

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

In re: Syngenta Litigation and
Syngenta Class Action Litigation

Case Type: Civil Other
Honorable Laurie J. Miller

This Document Relates to:
**INDIVIDUAL CLAIMS
CLASS ACTION**

Court File Nos.: 27-CV-15-3785 and
27-CV-15-12625

**DECLARATION OF JOSEPH M. LYON, ESQ IN SUPPORT OF MINNESOTA
CO-LEAD COUNSEL’S SUPPLEMENT TO THE JOINT MOTION FOR
APPROVAL OF COMMON BENEFIT AWARDS**

I, Joseph M. Lyon, declare and state as follows:

1. I am the sole partner at The Lyon Firm, A Law Corp., and am duly authorized to make this declaration on its behalf.

2. I submit this declaration in support of my firm’s contribution to Minnesota Co-Lead Counsel’s Joint Motion for Approval of Common Benefit Awards (the “Motion”). I have personal knowledge of the matters set forth in this declaration, and, if called as a witness, could and would testify competently thereto.

3. Attached as Exhibit A to this Declaration is the Court Ordered supplemental spreadsheet as required by the MDL Court’s July 18, 2018 Order Regarding Attorney Fee Submissions. ECF 3613.

4. In order to complete the spreadsheet attached as Exhibit A, I reviewed our time and expenses in this case and categorized the time and expenses in the manner required by the July 18, 2018 Order.

5. In the “Approved Common Benefit Work” column, I included only the time which was approved by Co-Lead Counsel through its audit process and submitted as Common Benefit time at Exhibit 14 to Mr. Gustafson’s Declaration in support of the Motion. I included any other work not previously submitted as common benefit time with the appropriate category designation, but in the column marked “Other Work.”

6. I can confirm that this time was undertaken personally. I believe that the time information submitted on behalf of my firm in the attached Exhibit A is accurate and complies with the MDL Court’s July 18 Order.

7. None of my firm’s expenses were submitted as Common Benefit expenses as part of the Motion. Nonetheless, I included my relevant expenses on the attached Exhibit A.

7. My firm’s listed expenses pertaining to this case are contemporaneously prepared from expense vouchers, and other documents and are an accurate record of such expenses. The expense information submitted on behalf of my firm in the attached Exhibit A is accurate and complies with the MDL Court’s July 18 Order.

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

Executed on this 2nd day of August, 2018 at 2021 Auburn, Cincinnati, Ohio 45219

/s/ Joseph M. Lyon
Joseph M. Lyon --OH 76050

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes	
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees		
Complaint drafting	Attorneys			39.00	\$15,600.00	Drafted Complaints for both States in coordination with Lockridge Grindel. Also prepared MD Consolidated Complaint with 79 Plaintiffs	
	Contract Attorneys						
	Non-attorneys						
Dispositive motion briefing/argument	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Class certification motion briefing and argument	Attorneys						
	Contract Attorneys						
	Non-attorneys						
DISCOVERY, DEPOSITIONS, DOC REVIEW							
Plaintiff fact sheet preparation/review	Attorneys	30.70	\$12,280.00				
	Contract Attorneys						
	Non-attorneys	97.50	\$7,312.50				
Paper discovery (Syngenta and third parties)	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Paper discovery against plaintiffs	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Discovery motion practice and communications with adverse parties	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Fact depositions (Syngenta and third parties)	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Defend fact depositions (of plaintiffs)	Attorneys	1.90	\$760.00			Assited in Coordinating depositions of bellwhether Duane Mathews	
	Contract Attorneys						
	Non-attorneys						
Discovery file management	Attorneys						
	Contract Attorneys						
	Non-attorneys						
EXPERT WORK, DAUBERT MOTIONS							
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys						
	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						
PRETRIAL PREP, TRIAL, AND POST TRIAL							
Motions in limine	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Trial (presenting witnesses and argument)	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Trial briefing and jury intructions	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Other pretrial motion practice	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Post-trial briefing	Attorneys						
	Contract Attorneys						
	Non-attorneys						
SETTLEMENT AND SETTLEMENT ADMINISTRATION							
Pre-settlement communication with clients	Attorneys			6.00	\$2,400.00	Meetings with local counsel to discuss settlement communications with clients.	
	Contract Attorneys						
	Non-attorneys						
Settlement negotiations	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Assisting clients in perfecting claims in settlement	Attorneys						
	Contract Attorneys						
	Non-attorneys						
Preparation of fee petition	Attorneys			6.00	\$2,400.00	Completed forms and affidavits for leadership and court.	
	Contract Attorneys						
	Non-attorneys						
ADMINISTRATIVE							
Administrative work as court-appointed	Attorneys						
	Contract Attorneys						

Relationship		Non-attorneys					
OTHER (describe in Notes)							
							Attended MDL hearing, case management conferences, and motions practice in person and via telephone
	Attorneys				15.00	\$6,015.00	
	Contract Attorneys						
	Non-attorneys						

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		
Photocopying	\$624.26	
Hotels		
Meals		
Mileage		
Air Travel		
Court Fees		
Transcript Fees		
Groud Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$624.26	