

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

**IN RE SYNGENTA AG MIR162 CORN
LITIGATION**

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

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

MDL No. 2591

*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

**KANSAS MDL CO-LEAD COUNSEL AND SETTLEMENT CLASS COUNSEL
CHRISTOPHER SEEGER'S PETITION FOR AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES, AND SERVICE AWARDS TO CLASS
REPRESENTATIVES/BELLWETHER PLAINTIFFS AND ALLOCATION OF
ATTORNEYS' FEE AWARD**

Kansas MDL Co-Lead Counsel and Settlement Class Counsel Christopher Seeger (collectively, the "Kansas Common Benefit Group") respectfully submit this petition for the award of attorneys' fees, reimbursement of expenses, service awards to certain class representative and bellwether plaintiffs and allocation of attorneys' fee award.

The Kansas Common Benefit Group respectfully requests that the Court enter an order: (1) award one-third of the \$1.51 billion settlement fund as attorneys' fees ("Fee Request"); (2) allocating 50% of that amount to MDL Co-Lead Counsel for distribution to the Kansas Common Benefit Group ("MDL Allocation"), 12.5% to the Minnesota Common Benefit Group ("MN

Allocation”), and 17.5% to the Illinois Group (“IL Allocation”); (3) approve \$388,005 in attorneys’ fees to Subclass Counsel from the remaining 20% and set aside the remainder until all other fee applications have been considered; (4) approve \$6,695,350.05 in reimbursement of costs and expenses to MDL Co-Lead Counsel for distribution to the Kansas Common Benefit Group (“Expense Request”); (5) authorize MDL Co-Lead Counsel to distribute the MDL Allocation to the Kansas Common Benefit Group and set a deadline for any objections to that allocation of 10 days after written notice of the allocation is made with a 14-day response period thereto; and, (6) approve the service awards requested in Appendix A to the accompanying memorandum for certain bellwether and class representative plaintiffs for their time and effort in prosecuting the litigation.

Contemporaneously with this motion, the Kansas Common Benefit Group is filing a memorandum and 43 declarations supporting the common-benefit work, time, expense and risk undertaken by these 44 law firms in prosecuting these claims and the time and effort expended and benefits conferred by the class representative and bellwether plaintiffs seeking service awards. In addition, attached to the memorandum are declarations of Subclass Counsel submitted in support of their application for fees and expenses and for service awards for the Subclass Representatives.

Dated: July 10, 2018

Respectfully Submitted,

/s/ Patrick J. Stueve

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on July 10, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Patrick J. Stueve

Plaintiffs' Co-Lead, Liaison, Class and Settlement
Class Counsel for Plaintiffs