

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

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| IN RE: SYNGENTA AG MIR162 |) | MDL No. 2591 |
| CORN LITIGATION |) | |
| |) | Case No. 14-MD-02591-JWL-JPO |
| This Document Relates to All Cases <u>Except</u> : |) | |
| |) | |
| <i>Louis Dreyfus Co. Grains</i> |) | |
| <i>Merchandising LLC v. Syngenta AG,</i> |) | |
| No. 16-2788 |) | |
| |) | |
| <i>Trans Coastal Supply Co., Inc. v.</i> |) | |
| <i>Syngenta AG, No. 14-2637</i> |) | |
| |) | |
| <i>The Delong Co., Inc. v. Syngenta AG,</i> |) | |
| No. 17-2614 |) | |
| |) | |
| <i>Agribase Int’l Inc. v. Syngenta AG,</i> |) | |
| No. 15-2279 |) | |
| |) | |
| |) | |

**MOTION OF PAVLACK LAW, LLC ON BEHALF OF ITSELF
AND ITS CLIENTS AS WELL AS ASSOCIATED FIRMS FOR
AWARD OF ATTORNEY FEES AND REIMBURSEMENT OF COSTS**

Pavlack Law, LLC (the “Firm”), on behalf of the Firm, its co-counsel, and the Firm’s clients (collectively, “Movants”), pursuant to the Order preliminarily approving the class action settlement entered by the United States District Court for the District of Kansas in the case captioned *In re Syngenta AG MIR 162 Corn Litigation*, No. 14-MD-02591-JWL-JPO dated April 10, 2018 [Doc. 2591] and Rule 23 of the Minnesota Rules of Civil Procedure, hereby submits its Motion for Award of Attorneys’ Fees and Reimbursement of Costs. Movants seek payment of the contractually agreed upon fees and expense reimbursement between all Firm’s clients and the Firm from any fund created to pay attorneys’ and expenses arising out of the recently preliminarily approved class action in the Syngenta Litigation (the “Fund”). In the first alternative, Movants request payment of fees equal to thirty-three and one-third percent (33

1/3%) of all amounts recovered by the Firm (along with its expenses) from the Fund. In the second alternative, Movants request that the Firm be compensated from the Fund for their hourly time and costs in this litigation along with all requested, but unreimbursed, common benefit time. In the second alternative, Movants seek payment from the Fund of the Firm's reasonable hourly fees and costs incurred in the prosecution of this action. It is our understanding that the Hennepin County (Minnesota) District Court will retain jurisdiction over these issues. However, we are filing this pleading jointly in the United States District Court of Kansas (Case No. 2:14- md-02591) and in the Hennepin County District Court (File No. 27-CV-15-3785) because our Firm has received little to no guidance from the Court or Plaintiffs' leadership as to the proper filing of this brief concerning the contingent fee agreements with our 49 clients.

This Motion for Award of Attorneys' Fees and Reimbursement of Costs is supported by the accompanying memorandum of law, the Declaration of counsel, Eric S. Pavlack, along with corresponding time sheets, invoice of costs, and other documents. Fees and costs are sought for the entirety of representation.

Through its representation thus far, **the Firm has expended 365.9 hours of time, for a total of \$81,955.00 in attorneys' fees, and incurred costs in the amount of \$3,154.71. for the Firm's 49 clients.**

Dated: July 10, 2018

Respectfully Submitted

/s/ Eric S. Pavlack
 Eric S. Pavlack
 PAVLACK LAW, LLC
 9011 N. Meridian St., Ste. 203
 Indianapolis, IN 46260
 (317) 251-1100
 (317) 252-0352 fax
 Eric@PavlackLawFirm.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing document was served on counsel of record via the Minnesota Judicial Branch e-Filing System.

Dated: July 10, 2018

/s/ Eric S. Pavlack
Eric S. Pavlack