville, TN, Juliet, TN, Athens, TN, Lexington, KY, Columbus, OH, Delaware, OH, Cleveland, OH, Westlake, OH, Ottawa, OH, Hudson, IN, Indianapolis, IN, Noblesville, IN, Crawfordsville, IN, and Champaign, IL; meet with local counsel		\$	48.00

The Hodge Law Firm

Time and Expense Statement

Attorney	Date	Description	Hours	Rate	Amount
A Rosenbaum	2/29/2016	Meals during travel to Fayetteville, AR, Jonesboro, AR, Nashville, TN, Juliet, TN, Athens, TN, Lexington, KY, Columbus, OH, Delaware, OH, Cleveland, OH, Westlake, OH, Ottawa, OH, Hudson, IN, Indianapolis, IN, Noblesville, IN, Crawfordsville, IN, and Champaign, IL; meet with local counsel			\$ 476.41
A Rosenbaum	2/29/2016	Lodging in Fayetteville, AR			\$ 134.77
A Rosenbaum	3/1/2016	Lodging in Jonesboro, AR			\$ 160.66
A Rosenbaum	3/2/2016	Lodging in Nashville, TN			\$ 314.49
A Rosenbaum	3/3/2016	Lodging in Lexington, KY			\$ 824.25
A Rosenbaum	3/8/2016	Lodging in Nashville, TN			\$ 430.72
A Rosenbaum	3/10/2016	Lodging in Columbus, OH			\$ 563.88
Local Counsel	7/8/2016	Advertising - Craftsman Press			\$ 347.75
S Hodge	1/27/2017	Postage for client update letters			\$ 351.49
A Rosenbaum	3/15/2017	Meals during travel to Cedar Falls, Waverly, Tripoli, Sumner, Oelwein, Arlington, Cedar Falls, Waterloo, Dunkerton, Aurora, Stanley, Greeley, Manchester, Dyersville, LaMotte, Clinton, Wheatland, Davenport, Wever, Burlington, Cedar Rapids, and Des Moines, Iowa (4 days)			\$ 53.67
S Hodge	3/15/2017	FedEx charges for client correspondence describing opt-out process			\$ 192.85
S Hodge	3/20/2017	Round trip air fare to Cedar Rapids, IA			\$ 1,031.49
S Hodge	3/20/2017	Vehicle rental for travel to Cedar Falls, Waverly, Tripoli, Sumner, Oelwein, Arlington, Cedar Falls, Waterloo, Dunkerton, Aurora, Stanley, Greeley, Manchester, Dyersville, LaMotte, Clinton, Wheatland, Davenport, Wever, Burlington, Cedar Rapids, and Des Moines, Iowa (4 days)			\$ 362.10
S Hodge	3/20/2017	Lodging in Cedar Falls, Iowa			\$ 322.56
A Rosenbaum	3/20/2017	Round trip air fare to Cedar Rapids, IA			\$ 963.62
A Rosenbaum	3/20/2017	Lodging in Cedar Falls, Iowa			\$ 322.56
S Hodge	3/29/2017	FedEx charges for client correspondence describing opt-out process			\$ 179.35
S Hodge	3/30/2017	Priority Mail charges for submitting opt-out forms to the Court			\$ 90.65
A Rosenbaum	8/11/2017	Lodging in Des Moines, Iowa			\$ 2,167.20
S Hodge	8/16/2017	Pacer fee			\$ 42.50
S Hodge	9/2/2017	Round trip air fair to Des Moines, Iowa			\$ 1,128.20
A Rosenbaum	11/10/2017	Lodging in Des Moines, Iowa			\$ 1,655.27
A Rosenbaum	11/18/2017	Lodging in Kansas City, MO			\$ 154.66
A Rosenbaum	11/19/2017	Lodging in Oklahoma City, OK			\$ 238.00
TOTAL:					\$ 46,897.87

**IN THE UNITED STATES DISTRICT COURT
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. 15-22479

MDL No. 2591

Case No. 14-MD-02591-JWL-JPO

**DECLARATION OF SHAUN HODGE FOR THE HODGE LAW FIRM, PLLC, IN
FURTHER SUPPORT OF THE HODGE LAW FIRM'S APPLICATION FOR FEES
AND EXPENSES**

I, Shaun W. Hodge, declare as follows:

1. I am over the age of 21 and make this declaration based on personal knowledge. If called as a witness, I will testify as to the facts outlined here, which are true, complete, and correct.
2. I am the founder and Managing Director of The Hodge Law Firm, PLLC, (“the Firm”) and am authorized to submit this declaration on the Firm’s behalf.
3. I submit this declaration in support of the Firm’s Application for Fees and Expenses, filed as required by Paragraph 7.2.1 of the Agrisure Viptera/Duracade Class Settlement Agreement pending final approval in the above-captioned case.

4. The Firm represents 83 producer Plaintiffs jointly with local counsel in Iowa. (*See Exhibit A.*) Each Firm client retained our services by written agreement on a contingency fee basis of 34% of recovery, plus advanced expenses. The Firm agreed to compensation only if our clients achieved a recovery.

5. Because the Firm's representation was on a contingency basis, we did not track the time spent on this matter. We have attempted to recreate our hourly billing via e-mails, telephone logs, client files, and attorney notes. Using this conservative estimation, the Firm has invested 1,316.75 hours in this case for a total of \$565,887.50 at our usual and customary hourly rates and has incurred \$46,897.87 in expenses to date. (*See Exhibit B.*)

6. The individuals in the Firm who worked on this matter include: myself, April L. Rosenbaum, paralegals, and multiple local counsel in Iowa. I was admitted to the Texas bar in 2008 and I have over 10 years' of experience, including significant mass tort litigation expertise. I am also admitted to all Texas Federal Courts, the United States Federal Claims Court, and the United States Supreme Court. My CV is attached at **Exhibit D**. Attorney Rosenbaum was admitted to the Texas bar in 2011, is admitted to all four Texas Federal District Courts, and she has over 14 years of litigation experience. Ms. Rosenbaum has also been admitted to the Missouri and Kansas bars, as well as various other Federal Courts.

7. In December 2014, our Firm first learned of the potential for claims against Syngenta through my farming associates and contacts in Iowa. Shortly thereafter I met with the Iowa Bar Association and various local attorneys to discuss the validity of the claims against Syngenta and the likelihood of a successful lawsuit. After researching and analyzing the case, our Firm began developing relationships with local counsel and accepting clients.

8. Since 2015, the Firm has spent hundreds of hours meeting with farmers and local counsel one-on-one in Iowa, obtaining the documentation required by the Court to support our client's claims, monitoring and researching the bell-weather and class action cases, and, now, monitoring the settlement progression and collecting materials required as the Court developed its orders, as well as our ongoing and concerted efforts to develop and maintain significant relationships with our clients by meeting individually and often and consistently updating those client's that preferred detailed information while offering basic factual updates to those who prefer to only be bothered with critical material. Attorney Rosenbaum and I, along with multiple local counsel, frequently meet with clients one-on-one and kept them otherwise informed via email, phone calls, and group meetings.

9. The Firm believes the present Settlement Agreement is reasonable and in the best interests of our clients. We have recommended that our clients participate and expect to file completed and timely claim forms for each and every client. Despite any class status, our Firm continues to diligently represent the interests of our clients and will continue to do so until all disbursements are made and our clients have achieved the best possible resolution of their claims.

I declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing declaration is true and correct to the best of my knowledge.

Dated: July 10, 2018.



Shaun W. Hodge

SHAUN WESLEY HODGE

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Galveston, Texas 77550
Phone (409) 762-5000
Fax (409) 763-2300

EDUCATION

Thurgood Marshall School of Law, Texas Southern University
Doctorate of Jurisprudence 2008, *Cum Laude*

University of Houston – Clear Lake, Houston, Texas
Bachelor of Science, Financial Administration, December 2004

EXPERIENCE

Hodge Law Firm, PLLC, Galveston, Texas
Founder and Managing Director of Hodge Law Firm, PLLC 2010-Present
Licensed to Practice Law 2008

BAR ADMISSIONS

State Bar of Texas
United States Supreme Court
United States Southern District of Texas
United States Northern District of Texas
United State Western District of Texas
United State Eastern District of Texas
United States Court of Federal Claims

PROFESSIONAL ASSOCIATIONS

Texas Bar Association
American Bar Association
Texas Trial Lawyers Association
American Association for Justice

EXHIBIT "D"

INSURANCE LITIGATION EXPERIENCE

IKE RELATED GOVERNMENTAL ENTITIES:

Below are the larger, more complex, multiple property Ike-related governmental entity cases, include but not limited to:

- 1) Lead attorney for City of Dickinson against TWIA
- 2) Lead attorney for City of La Marque against TWIA
- 3) Lead attorney for City of Santa Fe against TWIA
- 4) Lead attorney for College of the Mainland against TWIA
- 5) Lead attorney Dickinson ISD against TWIA
- 6) Lead attorney Texas City ISD against TWIA
- 7) Lead attorney Santa Fe ISD against TWIA
- 8) Lead attorney Anahuac ISD against TWIA
- 9) Lead attorney La Marque ISD against TWIA
- 10) Lead attorney Chambers County against TWIA
- 11) Co-Counsel Galveston County against TWIA

IKE RELATED NON-GOVERNMENTAL ENTITIES:

Personally handled well-over 350 Ike related residential and large commercial property claims, focusing on providing personal attention to each client.

BASTROP FIRE CASES:

Personally handling in excess of 50 cases related to the Bastrop and Possum Kingdom Texas wildfires of 2011.

CASE EXPERIENCE

I have personally handled hundreds and hundreds of first party insurance claims against the following carriers: (including but not limited to fire, wind, hail, hurricane, flood and tornados)

Allstate Insurance	* National Fire & Marine	*Truck Insurance Exchange
Continental Casualty Insurance	* State Farm Lloyds	*Fire Insurance Exchange
CNA Insurance	* Texas Windstorm Insurance TWIA	*American Security Insurance
Essex Insurance	* Hartford Insurance Company	*Hochheim Prairie
Fidelity National Property Insurance	* Standard Fire Insurance Company	* Mercury Insurance
Landmark American Insurance	* Voyager Indemnity Insurance Co.	* Texas Farm Bureau
Lantana Insurance Ltd.	* Germania Insurance	* Farmers Insurance
Lexington Insurance	* Nationwide Insurance	* Progressive Insurance
Lloyds of London	* Travelers Lloyds	* Esurance
USAA Insurance		