

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

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)	
)	
)	

**MEMORANDUM IN SUPPORT OF
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**

I. Introduction

Each of Pavlack Law, LLC’s clients retained Pavlack Law, LLC and its co-counsel¹ (collectively the “Firm”) to represent them in this case. This suit is subject to a certified class action, entitling the Firm to reasonable attorneys’ fees as authorized by both Rule 23(h) of the Federal Rules of Civil Procedure and Rule 23.08 of the Minnesota Rules of Civil Procedure. βThe Firm is entitled to be compensated for its substantial time and risk given the complexity and novelty of the legal issues involved and the substantial settlement reached. The fact that the

¹ Pavlack Law, LLC’s co-counsel on each of the cases it filed is the Indianapolis law firm of Wagner Reece, LLP; the law firm. Indiana lawyers Wayne Lennington and Pen Cosby are additional co-counsel on some, but not all, of Pavlack Law’s cases.

Firm was not designated as Class Counsel is not determinative as to which counsel are entitled to fees or costs. As the Tenth Circuit noted in *Gottlieb v. Barry*:

We fail to see why the work of counsel later designated as class counsel should be compensated, while the work of counsel who were not later designated class counsel, but on whose shoulders class counsel admittedly stood, should be wholly uncompensated.

43 F.3d 474, 488 (10th Cir. 1994).

II. Argument

A. Summary of Litigation and the Firm's Clients

The Firm's clients entered into Legal Service Agreements (the "Agreements") with the Firm between December 2015 and August 2016, regarding their claims against Syngenta. A true and accurate list of each of the Firm's clients is attached as Exhibit 1 to this pleading; [Exhibit 4 (hereafter "Pavlack Decl.") at ¶ 4]; [Exhibit 5 (hereafter "Reese Decl.") at ¶ 4].² The Agreements set forth that the Firm would advance court costs and litigation expenses. [Pavlack Decl. at ¶ 5]; [Reese Decl. at ¶ 5]. In other words, the Firm was not compensated up front for the representation of its clients and would be compensated only upon a recovery by the client. [*Id.*].

The Firm incurred substantial costs and litigation expenses in pursuit of its clients' claims. [Exhibit 3]. On top of that, the Firm anticipates that its work is not done now that there is a Settlement Agreement. [Pavlack Decl. at ¶ 15]. In fact, the Firm will continue to work and represent and advise our clients until they are compensated. [*Id.*]. Put plainly, when previously retained clients subsequently join a class action they generally continue to contact their attorney for advice on settlement forms and documents. The Firm and other independently retained

² Movants have not filed copies of the Fee Agreements, though Movants can present them to the Court for inspection upon request.

contingent fee counsel devoted a large amount of resources to this litigation despite considerable risk.

Although the Firm started signing clients in December 2015 and filing lawsuits by April 2016, [*id.* at ¶ 11], this Court (the “MDL Court”) did not certify this case as a class action until September 26, 2016 [Doc. 2547]. The MDL Court did not issue its “Order Appointing Plaintiffs’ Settlement Negotiation Committee in the Syngenta Litigation” until August 9, 2017 [Doc. 3366], and the Court did not preliminarily approve the certified class settlement until April 10, 2018 [Doc. 3532].

B. Prosecution of the Litigation

After transfer to the MDL, the Firm continued to do what it was retained and required to do: represent its clients throughout the course of litigation. This remained so even after the Court’s appointment of Co-Lead Counsel and the Plaintiffs’ Executive Committee (the “PEC”) on January 22, 2015. [Doc. 67]. Even after the Court’s designation of Co-Lead Counsel and the Plaintiff’s Executive Committee, the Firm was not informed that it should stop performing work on behalf of its clients or that it would not be compensated for the work performed, or expenses incurred.

Indeed, early on, the MDL Court recognized legitimate, competing interests between class and individual claims. In the January 22, 2015 “Order Concerning Appointment of Counsel”, at page 2, the Court noted as follows:

The court was especially impressed by the extent to which their lawyers had thought through the matter of advancing the interests of diverse groups of plaintiffs and built a team which takes those interests into account. Some of the plaintiffs in this case desire to proceed by individual actions. Others prefer the certification of one or more classes. Still others seek or will seek remand to state court. Some of the plaintiffs are large entities, others operate small farms. The DCPS group alone included representatives of each of these interests in its leadership team, including its proposed Executive Committee. Not only does the court agree that this is the

best way to proceed, but it believes that it bodes well for the expeditious handling of this litigation that the DCPS group anticipated this diversity and proposed an organization accordingly.

In that same order, the MDL Court noted Plaintiffs' co-lead counsel's duties, *inter alia*, "to encourage full cooperation and efficiency among all plaintiffs' counsel." The August 5, 2015 Minnesota Litigation Order appointing leadership, at page 3, contains substantially similar duties as those listed in the MDL order including the duty to encourage full cooperation and efficiency among all plaintiffs' counsel. In this same Minnesota order, the Minnesota Court appointed Robert Shelquist as Liaison Counsel and authorized him to, *inter alia*, "convene meetings of counsel as necessary [and] advise parties and attorneys of developments in the litigation" These Court orders are consistent with the Manual for Complex Litigation which requires liaison counsel to convene meetings of counsel, advise parties of developments, and other matters. *Man. Complex Lit.*, 2018, Section 10.221. The orders are also consistent with leadership duties, generally, to "fairly and adequately represent all of the parties on their side" and "to act fairly, efficiently, and economically in the interest of all parties and parties' counsel." *Id.*, at Section 10.22.

C. Independent Counsel Devoted Substantial Time, Risk and Effort to this Litigation.

In 2015, the law firm of Wagner Reese was contacted by several farmers interested in pursuing claims for China rejecting shipments of corn from the U.S., which caused a price drop in the value of corn. After researching the case, the Wagner Reese began hosting a series of town hall meetings to speak with farmers and sign contingency fee agreements for prosecution of their claims. Wagner Reese teamed up with Pavlack Law to file cases in the Minnesota proceedings on behalf of these clients, which resulted in Pavlack law filing four multi-plaintiff cases on behalf of a total of 49 plaintiffs.

Starting in 2016, after the Plaintiff Fact Sheet order was entered, the Firm spent hours contacting and meeting with farmers to obtain the documentation required by the order, knowing that if the information was not produced by the court deadlines, defense counsel could file a motion to dismiss the individual cases barring our clients from ever recovering. [Pavlack Decl. at ¶ 13]. After the long discovery process and monitoring the status of the bellwether cases around the country, our firm became aware in September 2017 about the potential settlement of all cases around the country. [*Id.*]. With the understanding there was settlement committees comprised of both individual and class action attorneys, it was believed there would be two settlement tracks. [*Id.*]. In early 2018 we became aware there would be only one Class Actions Settlement encompassing our filed cases and we began advising clients of the Settlement and what we believed was in their best interest. [*Id.*].

Throughout this process, the Firm filed pleadings, investigated the underlying facts of their individual cases, conducted research, reviewed the copious filings regarding this litigation, attended this Court's hearings and status conferences, and spent numerous hours explaining to class members all that was occurring along the way. [*Id.* at ¶ 14]; [Reese Decl. at ¶¶ 14–15]. The Firm devoted significant time and effort through the course of this litigation to pursue the claims of its clients.

The Firm believes the settlement is fair and in the best interests of our clients and we have recommended to our clients that they participate in the class action settlement. [Pavlack Decl. at ¶ 15]. Accordingly, the vast majority of the Firm's clients have chosen to participate in the class action settlement. [*Id.*]. Thus, in addition to prior time spent litigating the case and advising clients, the Firm has—and will continue—to assist class members with the settlement process. *Id.* In short, there is still much more class member hand-holding to do as the settlement

process unfolds over the following months or years as clients generally contact their attorney for advice as to any class related materials they may receive. [*Id.*].

The Firm is responsible for dozens of class members, and communications have increased and are expected to increase again as the settlement becomes operational. Unless the court awards attorneys' fees, independent counsel will have to continue to represent their clients for the following months or years without pay or terminate its representation. Put simply, there is no justification for treating class counsel work differently from non-class counsel work under this scenario.

Courts have held that the primary factor that should be considered in awarding attorney's fees is the risk of no recovery that counsel shoulders. *See, e.g., Ketchum v. Moses*, 24 Cal. 4th 1122, 1132 (Cal. 2001). Independent counsel prosecuted this case on a wholly contingent basis knowing that the litigation can (and did) last for years and would require devotion and a substantial amount of attorney time and significant advance of litigation expenses with no guarantee of compensation. On top of this, because of the size and scale of this litigation, a high degree of skill and efficiency was required to successfully prosecute this matter.

The undersigned, as well as the majority of non-class counsel in this case, worked for years before a class settlement was reached in this case. As such, the Firm deserves to have its fee contracts honored and paid from the settlement Fund. Indeed, class counsel did not incur the risk of several years' work educating farmers and signing clients with no guarantee of success. The years spent litigating this case makes it significantly dissimilar to the Volkswagen class action and the non-class counsel fee requests in that case. In the Volkswagen class action, plaintiffs' leadership was appointed on January 21, 2016, and the Court filed its preliminary approval of a class action settlement on July 29, 2016, a mere seven months later. Here, almost

three-and-one-half years passed between the MDL Court's appointment of leadership and the court's preliminary approval of the settlement.

D. Independent Counsel's Efforts Conferred Direct and Tangible Benefits to the Class

The United States Supreme Court "has recognized consistently that a litigant or a lawyer who recovers a common fund for the benefit of persons other than himself or his client is entitled to a reasonable attorney's fee from the fund as a whole." *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980); see, also, *Sprague v. Ticonic Nat'l Bank*, 307 U.S. 161 (1939) (when an attorneys' efforts benefit a common fund, the court is empowered to award fees from the fund). To prevent unjust enrichment, courts exercise their inherent equitable powers to assess attorneys' fees against the entire fund, thereby spreading the cost of those fees among everyone who benefited. *Sprague, supra*.

Furthermore, Rule 23(h) of the Federal Rules of Civil Procedure (as well as Rule 23.08 of the Minnesota Rules of Civil Procedure) authorizes awards of reasonable attorneys' fees in class actions. ("In a certified class action, the court may award reasonable attorney's fees and nontaxable costs that are authorized by law or by the parties' agreement."). This is true even if the applicant seeking attorney's fees was not designated class counsel. According to committee note to subsection Federal Rule 23(h):

[This rule] provides a format for all awards of attorney fees and nontaxable costs in connection with a class action, not only the award to class counsel. In some situations, there may be a basis for making an award to other counsel whose work produced the beneficial results of the class, such as attorneys who acted for the class before certification but were not appointed class counsel

Along these lines, the Tenth circuit held that non-designated counsel may be entitled to attorney fees in class actions where the non-designated counsel benefited the class as a whole. *Gottlieb, supra*, at 488. In *Gottlieb*, the District Court refused any award to non-designated

counsel on the grounds that their efforts did not contribute to the creation of the fund and that their failure to be designated as class counsel deprived them of any right to fees from the common fund. *Id.* at 486. In addition, the special master, found that work performed before class counsel was designated was duplicative of class counsel's work. *Id.* The Tenth circuit reversed the district court's decision holding "it seems implausible that all of sixteen months of work, pursued on multiple fronts by multiple counsel, suddenly becomes worthless upon the selection of a few counsel to serve as class counsel." *Id.*, at 489.

During the three-and-one-half years between the appointment of leadership and the preliminary approval of the class action settlement, the Firm and its attorneys spent hundreds of hours working on behalf of the Firm's clients. *See*, Exhibits 2 & 6. The work of the Firm and other non-Class Counsel maintained pressure on Syngenta as this years-long litigation wound its way to settlement negotiations. That process included consulting clients, the completion of thousands of plaintiff facts sheets and an extensive bellwether process, all of which provided information needed for settlement along with continued pressure on the Defendants.

This litigation required on-going and immense efforts of those involved. The resources of our Firm have been used to contact and consult with Class Members as they completed their Plaintiff Fact Sheets and to help them gather information for the settlement and to answer their questions regarding the case, and now, the preliminarily approved settlement. It is not unusual for any one such call to take 30 to 60 minutes of attorney or paralegal time. The Firm anticipates that all of the Firm's clients will timely complete settlement submissions. [Pavlack Decl. at ¶ 15]. This is work and legal advice that would have been performed by Class Counsel had it not been performed by the Firm.

E. Attorneys' Fees Requested

Generally, the Firm's clients executed written fee agreements with the Firm with contingent fees ranging from twenty percent (20%) to forty percent (40%). [Pavlack Decl. at ¶ 4]; [Reese Decl. at ¶ 4]. Movants request that the agreed-upon contingent fee and expenses as to each of the Firms' clients be paid from the Fund to be created from the preliminarily approved class action settlement. 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.³ Otherwise, Movants seek this Court's guidance as to what information it may need to evaluate the fee applications of non-Class counsel. Movants reserve the right to supplement this filing with such information as the Court may request.

In the event the Court requires the information at present, the hourly time and expenses incurred as to the Firm's clients are attached as Exhibits 2, 3 & 6 to this pleading. In total, 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. This is an average hourly fee of \$1,672.55 per claimant. As requested above, Movants seek an award of these expenses and this hourly time in the alternative to payment of its contingent fees. These rates are also fully justified by the skill, experience, and reputation of Plaintiffs' counsel.

³ The attached hourly billing summaries includes common benefit ("CB") time and non-CB time together. The Firm has submitted its CB time for consideration and obviously is not seeking double compensation for same. However, we do not know what portion of our requested CB time will ultimately be approved by the Court and we request compensation for any non-approved requested CB time as part of this fee application if hourly fees are awarded. In turn, we would not request payment for approved CB time through this application and would ask that the Court deduct any approved CB time from the calculations herein.

Mr. Pavlack is the managing attorney at Pavlack Law, LLC, and is admitted to practice in the State of Indiana. [Pavlack Decl. at ¶ 7]. Mr. Pavlack has over 19 years of experience in mass tort, class actions, and consolidated litigation that includes extensive experience in both state and federal courts. [*Id.*].

Mr. Pavlack has focused his practice on such cases over the past nineteen years, having represented dozens of classes in both local and national class action cases, and obtaining literally hundreds of millions of dollars for class members. *See, e.g., In re Ready-Mixed Concrete Antitrust Litig.*, No. 1:05-CV-00979-SEB, 2010 U.S. Dist. LEXIS 85003, 2010 WL 3282591 (S.D. Ind. Aug. 17, 2010); *In re Iowa Ready-Mix Concrete Antitrust Litig.*, No. C 10-4038-MWB, 2011 U.S. Dist. LEXIS 130180, 2011 WL 5547159 (N.D. Iowa Nov. 9, 2011). [Pavlack Decl. at ¶ 7].

Wagner Reese, LLP was founded by partners Stephen M Wagner and Jason R. Reese in 2000. [Reese Decl. at ¶ 7]. The Firm handles personal injury, product liability, complex litigation, and class action matters throughout Indiana and Illinois. [*Id.*]. Mr. Wagner was admitted to the Indiana bar in 1994 and has taken numerous cases to jury trial throughout his career. [*Id.*]. He was named the Trial Lawyer of the Year by the Indiana Trial Lawyers' Association (ITLA) in 2006 and is an elected member of the ITLA Board of Directors. Jason R. Reese was admitted to the bar in 1997 and is currently licensed in Indiana and Illinois. [*Id.*]. Mr. Reese has extensive jury trial experience throughout his career and has been repeatedly recognized by his peers as one the best trial lawyers in Indiana. His recognition began in 2003 when the Indiana State Bar Association named him "Outstanding Young Lawyer of the Year." [*Id.*]. In 2016 and 2018, Mr. Reese's peers voted him a Top 50 Super Lawyer for the State of Indiana. [*Id.*].

III. Conclusion

For the foregoing reasons, Movants respectfully ask this Court for payment of the fees and expenses of the Firm's clients from the Fund. Movants also seek any additional guidance from the Court as to information it may require to consider this request and accordingly seeks leave to amend or supplement this pleading as may be necessary.

Respectfully Submitted

/s/ Eric S. Pavlack

Eric S. Pavlack

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed with the Clerk via the CM/ECF system and an electronic copy was served upon all counsel of record on this 10th day of July 2018.

Dated: July 10, 2018

/s/ Eric S. Pavlack

Eric S. Pavlack

EXHIBIT 1

Clients of Pavlack Law, LLC & Co-Counsel

	<u>Business Name of Last Name</u>	<u>First Name</u>	<u>State</u>	<u>County</u>	<u>MN Civ Action #</u>
1	Armstrong	Craig	IN	Henry	27-CV-16-5970
2	Armstrong	Neil	IN	Henry	27-CV-16-5970
3	Bracken	Andrew	IN	Madison	27-CV-16-5970
4	Bracken	Vaughn	IN	Madison	27-CV-16-5970
5	C&N Armstrong Farms LTD		IN	Henry	27-CV-16-5970
6	Gamble	Anne	IN	Tippecanoe	27-CV-16-5970
7	Gamble	Larry	IN	Tippecanoe	27-CV-16-5970
8	Hannah	Gerald	IN	Carroll	27-CV-16-5970
9	Hannah	Shane O.	IN	Carroll	27-CV-16-5970
10	Herr	David	IN	Boone	27-CV-16-5970
11	Hornung	Ryan	IN	Union	27-CV-16-5970
12	Hornung	Terry	IN	Union	27-CV-16-5970
13	Hornung	Tyler	IN	Union	27-CV-16-5970
14	Lutes	Darryl L.	IN	Tippecanoe	27-CV-16-5970
15	Maxwell Farms		IN	Carroll	27-CV-16-5970
16	Sunkel	Steven R.	IN	Edgar	27-CV-16-5970
17	Wheatland Hx3 Farms LLC		IN	Knox	27-CV-16-5970
18	Ackley	Robert	OH	Trumbull	27-CV-16-9121
19	Ackley	Jay	OH	Trumbull	27-CV-16-9121
20	Becker	Brent	IL	Edgar	27-CV-16-9121
21	Brunes	Kevin	IN	Hendricks	27-CV-16-9121
22	Ennis	Jerry	IN	Morgan	27-CV-16-9121
23	Ennis	Bonnie	IN	Morgan	27-CV-16-9121
24	Flaningam	Richard	IN	Tippecanoe	27-CV-16-9121
25	Kinney	Richard	OH	Logan	27-CV-16-9121
26	Kinney	Samuel	OH	Logan	27-CV-16-9121
27	Kinney	Larry	OH	Logan	27-CV-16-9121
28	Peacock	Robert	IN	Grant	27-CV-16-9121
29	Peacock	Jane	IN	Grant	27-CV-16-9121
30	Sebastian	Kenneth	IN	Owen	27-CV-16-9121
31	Stone	Brad	IN	Parke	27-CV-16-9121
32	Everitt E. Gruber Family Trust		IN	Carroll	27-CV-16-9121
33	Cleone K. Gruber Family Trust		IN	Carroll	27-CV-16-9121
34	Williams	Jeffrey	IN	Morgan	27-CV-16-9121
35	Bruce Land Farms Inc.		IN	Madison	27-CV-16-9121
36	Dan Ennis Farms Inc.		IN	Morgan	27-CV-16-9121
37	Henderson	Mike	IN	Hamilton	27-CV-16-9121
38	L&R Rusch Farms, Inc.		IN	Knox	27-CV-16-9121
39	LLSS Partnership		IN	Knox	27-CV-16-9121
40	Fisher	James Brian	IN	Clinton	27-CV-16-9121
41	Brunes	Kent	IN	Center	27-CV-16-13118
42	Henderson	John	IN	Hamilton	27-CV-16-13118
43	Lisher	Cynthia	GA	Ware	27-CV-16-13118
44	Lisher	John	IN	Marion	27-CV-16-13118
45	Malcolm William Gauntt and Laurel Ann Gauntt Revocable Living Trust		IN	Huntington	27-CV-16-13118

46	Peil	Denise	IN	Tipton	27-CV-16-13118
47	Peil	Mark	IN	Tipton	27-CV-16-13118
48	Henman	Karl	IN	Vigo	27-CV-16-14683
49	M&S Snider Farms, Inc.		IN	Randolph	27-CV-16-14683

EXHIBIT 2							
TIME RECORDS OF PAVLACK LAW, LLC							
Firm Name	Timekeeper Name	Timekeeper Title	Date of Work Performed	Detailed Time Entry	Number of Hours Expended	TimeKeeper Rate	Lodestar
Pavlack Law LLC	Colin E. Flora	Attorney	11/4/15	Researching issues related to claim tolling by filing of MDL and multi-jurisdictional tolling; multiple discussions with Pavlack	4.2	\$450.00	\$ 1,890.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/4/15	Discussion with Flora re claim tolling by filing of MDL and multi-jurisdictional tolling	0.8	\$600.00	\$ 480.00
Pavlack Law LLC	Colin E. Flora	Attorney	11/12/15	Researching filing and admission of counsel in MDL; discussed with Pavlack	1.3	\$450.00	\$ 585.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/12/15	Discussion with Flora re filing and admission of counsel in MDL	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/15/15	Emails to and from Wagner Reese team re new clients	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Colin E. Flora	Attorney	11/16/15	Further research on effect of filing claim tolled by putative class action prior to ruling on certification; discussed with Pavlack	2.7	\$450.00	\$ 1,215.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/16/15	Discussion with Flora re effect of filing claim tolled by putative class action prior to ruling on certification	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/2/15	Emails to and from Cheney re service of Indiana class action on defendants	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/7/15	Email from Jessie Wolf re removal of class action filed in Indiana	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/6/16	Received and reviewed email from Wager re new client contracts; reviewed contracts	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Colin E. Flora	Attorney	1/7/16	Researching filing procedures in Hennepin County for Syngenta Cases	2.3	\$450.00	\$ 1,035.00
Pavlack Law LLC	Colin E. Flora	Attorney	1/7/16	Email to Rob Cooper regarding need to call court to determine all documents necessary for filing	0.3	\$450.00	\$ 135.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/7/16	Phone Call with Hennepin County Court re filing procedures and costs	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/17/16	Received and saved initial farmer information from co-counsel Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/17/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/17/16	Coordinated with Katelyn Blankenship for future distribution of farmer information	0.1	\$100.00	\$ 10.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/26/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/26/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric Pavlack	Attorney	2/11/16	Email to co-counsel re meeting to discuss status of compiling documents and info for PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	2/18/16	Meeting with Jason Reese, Steve Wagner, and team re case status, compilation of documents, completion of PFS, etc.	1.0	\$600.00	\$ 600.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/23/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/23/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/24/16	Multiple emails with Wagner Reese re notice to conform; discussions with internal team regarding same	0.8	\$600.00	\$ 480.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/25/16	Emails to and from Cheney and colleagues re service on foreign defendants	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/3/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/3/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/23/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/23/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/7/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/7/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00

Pavlack Law LLC	Robert Cooper	Paralegal	4/12/16	Received and saved initial farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/12/16	Processed and categorized initial farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/12/16	Conducted file review of all current Syngenta clients with Katelyn Blankenship	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Colin E. Flora	Attorney	4/26/16	Drafting, revising, finalizing, and filing <i>Armstrong</i> complaint, cover sheet, and certificate of representation	3.0	\$450.00	\$ 1,350.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/26/16	Reviewed, revised, and approved for filing <i>Armstrong</i> complaint, cover sheet, and certificate of representation	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Colin E. Flora	Attorney	4/27/16	Drafting and filing Notice to Conform for <i>Armstrong</i> ; discussed with Pavlack	0.6	\$450.00	\$ 270.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/27/16	Discussed with Flora Notice to Conform for <i>Armstrong</i>	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric Pavlack	Attorney	4/27/16	Received and reviewed Order re PFS; forwarded to Colin Flora; discussion with Flora re same	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Colin E. Flora	Attorney	4/27/16	Reviewed and discussed Order regarding Plaintiff Fact Sheets with Attorney Pavlack	0.6	\$450.00	\$ 270.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/4/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/17/16	Coordinated with Katelyn Blankenship on tracking client PFS progress	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/17/16	Created tracking spreadsheets for plaintiff fact sheet compliance	3.5	\$100.00	\$ 350.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/18/16	Communicated with Katelyn Blankenship on PFS tracking	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	5/18/16	Numerous emails to and from co-counsel and staff regarding evaluation of PFS and documents of	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric Pavlack	Attorney	5/18/16	Received, reviewed, and analyzed spreadsheet compiling data re all clients' PFS completion and	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Eric Pavlack	Attorney	5/18/16	Emails to and from co-counsel detailing PFS procedures; discussed with staff	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric Pavlack	Attorney	5/20/16	Emails from co-counsel re PFS status	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/23/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/24/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/24/16	Conference call with Wagner Reese regarding client PFS submissions	2.0	\$100.00	\$ 200.00
Pavlack Law LLC	Eric Pavlack	Attorney	5/24/16	Reviewed OPC affidavit re rolling production of PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/1/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/1/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/1/16	Conversation with Kelly LeRoy re PFS and service of same; emails to and from LeRoy; reviewed letter	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/1/16	Email from co-counsel re PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/2/16	Emails to and from LeRoy re PFS document compilation and production	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/3/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/3/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/6/16	Email from Barbara Files re FSA production deadline and PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/7/16	Received and saved new farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/7/16	Processed and categorized new farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/8/16	Email from co-counsel re PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/9/16	Email from co-counsel re Maxwell Farms production and PFS	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/13/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/13/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/14/16	Email from co-counsel re Maxwell Farms production and PFS	0.2	\$600.00	\$ 120.00

Pavlack Law, LLC	Eric Pavlack	Attorney	6/14/16	Conference call with Steve Wagner & Jason Reese re PFS and case status	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Colin E. Flora	Attorney	6/15/16	Drafting, revising, finalizing, and filing <i>Ackley</i> complaint, cover sheet, and certificate of	1.8	\$450.00	\$ 810.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/15/16	Drafting opt-out declaration; discussions with Pavlack	0.7	\$600.00	\$ 420.00
Pavlack Law LLC	Colin E. Flora	Attorney	6/15/16	Emailing opt-out declaration to Mr. Downing	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/15/16	Reviewed, revised, and approved for filing <i>Ackley</i> complaint, cover sheet, and certificate of	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/15/16	Discussed with Flora opt-out declaration; reviewed and approved	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/15/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/15/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/15/16	Reviewed and updated PFS tracking and identified deficient clients	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/15/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/15/16	Received and saved physical copies of new farmer information from Katelyn Blankenship	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/15/16	Processed, digitized and categorized physical copies of new farmer information for plaintiff fact sheet	1.5	\$100.00	\$ 150.00
Pavlack Law LLC	Colin E. Flora	Attorney	6/16/16	Drafting and filing Notice to Conform for <i>Ackley</i>	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/16/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/16/16	Reviewed and updated PFS tracking	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/16/16	Discussed with Eric Pavlack updated PFS and document production	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/16/16	Email from Cooper re comprehensive update on PFS completion and doc production; discussion	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/16/16	Received and reviewed Defendants' Motion to Compel Compliance with Order re PFS	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/20/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/21/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/21/16	Received from Shelquist and reviewed letter re service of PFS on defendants	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/22/16	Received and reviewed motion to extend PFS deadline	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/23/16	Received and saved new farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/23/16	Processed and categorized new farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/24/16	Set up FTP credentials for access to Kirkland & Ellis portal	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/24/16	Emails and Discussions with Cooper re PFS uploading procedures	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/24/16	Reading and sending emails to Eric Pavlack and discussion with Eric Pavlack regarding PFS	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/24/16	Received from Shelquist and reviewed statement of special master re mtm for extension of time re PFS	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/28/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	6/28/16	Received from Shelquist and reviewed defendants response to mtm extension of time	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/29/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	6/29/16	Reviewed and updated PFS tracking	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/30/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/1/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/1/16	Coordinated with Katelyn Blankenship on receiving additional PFS	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/1/16	Coordinated with Katelyn Blankenship on client compliance of plaintiff fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	7/1/16	Email from co-counsel re compliance with PFS deadlines and requirements	0.2	\$600.00	\$ 120.00

Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/6/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Colin E. Flora	Attorney	7/11/16	Processing and filing Affidavits of Service for <i>Armstrong</i> and <i>Ackley</i> ; discussed with Pavlack	0.6	\$450.00	\$ 270.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/11/16	Discussed with Flora Affidavits of Service for <i>Armstrong</i> and <i>Ackley</i> ; discussed with Pavlack	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/11/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/11/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	7/11/16	Email from Shelquist with update re PFS compliance and deadline	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/12/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/12/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/13/16	Received and saved new farmer information from Katelyn Blankenship	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/13/16	Processed and categorized new farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/13/16	Discussion with Eric Pavlack regarding stipulations as to PFSs	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	7/14/16	Reviewed stipulation re PFS; discussion with Cooper re same	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/18/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/18/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/19/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	7/19/16	Emails to and from co-counsel and staff re PFS compliance	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/21/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/22/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/26/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/28/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/29/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/2/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/2/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/2/16	Communicated with Katelyn Blankenship regarding client PFS information	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	8/2/16	Emails to and from co-counsel and staff re PFS compliance	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/3/16	Coordinated with Xact Data Discovery for digitization of PFS	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/4/16	Reviewed and updated PFS tracking	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Eric Pavlack	Attorney	8/4/16	Emails to and from co-counsel and staff re PFS compliance	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/5/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/5/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/5/16	Updated Katelyn Blankenship on client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/10/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/16/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/19/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/25/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/25/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00

Pavlack Law LLC	Robert Cooper	Paralegal	8/26/16	Conference with Eric Pavlack concerning PFS submission deadline, status of compiling records,	1.1	\$100.00	\$ 110.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/30/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law, LLC	Eric Pavlack	Attorney	8/30/16	Discussion with Cooper re PFS submission deadline and PFS status	1.1	\$600.00	\$ 660.00
Pavlack Law, LLC	Eric Pavlack	Attorney	8/30/16	Conference call with co-counsel and staff re case status, document compilation, completion of PFS,	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Colin E. Flora	Attorney	8/31/16	Drafting, revising, finalizing, and filing <i>Brunes</i> complaint, cover sheet, and certificate of	1.5	\$450.00	\$ 675.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/31/16	Reviewed, revised, and approved for filing <i>Brunes</i> complaint, cover sheet, and certificate of	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/31/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/31/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Colin E. Flora	Attorney	9/1/16	Drafting and filing Notice to Conform for <i>Brunes</i>	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Colin E. Flora	Attorney	9/2/16	Processing and filing Affidavits of Service on Syngenta Biotech and Syngenta Corp for <i>Brunes</i>	0.3	\$450.00	\$ 135.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/2/16	Communicated with Katey Robertson regarding PFS tracking and to familiarize her with our	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/2/16	Received and saved new farmer information from Katey Robertson	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/2/16	Processed and categorized new farmer information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/8/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/8/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Colin E. Flora	Attorney	9/9/16	Processing and filing Affidavits of Service on Syngenta Crop Protection and Syngenta Seeds for	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/9/16	Emailed liaison counsel regarding PFS tracking and submission	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/12/16	Worked with Katey Robertson to contact clients deficient on PFS submissions	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Eric Pavlack	Attorney	9/12/16	Email from co-counsel re Brent Becker PFS docs	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	9/12/16	Email from co-counsel re Bruce Land Farms PFS docs	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	9/12/16	Email from co-counsel re Gruber Family Farms PFS docs	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	9/12/16	Email from co-counsel re Jay Ackley PFS docs	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/13/16	Emailed liaison counsel for PFS submission stipulation	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/13/16	Received and saved client PFS information from Katey Robertson	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/13/16	Processed and categorized client PFS information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric Pavlack	Attorney	9/13/16	Conference call with co-counsel and staff re PFS status and strategy; emails regarding same	0.7	\$600.00	\$ 420.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/14/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/14/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/16/16	Uploaded multiple PFS to Kirkland FTP	1.8	\$100.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/21/16	Coordinated with Katey Robertson to receive additional PFS	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/26/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/27/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/27/16	Reviewed and updated PFS tracking	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/28/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Colin E. Flora	Attorney	10/5/16	Drafting, revising, finalizing, and filing <i>Henman</i> complaint, cover sheet, and certificate of	1.4	\$450.00	\$ 630.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/5/16	Reviewed, revised, and approved for filing <i>Henman</i> complaint, cover sheet, and certificate of	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/5/16	Coordinated with Katey Robertson to receive additional PFS	0.2	\$100.00	\$ 20.00

Pavlack Law LLC	Colin E. Flora	Attorney	10/7/16	Drafting and filing Notice to Conform for <i>Henman</i>	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/10/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/10/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/11/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/11/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/11/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law, LLC	Eric Pavlack	Attorney	10/11/16	Conference call with co-counsel and staff re case status, document compilation, completion of PFS,	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/13/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/18/16	Received and saved client PFS information from Katey Robertson	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/18/16	Processed and categorized client PFS information for plaintiff fact sheet	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/19/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/21/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/24/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/24/16	Reviewed and updated PFS tracking	0.4	\$100.00	\$ 40.00
Pavlack Law, LLC	Eric Pavlack	Attorney	10/25/16	Conference call with co-counsel and staff re case status, document compilation, completion of PFS,	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/26/16	Conference call with Wagner Reese regarding client PFS submissions	0.9	\$100.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	10/27/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/31/16	Communicated with Katey Robertson regarding client PFS compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Eric Pavlack	Attorney	10/31/16	Emails with co-counsel and staff regarding PFS status	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/1/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/2/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	11/2/16	Emails with co-counsel and staff regarding PFS status	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/3/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/3/16	Coordinated with Katey Robertson to receive additional PFS	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/4/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/14/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/21/16	Communicated with Kirkland & Ellis regarding PFS uploading to FTP	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/21/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	11/21/16	Emails to and from Cooper and OPC uploading PFS to FTP	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/22/16	Emails with Pavlack about uploading fact sheets	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/22/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law, LLC	Eric Pavlack	Attorney	11/24/16	Call with Katelyn Blankenship re document collection and PFS completion	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/28/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/30/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/1/16	Reviewed Syngenta referral update call from Watts Guerra	0.7	\$100.00	\$ 70.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/2/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/7/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00

Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/7/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/7/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/8/16	Communicated with Katey Robertson regarding client PFS compliance	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric Pavlack	Attorney	12/8/16	Email from Cooper re Armstrong and Ackley doc production	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/14/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/14/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/15/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/20/16	Email to Eric about Ackley and Armstrong	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/20/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/21/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/22/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/23/16	Communicated with Brian Shumaker regarding client PFS compliance	0.6	\$100.00	\$ 60.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/27/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/27/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	12/27/16	Multiple emails to and from co-counsel and staff re PFS status, including Maxwell Farms, and communications with farmers for compliance	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/28/16	Communicated with Brian Shumaker regarding client PFS compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/28/16	Reviewed and updated PFS tracking	0.5	\$100.00	\$ 50.00
Pavlack Law, LLC	Eric Pavlack	Attorney	12/28/16	Call with Brian Shumaker at WR re PFS and docs	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/29/16	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	12/30/16	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/30/16	Communicated with Brian Shumaker regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/3/17	Communicated with Brian Shumaker regarding contacting clients deficient on PFS submissions	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/4/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/4/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/4/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/9/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/9/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/9/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/9/17	Communicated multiple times with Brian Shumaker on contacting clients deficient on PFS submissions	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/10/17	Communicated multiple times with Brian Shumaker regarding client PFS compliance	0.7	\$100.00	\$ 70.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/10/17	Received and saved multiple client PFS docs from Brian Shumaker	1.5	\$100.00	\$ 150.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/10/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	2.0	\$100.00	\$ 200.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/11/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/11/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/11/17	Received and saved multiple client PFS docs from Brian Shumaker	1.5	\$100.00	\$ 150.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/11/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	2.3	\$100.00	\$ 230.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/12/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00

Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/13/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/13/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/17/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/17/17	Received and saved multiple client PFS docs from Brian Shumaker	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/17/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.9	\$100.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/18/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/19/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/24/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/26/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/27/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/27/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/27/17	Received and saved client PFS docs from Brian Shumaker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/27/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/30/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	1/30/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/1/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/1/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/1/17	Received and saved client PFS docs from Brian Shumaker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/1/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/3/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/3/17	Communicated with Brian Shumaker on contacting clients deficient on PFS submissions	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/6/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/14/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/16/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/22/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric Pavlack	Attorney	2/23/17	Emails to and from co-counsel and staff re document collection	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	2/24/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/1/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/1/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/2/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/7/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/10/17	Received and saved client PFS information from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/10/17	Processed and categorized client PFS information for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/13/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/14/17	Received and saved client PFS information from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/14/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00

Pavlack Law LLC	Robert Cooper	Paralegal	3/14/17	Communicated with Brian Shumaker and Meg Spiker on clients deficient on PFS submissions	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/15/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/16/17	Received and saved client PFS information from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/16/17	Processed and categorized client PFS information for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/16/17	Communicated with Wagner Reese on clients deficient on PFS submissions	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/16/17	Received and saved multiple client PFS docs from Meg Spiker	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/16/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/17/17	Received and saved multiple client PFS docs from Meg Spiker	1.1	\$100.00	\$ 110.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/17/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	1.5	\$100.00	\$ 150.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/20/17	Received and saved multiple client PFS docs from Meg Spiker	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/20/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/21/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/21/17	Reviewed and updated PFS tracking	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Colin E. Flora	Attorney	3/22/17	Email to Regina at Watts Guerra regarding list of opt outs	0.3	\$450.00	\$ 135.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/22/17	Communicated with Meg Spiker regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/27/17	Received reviewed, and saved client PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/27/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/28/17	Reviewed plaintiff documents and PFSs with attorney Flora	1.3	\$100.00	\$ 130.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/28/17	Participated in call with Meg Spiker and Colin Flora about outstanding documents and fact sheets for the Peacocks and Bruce Land Farms	0.6	\$100.00	\$ 60.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/28/17	Received and saved PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/28/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Reviewing documents from clients and determining what remains to be collected for Plaintiffs Fact Sheets along with Robert Cooper	1.3	\$450.00	\$ 585.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Drafting email to Meg Spiker regarding outstanding documents for Plaintiffs Fact Sheets for Peacocks and Brucleand Farms	0.2	\$450.00	\$ 90.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Reading email from Meg Spiker regarding outstanding documents for Plaintiffs Fact Sheets for Peacocks and Brucleand Farms	0.2	\$450.00	\$ 90.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Email to Eric Pavlack regarding documents for Plaintiffs Fact Sheets for Peacocks	0.1	\$450.00	\$ 45.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Reading email from Eric Pavlack regarding documents for Plaintiffs Fact Sheets for Peacocks	0.1	\$450.00	\$ 45.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Call with Meg Spiker regarding outstanding documents for Plaintiffs Fact Sheets for Peacocks and Brucleand Farms along with Robert Cooper	0.6	\$450.00	\$ 270.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Drafting email to Eric Pavlack regarding assembly of documents and completion of plaintiffs fact sheets for Peacocks and recapping call with Meg Spiker	0.3	\$450.00	\$ 135.00
Pavlack Law LLC	Eric Pavlack	Attorney	3/28/17	Email to and from Flora re outstanding documents	0.2	\$600.00	\$ 120.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Drafting email to Robert Cooper regarding deadlines for Plaintiffs Fact Sheets for all clients	0.2	\$450.00	\$ 90.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/28/17	Reading email from Meg Spiker regarding outstanding documents for Plaintiffs Fact Sheets for Peacocks and Brucleand Farms	0.2	\$450.00	\$ 90.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/29/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	3/29/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00

Pavlack Law, LLC	Colin E. Flora	Attorney	3/30/17	Email to Robert Cooper regarding follow up on Plaintiffs Fact Sheets for Peacocks, Brucleand Farms, and Robert Lisher	0.1	\$450.00	\$ 45.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/31/17	Discussed documents for and completed form for Plaintiffs Fact Sheets for Robert Lisher with Colin Flora	0.1	\$100.00	\$ 10.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/31/17	Communicated with Meg Spiker regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Eric Pavlack	Attorney	3/31/17	Emails to and from co-counsel and staff re PFS deficiencies	0.3	\$600.00	\$ 180.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/31/17	Reading email from Meg Spiker regarding documents for and completed form for Plaintiffs Fact Sheets for Robert Lisher	0.2	\$450.00	\$ 90.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/31/17	Discussing documents for and completed form for Plaintiffs Fact Sheets for Robert Lisher with Robert Cooper	0.1	\$450.00	\$ 45.00
Pavlack Law, LLC	Colin E. Flora	Attorney	3/31/17	Reading to email from Meg Spiker regarding documents for and completed form for Plaintiffs Fact Sheets for Robert Lisher	0.1	\$450.00	\$ 45.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/3/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/3/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/3/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/3/17	Received and saved PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	4/3/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric Pavlack	Attorney	4/3/17	Email from co-counsel re PFS	0.2	\$600.00	\$ 120.00
Pavlack Law, LLC	Colin E. Flora	Attorney	4/3/17	Reading email from Meg Spiker regarding documents for Plaintiffs Fact Sheets for Brucleand Farms and Ken Sebastian	0.3	\$450.00	\$ 135.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/4/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/4/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/5/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/5/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/5/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/10/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/11/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/12/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/12/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/13/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/17/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/17/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/20/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/20/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/20/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/24/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/25/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/26/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	5/4/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	5/25/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	5/26/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/5/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/12/17	Received and reviewed update email from Robert	0.2	\$600.00	\$ 120.00

Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	6/22/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/7/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/7/17	Communicated with Meg Spiker regarding client PFS tracking	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/10/17	Received and saved client PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/10/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/11/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/11/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	7/13/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/17/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/17/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/19/17	Received and saved client PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/19/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.7	\$100.00	\$ 70.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/24/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/24/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/27/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	7/27/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/2/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/2/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/3/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/3/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/3/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/3/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/7/17	Received and saved PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/7/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/8/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/14/17	Coordinated with Katey Robertson on client PFS documents	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric Pavlack	Attorney	8/14/17	Emails to and from co-counsel re PFS	0.3	\$600.00	\$ 180.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/15/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/15/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/16/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/16/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/24/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	8/24/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/30/17	Reviewed and updated PFS tracking	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Robert Cooper	Paralegal	8/30/17	Communicated with Wagner Reese multiple times concerning remaining client PFS deficiencies	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Eric Pavlack	Attorney	8/30/17	Numerous emails to and from co-counsel and staff re comprehensive review and update re PFS	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/1/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00

Pavlack Law LLC	Robert Cooper	Paralegal	9/1/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/5/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/5/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/6/17	Received and saved client PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/6/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/7/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/7/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/8/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/8/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/11/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/11/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/11/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/12/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/12/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/12/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/12/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/13/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/14/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/14/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/18/17	Communicated with Katey Robertson regarding client PFS compliance	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/19/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/19/17	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/19/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/19/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/19/17	Communicated with Katey Robertson regarding client PFS compliance	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/21/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/21/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/22/17	Received and saved multiple PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/22/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/25/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/25/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/26/17	Received and saved multiple PFS docs from Meg Spiker	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	9/26/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.8	\$100.00	\$ 80.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/11/17	Received and saved multiple PFS docs from Meg Spiker	1.0	\$100.00	\$ 100.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/11/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	1.4	\$100.00	\$ 140.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/16/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/16/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/18/17	Received and saved multiple PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	10/18/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/15/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00

Pavlack Law LLC	Robert Cooper	Paralegal	11/15/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/20/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/20/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/21/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/21/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/30/17	Received and saved multiple PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	11/30/17	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/4/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/4/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/22/17	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	12/22/17	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/11/18	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/11/18	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Eric Pavlack	Attorney	1/15/18	Emails to and from co-counsel and staff re correspondence with clients re updated documents	0.4	\$600.00	\$ 240.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/18/18	Received and saved multiple PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	1/18/18	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/1/18	Received and saved client PFS docs from Meg Spiker	0.2	\$100.00	\$ 20.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/1/18	Processed and categorized client PFS docs for plaintiff fact sheet compliance	0.3	\$100.00	\$ 30.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/15/18	Received and saved multiple PFS docs from Meg Spiker	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/15/18	Processed and categorized multiple client PFS docs for plaintiff fact sheet compliance	0.5	\$100.00	\$ 50.00
Pavlack Law LLC	Robert Cooper	Paralegal	2/15/18	Coordinated with Katey Robertson on client PFS compliance	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Robert Cooper	Paralegal	3/6/18	Coordinated with Katey Robertson on client PFS FSA form compliance	0.4	\$100.00	\$ 40.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	4/25/18	Received and reviewed preliminary approval order from Shelquist	0.5	\$600.00	\$ 300.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	5/23/18	Multiple emails with Wagner Reese team re client update letter settlement	0.6	\$600.00	\$ 360.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	5/23/18	Meeting with Wagner Reese team re settlement, claim forms, etc.	1.2	\$600.00	\$ 720.00
Pavlack Law LLC	Robert Cooper	Paralegal	5/29/18	Prepared paper mailing and informational packet to all clients	5.0	\$100.00	\$ 500.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	9/18/18	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
Pavlack Law LLC	Eric S. Pavlack	Lead Attorney	11/16/18	Received and reviewed update email from Robert Shelquist	0.2	\$600.00	\$ 120.00
TOTALS					179.4		\$ 57,655.00

EXHIBIT 3**EXPENSES OF PAVLACK LAW, LLC**

Firm Name	Date of Expense	Nature of Expense	Detailed Description	Amount of Expense
Pavlack Law	2016/08/03	Reprographics	Digitization of Plaintiff Fact Sheets for uploading onto Kirkland FTP	\$72.86
Pavlack Law	2016/05/09	Copying Costs	Copying fee to send summons, complaint (80 pages @ .10/page)	\$8.00
Pavlack Law	2016/05/09	Postage	Postage to send summons, complaint certified mail w/ return	\$33.00
Pavlack Law	2016/05/23	Reprographics	Integrity One Technologies scanning & indexing fee for filings	\$117.74
Pavlack Law	2016/05/23	Postage	Postage to send payment to Integrity One	\$0.47
Pavlack Law	2016/04/26	Filing Fee	Armstrong Filing Fee	\$431.00
Pavlack Law	2016/06/15	Filing Fee	Ackley Filing Fee	\$431.00
Pavlack Law	2016/07/12	Service Fee	Process service for Minnesota defendants (Ackley & Armstrong), Excel Legal Courier	\$190.00
Pavlack Law	2016/07/20	Service Fee	Brandywine Process Servers, Ltd.	\$186.00
Pavlack Law	2016/07/20	Postage	Postage for payment to Brandywine	\$47.00
Pavlack Law	2016/07/20	Reprographics	Integrity One Technologies scanning & indexing	\$114.93
Pavlack Law	2016/07/20	Postage	Postage for payment to integrity one	\$47.00
Pavlack Law	2016/08/31	Filing Fee	Brunes Filing Fee	\$431.00
Pavlack Law	2016/09/02	Service Fee	Brandywine Process Servers, Ltd., Brunes	\$108.00
Pavlack Law	2016/09/14	Reprographics	Xact Data Discovery for imaging/scanning	\$72.86
Pavlack Law	2016/09/14	Postage	Postage for payment to Xact Data Discovery	\$47.00
Pavlack Law	2016/10/05	Filing Fee	Henman Filing Fee	\$431.00
Pavlack Law	2016/10/11	Service Fee	Brandywine Process Servers, Ltd. (Henman)	\$10.00
Pavlack Law	2016/10/11	Postage	Postage to send payment to Brandywine	\$0.47
Pavlack Law	2016/10/12	Service Fee	Excel Legal Couriers (Brunes)	\$120.00
Pavlack Law	2016/10/12	Service Fee	Excel Legal Couriers (Henman)	\$120.00
Pavlack Law	2016/11/11	Reprographics	Integrity One Technologies scanning & indexing	\$37.84
Pavlack Law	2016/11/11	Postage	Integrity One Technologies postage	\$0.47
Pavlack Law	2017/10/10	Postage	Postage to send exlcusions (Grubers and Kinnevs)	\$0.67
Pavlack Law	2018/05/29	Postage	Postage to send settlement claim packet to class members (40 @ \$2.05/envelope)	\$82.00
Pavlack Law	2018/05/29	Copying Costs	Copying fee to send settlement claim packets (144 pages @ .10/page)	\$14.40
TOTALS				\$3,154.71

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

IN RE: SYNGENTA AG MIR162)	MDL No. 2591
CORN LITIGATION)	
)	
This Document Relates to All Cases <u>Except</u> :)	Case No. 14-MD-02591-JWL-JPO
)	
<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)	
)	
)	

**STATE OF MINNESOTA
COUNTY OF HENNEPIN**

**DISTRICT COURT
FOURTH JUDICIAL DISTRICT**

IN RE: SYNGENTA LITIGATION

Case Type: Civil Other
Hon. Laurie J. Miller

This Document Relates to:
All Cases

FILE NO. 27-CV-15-12625
and FILE NO. 27-CV-15-3785

**DECLARATION OF ERIC S. PAVLACK FOR PAVLACK LAW, LLC
IN SUPPORT OF 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**

I, Eric S. Pavlack, declare as follows:

1. I am over the age of twenty-one years old and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently to the facts contained herein, which are true and correct.

2. I am the managing attorney of Pavlack Law, LLC (hereinafter “the Firm”). I am authorized to submit this declaration on the Firm’s behalf.

3. I submit this declaration in support of the 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, (the “Motion”), filed pursuant to Section 7.2.1 of the Agrisure Viptera/Duracade Class Settlement Agreement (the “Settlement Agreement”) in *In Re: Syngenta AG MIR 162 Corn Litigation*, a multi-district litigation consolidated in the United States District Court for the District of Kansas before Hon. John W. Lungstrum (MDL-2591), and *In Re: Syngenta Litigation*, a Minnesota Consolidated Proceeding consolidated in the Fourth Judicial District Court, Hennepin County, Minnesota, before Hon. Laurie Miller (formerly Hon. Thomas Sipkins) (File Nos. 27-CV-15-3785 & 27-cv-15-12625).

4. Together with Wagner Reese, LLP, Wayne Lennington, and Pen Cosby, the Firm represents 49 clients in the Agrisure/Viptera litigation against Syngenta on a contingency basis. In written fee agreements, with three exceptions, each of these clients agreed to pay 40% of any recovery in this matter as a contingent fee, covering both legal fees, and further agreed to a division of those fees between the Firm and its co-counsels. Three clients, Craig Armstrong, Neil Armstrong, and C&N Armstrong Farms Ltd., have agreed to all of the same terms except that they agreed to pay 20% of any recovery.

5. As these were contingent fee agreements, our Firm advanced court costs and litigation expenses and would only be compensated if the clients recovered money.

6. Because my representation is on a contingency basis, I did not precisely track the time spent on this litigation since it was not anticipated this would be necessary. However, based on the review of my e-mails, notes, case management software, and other client and litigation

materials, I have retrospectively estimated my time spent on this litigation as set forth in this pleading and in my supporting Declaration. Any reference to dates in Exhibit 2 and Exhibit 3 are estimates based on the review of this information.

7. I was admitted to the Indiana bar in 1999, giving me nineteen years' experience practicing law. I have also been admitted to various Federal Courts. My main practice areas include mass torts, trial practice, products liability, personal injury, and class actions. I have focused my practice on such cases over the past nineteen years, having represented dozens of classes in both local and national class action cases, and obtaining literally hundreds of millions of dollars for class members. *See, e.g., In re Ready-Mixed Concrete Antitrust Litig.*, No. 1:05-CV-00979-SEB, 2010 U.S. Dist. LEXIS 85003, 2010 WL 3282591 (S.D. Ind. Aug. 17, 2010); *In re Iowa Ready-Mix Concrete Antitrust Litig.*, No. C 10-4038-MWB, 2011 U.S. Dist. LEXIS 130180, 2011 WL 5547159 (N.D. Iowa Nov. 9, 2011).

8. The Firm spent a total of 179.4 hours on this litigation, which is \$57,655.00 at our usual and customary hourly rates. A true and accurate listing of the hourly bill generated by my firm is incorporated into Exhibit 2 to the Motion. A true and accurate listing of the expenses generated by my firm is incorporated into Exhibit 3 to the Motion.

9. The Firm also incurred \$3,154.71 in expenses.

10. The individuals in the Firm, other than myself, who worked on this matter are:

- A. Eric S. Pavlack, managing attorney, admitted to practice in 1999, hourly rate \$600
- B. Colin E. Flora, associate attorney, admitted to practice in 2011, hourly rate \$450
- C. Robert Cooper, paralegal, hourly rate \$100
- D. Stephen M. Wagner, Partner, admitted to practice in 1994, hourly rate \$450-\$700, depending on the matter
- E. Jason R. Reese, Partner, admitted to practice in 1997, hourly rate \$450-\$700, depending on the matter
- F. Katelyn Blankenship, litigation staff, hourly rate, \$75
- G. Meg Spiker, litigation staff, hourly rate, \$75

H. Gary Cauble, litigation staff, hourly rate, \$75

11. In December 2015, our Firm was contacted by several farmers who knew about China rejecting shipments of corn from the U.S. and began seeing a price drop in the value of corn. After researching the case, our Firm began taking on clients and signed contingency fee agreements for prosecution of their claims. Counsel signed clients between December 2015 and August 2016.

12. The Firm filed four cases in the District Court for the Fourth Judicial District in Hennepin County on behalf of our clients under Civil Action Numbers 27-CV-16-5970, 27-CV-16-9121, 27-CV-16-13118, 27-CV-16-14683, in April, June, August, and October 2016.

13. Starting in 2016, after the Plaintiff Fact Sheet order was entered, the Firm spent more than one hundred hours contacting and meeting with farmers to obtain the documentation required by the order, knowing that if the information was not produced by the court deadlines, defense counsel could file a motion to dismiss the individual cases barring our clients from ever recovering. After the long discovery process and monitoring the status of the bellwether cases around the country, the Firm became aware in September 2017 about the potential settlement of all cases around the country. With the understanding there was settlement committees comprised of both individual and class action attorneys, it was believed there would be two settlement tracks. In early 2018 we became aware there would be only one Class Actions Settlement encompassing our filed cases and we began advising clients of the Settlement and what we believed was in their best interest.

14. Overall, I kept informed about this case by communicating with other counsel, reading court pleadings and public reports, and participating in status calls, so that I could advise

my clients as to the progress of the case—and I did keep them so informed, including by phone calls, emails, and in person meetings.

15. I believe the settlement is fair and in the best interests of our clients and we have recommended to our clients that they participate in the class action settlement. Accordingly, the Firm anticipates that all of the Firm's clients will timely complete settlement submissions. Thus, in addition to prior time spent litigating the case and advising clients, our Firm has—and will continue—to assist class members with the settlement process and will do so until all payments are made and the litigation is closed.

16. The Firm drafted complaints, completed and served plaintiff fact sheets, updated clients, and completed all other tasks necessary to prosecute these cases.

17. The time and expense figures above include 110.1 hours (\$21,585.00 at our usual and customary rates) and \$72.86 in costs and expenses submitted by my Firm to the Minnesota Co-Lead Counsel as Common Benefit Work and Common Benefit Expenses, in compliance with the Minnesota Common Benefit Order (entered by Judge Sipkins on December 7, 2015), and the Common Benefit Rules adopted by Co-Lead Counsel pursuant thereto.

18. The firm (and, to the best of my knowledge, non-class counsel generally) have received little to no guidance on certain issues related to representation of clients, including how our clients' fees and expenses will be paid in this litigation in light of the recent preliminarily approved class action settlement. I am not certain if plaintiffs' leadership has even broached these subjects with the defense or the court. Since I am left to conjecture how these issues will be resolved, I am not able to consult with my clients effectively.

19. The Firm has been advised by Minnesota Co-Lead Counsel that Minnesota Co-Lead Counsel's Fee & Expense Application in this matter will include and seek an award for all

approved Common Benefit Work and Common Benefit Expenses. As of today, however, I have not been provided the final word on how much of the Firm's common benefit time and expense has been so approved.

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

Executed on this 10th day of July, 2018, in Indianapolis, INDIANA.

A handwritten signature in black ink, appearing to read 'Eric S. Pavlack', is written over a horizontal line.

Eric S. Pavlack

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

IN RE: SYNGENTA AG MIR162)	MDL No. 2591
CORN LITIGATION)	
)	
This Document Relates to All Cases <u>Except:</u>)	Case No. 14-MD-02591-JWL-JPO
)	
<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)	
)	
)	
)	

**STATE OF MINNESOTA
COUNTY OF HENNEPIN**

**DISTRICT COURT
FOURTH JUDICIAL DISTRICT**

IN RE: SYNGENTA LITIGATION

Case Type: Civil Other
Hon. Laurie J. Miller

This Document Relates to:
All Cases

FILE NO. 27-CV-15-12625
and FILE NO. 27-CV-15-3785

**DECLARATION OF JASON R. REESE FOR WAGNER REESE, LLP
JOINING AND IN FURTHER SUPPORT OF
THE PAVLACK LAW FEE & EXPENSE APPLICATION**

I, Jason R. Reese, declare as follows:

1. I am over the age of twenty-one years old and make this declaration based on my personal knowledge. If called as a witness, I could and would testify competently to the facts contained herein, which are true and correct.

2. I am a partner of Wagner Reese, LLP (hereinafter “the Firm”). I am authorized to submit this declaration on the Firm’s behalf.

3. I submit this declaration in support of the Pavlack Law Fee & Expense Application (“the Application”), filed pursuant to Section 7.2.1 of the Agrisure Viptera/Duracade Class Settlement Agreement (the “Settlement Agreement”) in *In Re: Syngenta AG MIR 162 Corn Litigation*, a multi-district litigation consolidated in the United States District Court for the District of Kansas before Hon. John W. Lungstrum (MDL-2591), and *In Re: Syngenta Litigation*, a Minnesota Consolidated Proceeding consolidated in the Fourth Judicial District Court, Hennepin County, Minnesota, before Hon. Laurie Miller (formerly Hon. Thomas Sipkins) (File Nos. 27-CV-15-3785 & 27-cv-15-12625).

4. Together with Pavlack Law, Wayne Lennington, and Pen Cosby, the Firm represents 49 clients in the Agrisure/Viptera litigation against Syngenta on a contingency basis. In written fee agreements, with three exceptions, each of these clients agreed to pay 40% of any recovery in this matter as a contingent fee, covering both legal fees, and further agreed to a division of those fees between the Firm and its co-counsels. Three clients, Craig Armstrong, Neil Armstrong, and C&N Armstrong Farms Ltd., have agreed to all of the same terms except that they agreed to pay 20% of any recovery.

5. Because our representation is on a contingency basis, timekeepers at the Firm did not precisely track the time spent on this litigation since it was not anticipated this would be necessary. However, based on the review of e-mails, notes, case management software, and other client and litigation materials, we have retrospectively estimated time spent on this litigation as set forth herein. Any reference to dates in Exhibit A are estimates based on the review of this information.

6. Pavlack Law has acted as lead counsel in this matter and will file an Application for a Fee & Expense Award based on the clients' gross recoveries under the Settlement Agreement and the private fee contracts with each such client. The Firm supports and joins that Application for contract fees.¹

7. Wagner Reese, LLP was founded by partners Stephen M Wagner and Jason R. Reese in 2000. The Firm handles personal injury, product liability, complex litigation, and class action matters throughout Indiana and Illinois. Mr. Wagner was admitted to the Indiana bar in 1994 and has taken numerous cases to jury trial throughout his career. He was named the Trial Lawyer of the Year by the Indiana Trial Lawyers' Association (ITLA) in 2006 and is an elected member of the ITLA Board of Directors. Jason R. Reese was admitted to the bar in 1997 and is currently licensed in Indiana and Illinois. Mr. Reese has extensive jury trial experience throughout his career and has been repeatedly recognized by his peers as one the best trial lawyers in Indiana. His recognition began in 2003 when the Indiana State Bar Association named him "Outstanding Young Lawyer of the Year." In 2016 and 2018, Mr. Reese's peers voted him a Top 50 Super Lawyer for the State of Indiana.

8. Much of the Firm's time was spent ensuring that its 49 clients complied with the Minnesota Court's Order that all plaintiffs complete a Plaintiff Fact Sheet (PFS) and produce voluminous documents proving corn production. Our key responsibilities included (1) providing steady updates to our clients throughout the duration of the Syngenta litigation, by way of email, letter correspondence, and telephone calls, and (2) handling the bulk of incoming client document

¹ To avoid the Firm's clients being charged a greater fee than those paid by passive class members who did not retain counsel, the Firm agrees that, should the Courts order a 1/3 fee in this case, the fees under the contract between the Firm's individual clients and Pavlack Law and the Firm should be limited to 1/3. Furthermore, the Firm has no objection to paying a proportionate share of its fee as a common benefit assessment as previously agreed in Joint Prosecution Agreements.

processing to ensure PFS compliance. This undertaking included scanning, emailing, or mailing originals, filing, and updating our master client spreadsheet to ensure PFS compliance. I estimate that the Firm's actual time spent on this matter for our forty-nine (49) clients from September 2015 to present is 186.5 hours, which is \$24,300 at our usual and customary hourly rates.

9. The individuals in the Firm who worked on this matter are:

- A. Stephen M. Wagner, Partner, admitted to practice in 1994, hourly rate \$450-\$700, depending on the matter
- B. Jason R. Reese, Partner, admitted to practice in 1997, hourly rate \$450-\$700, depending on the matter
- C. Katelyn Blankenship, litigation staff, hourly rate, \$75
- D. Meg Spiker, litigation staff, hourly rate, \$75
- E. Gary Cauble, litigation staff, hourly rate, \$75

10. I kept informed about this case by communicating with Pavlack Law, reading court pleadings and public reports, and participating in status calls, so that I could advise my clients as to the progress of the case – and I did keep them so informed including by phone calls, emails, video messages, and in-person meetings.

11. Since the settlement was approved, the Firm has continued to work closely with Pavlack Law to inform our clients about the settlement and the claims form process. These updates were given by way of correspondence, along with email updates and phone calls.

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

Executed on this 10th day of July, 2018, in CARMEL, INDIANA.

A handwritten signature in black ink, appearing to read "Jason R. Reese". The signature is written in a cursive style with a large initial "J".

JASON R. REESE

EXHIBIT 6**TIME RECORDS OF WAGNER REESE, LLP**

Firm Name	Timekeeper Name	Timekeeper Title	Date of Work Performed	Detailed Time Entry	Number of Hours Expended	TimeKeeper Rate	Lodestar
Wagner Reese	Jessie Wolf	Syngenta Coordinator	2015/12/04	Receive communication from client Gerald Hanna including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Jessie Wolf	Syngenta Coordinator	2015/12/16	Receive communication from client Maxwell Farms including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Jessie Wolf	Syngenta Coordinator	2015/12/30	Receive communication from client Vaughn Bracken including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Jessie Wolf	Syngenta Coordinator	2015/12/30	Receive communication from client Andrew Bracken including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Jessie Wolf	Syngenta Coordinator	2015/12/30	Receive communication from client Bruce Land Farms including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/01	Receive communication from client Brad Stone including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/15	Receive communication from client Wheatland Hx3 Farms including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/15	Receive communication from client Peacock including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Tyler Hornung including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Ryan Hornung including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Terry Hornung including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Bonnie Ennis including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Dan Ennis including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Jerry Ennis including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Jeffrey Williams including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Shane Hanna including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/17	Receive communication from client Larry Gruber including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/18	Receive communication from client Samuel Kinney including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/18	Receive communication from client Richard Kinney including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/01/18	Receive communication from client Larry Kinney including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00

Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/02/12	Receive communication from client Kent Bruner including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/02/12	Receive communication from client Kevin bruner including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/02/22	Receive communication from client Kenneth Sebastian including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/02/29	Draft and send out update letter to all clients	2.5	\$75.00	\$ 187.50
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/03/03	Receive communication from client Ackley including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/03/23	Receive communication from client Steven Sunkel including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/03/28	Receive communication from client Gamble including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/03/29	Receive communication from client Daryl Lutes including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/04/06	Receive communication from client Flaningam including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Steve Wagner	Partner	2016/04/07	Travel to/from client Craig Armstrong's farm; meet with Armstrong to answer questions re: litigation update and PFS compliance	4.6	\$700.00	\$ 3,220.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/04/07	Receive communication from client C&N Armstrong Farms LTD a including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/04/07	Receive communication from client Neil Aromstrong including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/04/07	Receive communication from client Craig Armstrong including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Steve Wagner	Partner	2016/04/12	Travel to/from client Larry Gamble's farm; meet with Gamble to answer questions re: status of litigation update and review production records; assist with PFS response	4.1	\$700.00	\$ 2,870.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/02	Hand delivered client docs to Pavlack office	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/05	Receive communication from client John Henderson including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/17	Receive communication from client James Fisher including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/20	Receive communication from client John Lisher including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/25	Receive communication from client Laurel Gauntt including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/27	Receive communication from client James Lisher including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/05/27	Receive communication from client Mike Henderson including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/06/03	Receive communication from client Cynthia Lisher a including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/06/06	Receive communication from client LLSS Parntership including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/06/06	Receive communication from client CL&R Rusch Farms including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00

Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/06/06	Receive communication from client David Herr including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/06/20	Draft and send out update letter to all clients	2.5	\$75.00	\$ 187.50
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/08/29	Receive communication from client Karl Henman including completed information sheet with production estimate	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/09/21	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/09/21	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/11/21	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Katelyn Blankenship	Syngenta Coordinator	2016/12/23	Receive and review production records from client Maxwell Farms	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/02/22	Email to JR & SW re Opt Out tracking client spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/02/27	Email to JR & SW re Opt Out tracking client spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/02/27	Email to JR re letters to client about missing opt outs	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/02/27	Revised and emailed client update letter to Meg	0.5	\$700.00	\$ 350.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/02/28	Email to JR re letters to client about missing opt outs	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/01	TC w Robert re getting access to client tracking spreadsheet	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/02	Meeting w JR re PFS documents missing from client	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/02	Modified client tracking spreadsheet to send to Gary	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/02	Emailed client tracking spreadsheet to Gary	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/02	Emailed corrected client tracking spreadsheet to Gary	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/03/02	Meeting w Meg re clients w missing docs	1.0	\$700.00	\$ 700.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/03	Emailed client tracking spreadsheet to JR	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/03	Call project to all farmers to answer questions, update contact information, and go over missing documents still needd	5.0	\$75.00	\$ 375.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to JR re progress in obtaining missing client documents	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	TC w Gary re Lisher client missing files	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to JR and SW re Lisher client missing files	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to JR & SW asking for clarification on contract fees	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Gary re answers to contract fee questions	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Gary and SW re client tracking spreadsheet error	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Robert re update on Bonnie Ennis file	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Gary re Lishers opt outs	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Robert re Lishers op outs	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Robert re updating client spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Gary re Becker signing with another attorney	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to JR re focusing efforts on PFS documents	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Robert re asking for blank PFS	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/06	Email to Robert re blank PFS to review	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/06	Call project to all farmers to answer questions, update contact information and go over missing documents still needd	8.0	\$75.00	\$ 600.00
Wagner Reese	Jason Reese	Partner	2017/03/06	Email to Meg re opt out progress	0.2	\$700.00	\$ 140.00
Wagner Reese	Jason Reese	Partner	2017/03/06	Email to Meg re answers to Gary questions	0.2	\$700.00	\$ 140.00
Wagner Reese	Steve Wagner	Partner	2017/03/06	TC w Lary Gamble re missing docs	0.5	\$700.00	\$ 350.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Email to Sw & JR re blank PFS to review	0.2	\$75.00	\$ 15.00

Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Email to Sw & JR re Gary's update on PFS compliance	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Email to Robert re opt out form for Flanigam	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Sent f/u email to SW & JR re blank PFS review	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/07	Sent email to JR & SW re opt out progress	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Updated client tracking spreadsheet for Piel	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Email to SW & JW re Gary's progress w PFS compliance	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Updated client spreadsheet to mirror Gary's progress	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Call project to all clients re PFS compliance	2.0	\$75.00	\$ 150.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Email to Robert re update on client PFS compliance	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/08	Email to JR & SW re Mike Henderson now deceased - how to proceed with file?	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/08	Email to Meg re updated client PFS compliance spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/08	Call w Jacob Henderson re dad's death and file + email to Meg re update	0.5	\$75.00	\$ 37.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/08	Email to Meg re Henderson file	0.2	\$75.00	\$ 15.00
Wagner Reese	Steve Wagner	Partner	2017/03/08	TC w Craig Armstrong re missing opt outs and docs	0.5	\$700.00	\$ 350.00
Wagner Reese	Jason Reese	Partner	2017/03/08	Email to Gary re Mike Henderson file	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/10	Email to Robert re Jerry Ennis update on file	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/03/11	Email to Meg and SW re update on PFS compliance	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/13	Email to JR re update on Lisher files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/14	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/14	Email to Robert re APH forms	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Email to Robert re Jerry Ennis update on file	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Email to EP, SW & JR re updated on cleint tracking spreadsheet	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Email to Gary re LLSS Partnership, M&S Snider Farms, and Gauntt Rev Trust - all files complete	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/16	7 Emails of client docs for Ackley clients to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/16	Email to Meg re Becker file	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/16	Email to Meg re LLSS Partnership, M&S Snider Farms, and Gauntt Rev Trust files, requesting review	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/16	Call project to f/u w farmers who did not answer first round	2.0	\$75.00	\$ 150.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/17	Email to Robert re Lisher PFS compliance	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/17	Email to EP, JR & SW re Gary's progress in obtaining client docs	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/17	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/17	Email to Meg re updated client PFS compliance spreadsheet	0.2	\$75.00	\$ 15.00

Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/20	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/20	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/20	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/20	TC w Maxwell Farms re opt out and missing documents	0.5	\$75.00	\$ 37.50
Wagner Reese	Jason Reese	Partner	2017/03/20	Email to meg re opt out deadline and PFS compliance	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/21	Email Robert re opt out for LLSS Partnership	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/21	Email Robert re opt out for LLSS Partnership	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/22	TC w Gary to go through every client's PFS compliance	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/22	Email to EP SW & JR re update on every client's PFS compliance	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/22	Calculate acreage for clients w no opt out yet & email to JR, SW & EP	0.6	\$75.00	\$ 45.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/22	TC w Meg re Peacock files	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/22	TC w Gary re Peacock files	0.5	\$75.00	\$ 37.50
Wagner Reese	Jason Reese	Partner	2017/03/22	Call project to large acreage client w no options	1.0	\$700.00	\$ 700.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/24	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/27	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/28	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/28	Email to Colin Flora re update on Peacocks and Bruce Land Farms files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/28	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/28	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/28	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/03/28	TC w Bruce Land re files and missing docs + update email to Meg	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/29	Email to JR re update on Peacocks and Bruce Land Farms files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/30	Email to Robert re update on Peacocks and Bruce Land Farms files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/03/31	Email to EP, SW, & JR re update on client tracking spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/04/03	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/07	Update client spreadsheet	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/07	Email to Robert re updated client spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/07	Email to JR, EP, and SW re updated client spreadsheet w outline of trouble clients	0.5	\$75.00	\$ 37.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/07/07	Email to Meg w updated client PFS compliance spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/10	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/10	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00

Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/11	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/11	Email to Gary re Peacocks missing documents	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/07/11	Email to Meg re review of Sebastian, Peacock and Ackley files	0.3	\$75.00	\$ 22.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/07/11	Email to Meg re f/u to question about Peacock files	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/07/14	Revised client update letter	0.5	\$700.00	\$ 350.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/19	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/19	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/20	Drafted update letter to all clients	1.5	\$75.00	\$ 112.50
Wagner Reese	Steve Wagner	Partner	2017/07/21	Revised client update letter	0.5	\$700.00	\$ 350.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/24	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/07/27	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/02	Email to Robert re the need for 2016 documents	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/02	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/07	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/08/12	Email to Meg re Jim Fisher file	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/14	Email to Gary re Lishers files	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/14	Email to Robert re Lisher seed receipts	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Jason Reese	Partner	2017/08/30	Email to Gary asking to contact clients w missing docs	0.2	\$700.00	\$ 140.00
Wagner Reese	Jason Reese	Partner	2017/08/30	Revised letter to Peacockand Williams client	0.5	\$700.00	\$ 350.00
Wagner Reese	Jason Reese	Partner	2017/08/30	Email to Gary req meeting	0.3	\$700.00	\$ 210.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/08/31	Email to Gary re updated client spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/01	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/01	Email to Meg re review of Lisher insurance docs	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/06	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/06	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/06	Email to Gary re review of client files M&S Snider Farms and Maxwell Farms	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/06	TC w Bradley Stone re missing docs + update email to Meg	0.5	\$75.00	\$ 37.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/06	Email to Meg re review of M&S Snider Farms and Maxwell Farms docs	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/07	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/07	TC w Maxwell Farms re missing docs + update email to Meg	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/12	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Jason Reese	Partner	2017/09/13	Email to Meg re clients w missing docs	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/14	Email to JR re clients missing opt outs	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/14	Email to Gary re clients missing opt outs, need final push	0.3	\$75.00	\$ 22.50

Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/14	Email to JR re updates on clients missing opt outs and missing docs	0.3	\$75.00	\$ 22.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/14	Call project to clients w no opt out	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/18	Email to Gary re update on Gruber file	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/18	Email to Rob re review client files Hornung, Hanna, and Sunkel	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/19	Created client contact information spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/19	Email to SW, JR, and EP re updated client spreadsheet for PFS complaince	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/19	Email to Meg re update contact info for John Henderson	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/19	Email to Meg re updated client PFS compliance spreadsheet	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/09/20	Email to SW req him to call Craig Armstrong w update	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/21	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/21	Compiled PFS compliance breakdown spreadsheet and emailed to SW, JR & EF	1.5	\$75.00	\$ 112.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/22	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/22	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/22	Email to Meg encl FSA for client	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/22	Email to Meg encl FSA for client	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/22	TC w Craig Armstrong re missing documents + email update to Meg	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/25	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/25	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/26	Email to EP, SW, and EF re trial update	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/09/26	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Gary Cauble	Litigation Assistant	2017/09/26	Email to Meg encl client docs	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/10	Email to EP re Gruber files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/11	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/11	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/11	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/16	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/10/18	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Jason Reese	Partner	2017/11/05	Email to Meg req update on PFS compliance	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/06	Email to Gary re Lisher files	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/06	Email to JR and SW re updated compliance breakdown spreadsheet	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/06	Drafted update letter to all clients	0.5	\$75.00	\$ 37.50
Wagner Reese	Gary Cauble	Litigation Assistant	2017/11/06	Email to Meg encl client docs	0.2	\$75.00	\$ 15.00
Wagner Reese	Jason Reese	Partner	2017/11/06	Email to Meg req update on PFS compliance	0.2	\$700.00	\$ 140.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/07	Revise, print, scan, mail letters to clients	1.5	\$75.00	\$ 112.50
Wagner Reese	Jason Reese	Partner	2017/11/07	Revised update letter to clients	0.5	\$700.00	\$ 350.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/15	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00

Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/20	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/21	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/11/30	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/12/04	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/12/08	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/12/19	Email to EP re ideas for sending updated letter to clients	0.3	\$75.00	\$ 22.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2017/12/22	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/01/11	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/01/18	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/01/18	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/01/18	Email updated client spreadsheet to Gary	0.2	\$75.00	\$ 15.00
Wagner Reese	Gary Cauble	Litigation Assistant	2018/01/18	TC w Larry Rusch re status of claim	0.4	\$75.00	\$ 30.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/02/01	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/02/07	Drafted update letter to all clients	0.6	\$75.00	\$ 45.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/02/15	Receved and review production records from client + Email client docs to Robert + update spreadsheet	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/02/15	Email to EP, JR, and SW re updated letters to clients	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/02/16	Revise, print, scan, mail letters to clients	1.5	\$75.00	\$ 112.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/03/06	Created new spreadsheet to add additional columns and info, emailed to EP	0.5	\$75.00	\$ 37.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/11	Drafted update letter to all clients	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/15	Email to EP re update letter to clients	0.2	\$75.00	\$ 15.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/23	Revised client update letters and drafted script for update phone calls	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/24	Drafted Claim Form Guide to help clients w claim form	1.0	\$75.00	\$ 75.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/24	Printed and put together 50 Claim Form Guides to send clients	0.7	\$75.00	\$ 52.50
Wagner Reese	Meg Spiker	Syngenta Coordinator	2018/05/29	Call project to all clients re claim form and to expect letter in mail	2.0	\$75.00	\$ 150.00
Wagner Reese	Meg Spiker	Syngenta Coordinator	2/29/2017	Print, scan, mail letters to clients	1.0	\$75.00	\$ 75.00
TOTALS					186.5		\$ 24,300.00