

Paul LLP Supplemental Submission

LEGAL FEES TASK PERFORMED	PAUL LLP TIMEKEEPER	Approved Common Benefit Work		Other Work		Notes
		Hours	Fees	Hours	Fees	
Complaint drafting	Attorneys			571.70	\$338,552.50	This includes investigation and due diligence in the year before Cargill filed the first complaint, drafting of all individual complaints filed in the federal MDL and in Minnesota, and working with defense counsel on individual cases before the federal MDL was formed.
	Contract Attorneys					
	Non-attorneys			92.00	\$16,889.50	
Dispositive motion briefing/argument	Attorneys			2.10	\$1,365.00	Reading and preparing with Minnesota co-counsel on motion to dismiss hearing
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument	Attorneys			0.30	\$195.00	Analyzing potential class certification strategy in 2015 before complaints were filed.
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys			44.83	\$19,873.25	This is not duplicative of the Plaintiff Fact Sheet time that was submitted in the Minnesota leadership fee application. This time is the administrative portion of collecting documents, bates numbering and uploading documents, and converting information in FSA records to electronic data as required by the federal MDL Co-Leads in order to keep all individual clients out of the federal class.
	Contract Attorneys					
	Non-attorneys			507.05	\$78,529.00	
Paper discovery (Syngenta and third parties)	Attorneys			7.20	\$4,680.00	This is time spent drafting initial discovery in our individual cases to Syngenta before the federal and Minnesota MDLs were formed.
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs	Attorneys			1.80	\$495.00	Time spent drafting responses to discovery propounded to our client prior to client being dismissed as a class representative
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties	Attorneys			7.40	\$4,495.00	This is reading pleadings related to objections to common benefit and other administrative orders.
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys			1.10	\$550.00	General work on preparing for depositions
	Contract Attorneys					

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	Non-attorneys					
Defend fact depositions (of plaintiffs)	Attorneys					
	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			0.60	\$390.00	Reviewing investigative materials on potential experts
	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			38.60	\$22,330.00	Attended the Kansas trial in order to prepare for the Minnesota class trial.
	Contract Attorneys					
	Non-attorneys					
Trial briefing and jury instructions	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice	Attorneys			40.70	\$21,700.00	This is time spent on responding to motions to transfer.
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients	Attorneys			82.50	\$43,987.50	This is time spent giving updates on status of the litigation and responding to questions from clients, much of which was via phone calls.
	Contract Attorneys					
	Non-attorneys			183.20	\$31,267.50	
Settlement negotiations	Attorneys			20.40	\$12,915.00	
	Contract Attorneys					
	Non-attorneys					

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Assisting clients in perfecting claims in settlement	Attorneys			4.10	\$2,275.00	
	Contract Attorneys					
	Non-attorneys			455.20	\$64,518.50	
Preparation of fee petition	Attorneys			61.40	\$33,715.00	This is time spent preparing Paul LLP's declarations in support of the Kansas co-lead fee applications and supplemental application. Additionally, this includes time drafting Paul LLP's individual fee application and supplement.
	Contract Attorneys					
	Non-attorneys			53.70	\$9,844.50	
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys			49.60	\$30,470.00	This is time spent reading pleadings in the federal and Minnesota MDLS and attending hearings where Paul LLP was not taking the lead on briefing or argument.
	Contract Attorneys					
	Non-attorneys					
OTHER (describe in Notes)						
	Attorneys			920.3	\$525,835.00	All client acquisition time is included in this category along with time spent on leadership applications for the federal and Minnesota MDLS and time spent on the process to opt clients who were acquired after class certification was requested and thus had to be individually opted-out. This also includes ___ hours of general administrative work including, for example, managing client database, updating client contact information, obtaining FSA releases, working with FSA offices, and calculating acreage for clients, and creating the excluded client list to submit to the federal MDL co-leads to exclude clients from federal class certification.
	Contract Attorneys					
	Non-attorneys			558.1	\$95,246.50	

PAUL LLP EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$4,731.36	
Photocopying	\$2,145.47	
Hotels	\$4,631.55	
Meals	\$4,041.75	
Mileage		
Air Travel	\$13,146.12	
Court Fees	\$21,367.00	
Transcript Fees		
Groud Transportation	\$9,459.16	
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)	\$12,557.09	Research, mailing supplies, advertising, meeting room rental, PACER, local counsel fees, process service
TOTAL	\$72,079.50	