

**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

**JOHNSON BECKER'S MOTION FOR AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

Pursuant to the Court's April 10, 2018 Order Preliminarily Approving Settlement, and the applicable Federal Rules of Civil Procedure, the law firm of Johnson Becker, PLLC, respectfully asks this Court to award it attorneys' fees from the settlement fund in the amount of \$8,000,000.00, and an additional \$138,130.94 for costs that were incurred to advance this litigation, for a total of \$8,138,130.94. Johnson Becker's request is based on the fee award that the Firm reasonably anticipated to receive in the event that its private contingency fee agreements (or a percentage equal to the portion of the settlement fund designated for attorneys' fees) with its clients were enforced. While this exact amount is not yet known, \$8,000,000.00 is a reasonable estimate of the fee that Johnson Becker expected to receive, and is reasonable under both the percentage of the

fund and lodestar approach, as outlined in the accompanying Memorandum in Support of this Motion.

Dated: July 10, 2018

JOHNSON BECKER PLLC

/s/ Michael K. Johnson
Michael K. Johnson (MN Bar #258696)
JOHNSON BECKER, PLLC
444 Cedar St., Suite 1800
St. Paul, Minnesota 55101
Telephone: (612) 436-1800
Facsimile: (612) 436-1801
mjohnson@johnsonbecker.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/ Michael K. Johnson