

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

---

IN RE SYNGENTA AG MIR162 CORN  
LITIGATION

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

THIS DOCUMENT RELATES TO:

MDL No. 2591

ALL CASES

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MOTION OF PENDLEY, BAUDIN & COFFIN, L.L.P., SAEED & LITTLE, L.L.P., and  
BENJAMIN F. MARSHALL, ESQ. ON BEHALF OF THEMSELVES AND THEIR  
RESPECTIVE CLIENTS FOR AWARD OF COMMON BENEFIT ATTORNEYS' FEES  
AND REIMBURSEMENT OF COSTS

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Pendley, Baudin & Coffin, L.L.P., Saeed & Little, L.L.P., and Benjamin F. Marshall, Esq., are (collectively "Movers"), pursuant to this Court's Order Preliminarily Approving the Class Action Settlement in this case dated April 10, 2018 [Doc. 2591] and Federal Rules of Civil Procedure 23, hereby submit their Motion for Award of Common Benefit Attorneys' Fees and Reimbursement of Costs. Movers seek payment of the common benefit fees and expense reimbursement between their respective clients and Movers from any fund created to pay attorneys' fees and expenses arising out of the recently preliminarily approved class action in the Syngenta Litigation (the "Fund"). In the alternative, Movers seek payment from the Fund of the Firms' reasonable hourly fees and costs incurred in the prosecution of this action on a common benefit basis.

This Motion for Award of Common Benefit Attorneys' Fees and Reimbursement of Costs is supported by the accompanying Memorandum of Law, the Declaration of

Counsel, Patrick W. Pendley, Esq. and Jon Little, Esq., the Declarations of other attorneys that assisted with representation of the respective clients in the Syngenta Corn Litigation, along with corresponding time sheets, invoices, costs and other documents. Fees and costs are sought for only common benefit of representation, the heretofore mentioned law firms have expended a total of 442.25 hours as hereafter set forth:

<u>FIRM/ATTORNEY</u>	<u>HOURS EXPENDED</u>
Pendley, Baudin & Coffin, L.L.P.	253.85
Saeed & Little, L.L.P.	88.40
Benjamin F. Marshall, Esq.	100
<b>TOTAL HOURS:</b>	<b>442.25</b>

Dated: July 10, 2018

**RESPECTFULLY SUBMITTED BY:**

/s/ Patrick W. Pendley

**PATRICK W. PENDLEY (LSBA #: 10421)**

*Pendley, Baudin & Coffin, L.L.P.*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document was electronically filed on this 10<sup>th</sup> day of July, 2018, with the Clerk of Court using the CM/ECF system, which sent notification of filing to all attorneys of record.

/s/ Patrick W. Pendley  
**PATRICK W. PENDLEY**

IN THE UNITED STATES DISTRICT COURT  
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TABLE OF AUTHORITIES

Civil Rules

Federal Rules of Civil Procedure, Rule 23(h)

1

Cases:

Gottlieb vs. Barry, 43 F.3d 474, 488 (10<sup>th</sup> Cir. 1995).

1, 2, 3

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COMMON BENEFIT ATTORNEYS' FEES AND REIMBURSEMENT OF COSTS

---

On behalf of themselves and their clients for award of common benefit attorneys'  
fees and reimbursement of costs

**I. INTRODUCTION**

This suit is a certified class action, entitling the Movers to reasonable common benefit attorneys' fees and reimbursement of expenses as authorized by the Federal Rules of Civil Procedure 23(h). The work of the movers herein has in part contributed to the successful resolution of this litigation on behalf of all claimants.

None of the Movers herein have been designated as Class Counsel herein, notwithstanding, Movers rely on 10<sup>th</sup> Circuit jurisprudence in *Gottlieb vs. Barry* which held [we fail to see where 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 (10<sup>th</sup> Cir. 1995).

## II. ARGUMENT

The Movers herein entered into Attorney Client Contracts with their respective clients regarding their claims against Syngenta. Those agreements provided that Movers would advance court costs and litigation expenses in prosecution of the claims. To that extent, Movers would only be compensated by their clients upon monetary recovery by each client.

Notwithstanding that this MDL has been settled, the Movers anticipate that their respective work will continue on behalf of their respective clients to facilitate monetary recovery by each client.

Although the individual lawsuits were not transferred to a Multidistrict Litigation proceeding until late 2014, the bulk of Movers' services were performed subsequent to that transfer order. This litigation was certified as a class action on September 26, 2016 [Doc. 2547]. The Order appointing Plaintiffs' Settlement Negotiation Committee is dated August 9, 2017 [Doc. 3366] and this Court preliminarily approved the class settlement on April 10, 2018 [Doc. 3532].

Mover, PBC was responsible for cases being filed in Kansas, Indiana, Arkansas, Alabama and Louisiana. Benjamin F. Marshall was responsible for filing cases in Louisiana. Saeed & Little, L.L.P. filed the Indiana case.

Movers attach herewith the following exhibits:

Exhibit "A": PBC itemization of attorney time and expenses;



Exhibit "B": Saeed & Little itemization of attorney time and expenses;

Exhibit "C": Description of Benjamin F. Marshall, IV attorney time and work;

Exhibit "D": Declaration of Patrick W. Pendley, Esq.;

Exhibit "E": Declaration of Jonathon S. Little, Esq.; and,

Exhibit "F": Declaration of Benjamin F. Marshall, IV, Esq.

Throughout the process, Movers continued to respond to their respective clients and facilitate the discovery responses pursuant to request by Class Counsel. While clearly Movers' time and expenses pale in comparison to some of the other law firms who represented hundreds, if not a thousand or more clients, nevertheless, Movers respectfully suggest that they are entitled to some common benefit award for their effort to support a successful resolution of the overall litigation. Movers again reiterate that it is not their desire to "double-dip" by the receipt of a common benefit fee award, full or partial reimbursement of their litigation expenses and will provide appropriate credit to their clients for any funds so received.

Clearly the rule of law in the 10<sup>th</sup> Circuit is that non-designated Class Counsel may be entitled to attorneys' fees in class actions with the effort of non-designated counsel benefit the class as a whole. *Gottlieb, supra, at 488*.

The Movers submit that the settlement is fair and in the best interest of their respective clients and have recommended to their clients that each client participate in the class action settlement. To Movers' knowledge, all of their respective clients will participate in the class action settlement and that fact alone will require that Movers

continue to facilitate the claims of their clients until the class action is finally concluded. The Attorney Client Contracts executed by Movers and their respective clients generally provide for a one-third (1/3) to forty percent (40%) attorney fee, plus reimbursement of expenses. Movers therefore request that each be compensated from the settlement fund for their hourly time and costs in this litigation based upon their common benefit effort. Movers would appreciate the opportunity to supplement this filing with such information as the Court may request in consideration of the Motion.

### III. CONCLUSION

For the foregoing reasons, Movers respectfully request this Court for payment of their common benefit fees and reimbursement of common benefit expenses from the settlement fund. Movers also seek any additional guidance from the Court as to information it may require, to consider this request and the opportunity to supplement this filing as necessary.

Dated: July 10, 2018.

**RESPECTFULLY SUBMITTED BY:**

/s/ Patrick W. Pendley

**PATRICK W. PENDLEY (LSBA #: 10421)**

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I hereby certify that a true and accurate copy of the foregoing document was electronically filed on this 10<sup>th</sup> day of July, 2018, with the Clerk of Court using the CM/ECF system, which sent notification of filing to all attorneys of record.

/s/ Patrick W. Pendley

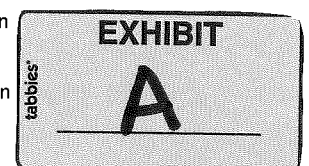
**PATRICK W. PENDLEY**

Date: 06/18/2018

Detail Transaction File List  
Pendley, Baudin & Coffin, L.L.P.

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	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmnt # Rate	Hours to Bill	Amount		Ref #
Fees										
	350.21330	05/23/2018	10	P	21	100.00	5.00	500.00	Miscellaneous, review case files for contracts/web site claim forms Syngenta Corn Litigation 2133 Syngenta Corn Litigation	61
	350.21330	05/25/2018	10	P	21	100.00	1.50	150.00	Miscellaneous, MDL website for claim forms/settlement information Syngenta Corn Litigation 2133 Syngenta Corn Litigation	62
	Subtotal for Tcode 21					Billable	6.50	650.00	Miscellaneous,	
	350.21330	01/07/2016	1	U	301	500.00	0.75	375.00	Conference with Jonathan to review pleadings and lay out plan for filing; letter to Hashin acknowledging receipt of all documents Syngenta Corn Litigation 2133 Syngenta Corn Litigation	51
	Subtotal for Tcode 301					Billable	0.75	375.00	Conference with	
	350.21420	01/05/2015	25	U	302	100.00	0.40	40.00	Correspondence: Letter with contract & intake sheet to Jeanie Rogers. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	11
	350.21750	06/04/2015	25	U	302	100.00	2.00	200.00	Correspondence: filed notice to conform (4) Corn Litigation MDL 2175 Corn Litigation MDL	12
	350.21750	06/26/2015	25	U	302	100.00	2.00	200.00	Correspondence: notice to conform Corn Litigation MDL 2175 Corn Litigation MDL	13
	350.21330	09/28/2015	13	U	302	45.00	0.50	22.50	Correspondence email Cigler and Marshall re: PFS Syngenta Corn Litigation 2133 Syngenta Corn Litigation	48
	350.21330	10/28/2015	13	U	302	45.00	0.50	22.50	Correspondence conference call regarding PFS Syngenta Corn Litigation 2133 Syngenta Corn Litigation	49
	Subtotal for Tcode 302					Billable	5.40	485.00	Correspondence	
	350.21330	11/01/2014	1	U	305	500.00	0.50	250.00	Drafting a letter to all N. E. LA and Ark Rice clients concerning the upcoming corn litigation; email to Ben Marshall. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	2
	350.21560	12/01/2014	1	U	305	500.00	3.00	1,500.00	Drafting complaint and exchanging emails with Eddie Sexton. Alabama Corn Litigation 2156 Alabama Corn Litigation	4
	350.21330	12/02/2014	1	U	305	500.00	8.00	4,000.00	Drafting the Alabama, Mississippi and Louisiana corn complaints and some emails back and forth. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	25
	350.21330	05/20/2015	13	U	305	45.00	1.80	81.00	Draft notices to conform. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	36
	350.21330	04/25/2018	11	P	305	100.00	0.50	50.00	Drafted update letter to all clients notifying them of upcoming class notice. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	59
	Subtotal for Tcode 305					Billable	13.80	5,881.00	Draft	
	350.21330	10/30/2014	5	U	306	250.00	3.00	750.00	Drafted complaint; legal research. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	14
	350.21330	10/31/2014	5	U	306	250.00	9.00	2,250.00	Drafted complaint. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	13
	350.21330	11/17/2014	5	U	306	250.00	3.00	750.00	Drafted complaint; call with Adam Levitt & Pat. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	11
	350.21330	11/21/2014	5	U	306	250.00	7.50	1,875.00	Drafted complaint; call with Raiter; clients, legal research; review of JPML file. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	17
	350.21420	12/02/2014	5	U	306	250.00	6.00	1,500.00	Drafted complaint. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	4
	350.21330	12/04/2014	5	U	306	250.00	1.50	375.00	Drafted pleading. Syngenta Corn Litigation	27



Date: 06/18/2018

Detail Transaction File List  
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Fees	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount		Ref #
	350.21750	03/11/2015	25	U	306	100.00	1.50	150.00	2133 Syngenta Corn Litigation Drafted letter to counsel. Corn Litigation MDL 2175 Corn Litigation MDL	9
	Subtotal for Tcode 306					Billable	31.50	7,650.00	Drafted	
	350.21420	12/03/2014	25	U	307	100.00	0.30	30.00	E-Mailing: Emailing complaints to attorneys. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	13
	350.21550	12/03/2014	25	U	307	100.00	0.30	30.00	E-Mailing: Emailing complaints to attorneys. Mississippi Corn Litigation 2155 Mississippi Corn Litigation	10
	350.21330	12/03/2014	25	U	307	100.00	0.30	30.00	E-Mailing: Emailing complaints to attorneys. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	29
	350.21420	12/13/2014	1	U	307	500.00	1.00	500.00	E-Mailing: Emails to all local counsel about the current happenings in corn and Syngenta "release" issue. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	10
	350.21330	08/04/2015	13	U	307	45.00	0.20	9.00	E-Mailing: email Little Creek Farms; check other states class reps & plaintiff fact sheets Syngenta Corn Litigation 2133 Syngenta Corn Litigation	41
	350.21420	08/07/2015	13	U	307	45.00	0.90	40.50	E-Mailing: send emails to clients Louisiana Corn Litigation 2142 Louisiana Corn Litigation	14
	350.21330	03/04/2016	29	U	307	250.00	0.30	75.00	E-Mailing Dax Whitfield regarding certifying Barton Fanns fact sheet production Syngenta Corn Litigation 2133 Syngenta Corn Litigation	52
	Subtotal for Tcode 307					Billable	3.30	714.50	E-Mailing	
	350.21330	11/18/2014	18	U	311	500.00	3.50	1,750.00	Meeting with Pat and Nick. Dinner meeting with plaintiff group co-counsel. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	54
	350.21420	11/19/2014	1	U	311	500.00	8.00	4,000.00	Meeting in Chicago of Plaintiff attys; good meeting much discussion regarding causes of action against Syngenta. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	3
	350.21330	11/19/2014	18	U	311	500.00	3.90	1,950.00	Meetings- Plaintiffs' Meeting. Post-meeting with Pat & Nick. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	55
	350.21340	03/11/2015	16	U	311	250.00	0.75	187.50	Meeting with: Meet with Pat regarding responding to removal under CAFA; review complaint & research. Arkansas Corn Litigation 2134 Arkansas Corn Litigation	1
	Subtotal for Tcode 311					Billable	16.15	7,887.50	Meeting with	
	350.21330	11/03/2014	10	U	312	100.00	5.00	500.00	Miscellaneous: Scheduling Order; emails to attorneys; corn contract and intake sheet. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	5
	350.21330	11/07/2014	5	U	312	250.00	2.75	687.50	Miscellaneous: Research; drafted complaint; com. with other lawyers. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	21
	350.21330	11/09/2014	5	U	312	250.00	0.75	187.50	Miscellaneous: Comm. with potential reps. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	19
	350.21330	11/09/2014	5	U	312	250.00	3.50	875.00	Miscellaneous: Calls with potential reps; drafted complaint. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	20
	350.21330	11/11/2014	5	U	312	250.00	1.00	250.00	Miscellaneous: Calls. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	18
	350.21330	11/17/2014	25	U	312	100.00	3.50	350.00	Miscellaneous: Typed pleading onto computer. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	8
	350.21330	11/18/2014	25	U	312	100.00	0.75	75.00	Miscellaneous: Typed pleading in computer. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	7
	350.21330	11/19/2014	25	U	312	100.00	4.00	400.00	Miscellaneous: Typed Pleading.	6

Date: 06/18/2018

Detail Transaction File List  
Pendley, Baudin & Coffin, L.L.P.

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<u>Fees</u>	<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
								Syngenta Corn Litigation	
350.21330		11/19/2014	16	U	312	250.00	0.50	125.00	15
								2133 Syngenta Corn Litigation	
								Miscellaneous: Additional research on potential for RICO action.	
350.21330		12/01/2014	5	U	312	250.00	0.50	125.00	10
								Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
350.21330		12/01/2014	25	U	312	100.00	0.50	50.00	24
								Miscellaneous: Logged onto Pacer & printed docs for Jon Little (Exhibits "K" & "O") & then forwarded via email.	
350.21330		12/02/2014	25	U	312	100.00	3.00	300.00	23
								Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
								Miscellaneous: Made corrections to complaint; prepared for Alabama.	
350.21420		12/02/2014	25	U	312	100.00	1.25	125.00	8
								Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
								Miscellaneous: Edited complaint & prepared civil cover sheet.	
350.21550		12/02/2014	25	U	312	100.00	0.50	50.00	4
								Louisiana Corn Litigation	
								2142 Louisiana Corn Litigation	
								Miscellaneous: edited document to reflect Mississippi litigation.	
350.21550		12/03/2014	5	U	312	250.00	1.75	437.50	1
								Mississippi Corn Litigation	
								2155 Mississippi Corn Litigation	
350.21560		12/03/2014	5	U	312	250.00	1.50	375.00	1
								Miscellaneous: Edited complaint.	
								Mississippi Corn Litigation	
								2155 Mississippi Corn Litigation	
350.21420		12/03/2014	25	U	312	100.00	1.00	100.00	6
								Alabama Corn Litigation	
								2156 Alabama Corn Litigation	
								Miscellaneous: Corrections to complaint.	
350.21420		12/03/2014	25	U	312	100.00	0.50	50.00	7
								Louisiana Corn Litigation	
								2142 Louisiana Corn Litigation	
								Miscellaneous: Corrections to corn complaint.	
350.21550		12/03/2014	25	U	312	100.00	0.75	75.00	2
								Louisiana Corn Litigation	
								2142 Louisiana Corn Litigation	
								Miscellaneous: Made corrections.	
350.21550		12/03/2014	25	U	312	100.00	1.25	125.00	3
								Mississippi Corn Litigation	
								2155 Mississippi Corn Litigation	
350.21560		12/03/2014	25	U	312	100.00	0.50	50.00	3
								Miscellaneous: Corrections to complaint.	
								Alabama Corn Litigation	
350.21420		12/04/2014	25	U	312	100.00	2.50	250.00	5
								2156 Alabama Corn Litigation	
								Miscellaneous: Filed LA complaint.	
350.21560		12/04/2014	25	U	312	100.00	0.25	25.00	2
								Louisiana Corn Litigation	
								2142 Louisiana Corn Litigation	
								Miscellaneous: Editing complaint.	
350.21330		12/04/2014	10	U	312	100.00	4.00	400.00	26
								Alabama Corn Litigation	
								2156 Alabama Corn Litigation	
								Miscellaneous: File complaint.	
350.21420		12/22/2014	25	U	312	100.00	0.80	80.00	12
								Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
								Miscellaneous: Organized file.	
350.21550		01/08/2015	13	U	312	45.00	1.00	45.00	8
								Louisiana Corn Litigation	
								2142 Louisiana Corn Litigation	
								Miscellaneous: Pull PSC applications from PACER.	
350.21750		01/13/2015	25	U	312	100.00	5.00	500.00	4
								Mississippi Corn Litigation	
								2155 Mississippi Corn Litigation	
								Miscellaneous: Revised curriculum vitae; drafted motion for appt. to plaintiffs steering committee; worked on pro hac docs.	
350.21750		01/13/2015	1	U	312	500.00	4.50	2,250.00	5
								Corn Litigation MDL	
								2175 Corn Litigation MDL	
								Miscellaneous: General file work on Motion to be Appointed to leadership and revising my C. V.; reviewing the draft of the Plaintiffs Preliminary Statement.	
350.21750		01/14/2015	25	U	312	100.00	1.60	160.00	3
								Corn Litigation MDL	
								2175 Corn Litigation MDL	
								Miscellaneous: Worked on pro hac motion & application.	
350.21750		01/14/2015	25	U	312	100.00	1.30	130.00	6
								Corn Litigation MDL	
								2175 Corn Litigation MDL	
								Miscellaneous: Finalized motion to appoint & emailed to Judge.	
								Corn Litigation MDL	

Date: 06/18/2018

Detail Transaction File List  
Pendley, Baudin & Coffin, L.L.P.

Page: 4

Fees	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	Ref #
	350.21750	01/21/2015	1	U	312	500.00	15.00	7,500.00	7
								2175 Corn Litigation MDL Miscellaneous: In Kansas City for status conference with Judge Lungstrum and return to Plaquemine to night. Corn Litigation MDL	
	350.21330	01/21/2015	5	U	312	250.00	9.00	2,250.00	31
								2175 Corn Litigation MDL Miscellaneous: Corn MDL hearing in K. C., meetings. Syngenta Corn Litigation	
	350.21340	03/02/2015	16	U	312	250.00	0.50	125.00	2
								2133 Syngenta Corn Litigation Miscellaneous: Summarize removal & discuss with PP. Arkansas Corn Litigation	
	350.21750	03/11/2015	25	U	312	100.00	0.20	20.00	10
								2134 Arkansas Corn Litigation Miscellaneous: Electronically filed Notice of Voluntary Dismissal. Corn Litigation MDL	
	350.21330	08/18/2015	13	U	312	45.00	0.70	31.50	42
								2175 Corn Litigation MDL Miscellaneous: complete PFS Syngenta Corn Litigation	
	350.21330	09/09/2015	13	U	312	45.00	0.30	13.50	44
								2133 Syngenta Corn Litigation Miscellaneous, PFS Syngenta Corn Litigation	
	350.21330	09/22/2015	13	U	312	45.00	0.40	18.00	47
								2133 Syngenta Corn Litigation Miscellaneous, call clients for PFS Syngenta Corn Litigation	
	350.21330	03/08/2016	11	U	312	100.00	0.50	50.00	53
								2133 Syngenta Corn Litigation Miscellaneous, searched for PFS for Nick in file Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
	Subtotal for Tcode 312					Billable	82.30	19,160.50	
								Miscellaneous,	
	350.21330	11/12/2014	5	U	315	250.00	4.00	1,000.00	12
								Prepare: Prep for MDL; discussion with counsel; drafted complaints. Syngenta Corn Litigation	
	350.21420	12/09/2014	25	U	315	100.00	2.75	275.00	9
								2133 Syngenta Corn Litigation Prepared corporate disclosure statement. Louisiana Corn Litigation	
	350.21550	12/09/2014	25	U	315	100.00	1.00	100.00	5
								2142 Louisiana Corn Litigation Prepared complaint, civil cover sheet & corporate disclosure statement & emailed to Steve Mullins. Mississippi Corn Litigation	
	350.21750	12/24/2014	25	U	315	100.00	0.50	50.00	2
								2155 Mississippi Corn Litigation Prepared Pro Hac docs. Corn Litigation MDL	
	350.21750	03/11/2015	25	U	315	100.00	1.00	100.00	11
								2175 Corn Litigation MDL Prepared Notice of Voluntary Dismissal; Petition; emailed to counsel. Corn Litigation MDL	
	350.21330	05/18/2015	13	U	315	45.00	2.30	103.50	34
								2175 Corn Litigation MDL Prepare Notice of conform for plaintiff clients. Syngenta Corn Litigation	
	350.21330	06/08/2015	13	U	315	45.00	2.90	130.50	37
								2133 Syngenta Corn Litigation Prepare notices to conform Syngenta Corn Litigation	
	350.21330	06/10/2015	13	U	315	45.00	1.50	67.50	38
								2133 Syngenta Corn Litigation Prepare drafts of notices to conform Syngenta Corn Litigation	
	350.21330	07/27/2015	13	U	315	45.00	2.00	90.00	39
								2133 Syngenta Corn Litigation Prepare plaintiff fact sheets for non-class reps Syngenta Corn Litigation	
	350.21330	08/03/2015	13	U	315	45.00	4.20	189.00	40
								2133 Syngenta Corn Litigation Prepare plaintiff fact sheets Syngenta Corn Litigation	
	350.21330	09/14/2015	13	U	315	45.00	4.30	193.50	45
								2133 Syngenta Corn Litigation Prepare and file PFS Syngenta Corn Litigation	
	350.21330	09/15/2015	13	U	315	45.00	3.40	153.00	46
								2133 Syngenta Corn Litigation Prepare B&B fact sheet Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	
	Subtotal for Tcode 315					Billable	29.85	2,452.00	
								Prepare	
	350.21330	12/12/2016	11	U	316	100.00	0.50	50.00	56
								Receipt and review email from Linda Scott regarding filing additional claims; forwarded email to PWP for advice on responding Syngenta Corn Litigation	
								2133 Syngenta Corn Litigation	



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					Subtotal for Tcode 316	Billable	0.50	50.00	Receipt and review	
	350.21330	11/19/2014	16	U	317	250.00	1.75	437.50	Research for potential RICO action. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	16
	350.21550	12/29/2014	13	U	317	45.00	4.80	216.00	Research for any related entities; pull memo from Pacer Syngenta v. Bonge. Mississippi Corn Litigation 2155 Mississippi Corn Litigation	7
	350.21550	12/30/2014	13	U	317	45.00	3.80	171.00	Research affiliates of Syngenta; pull pacer briefing. Mississippi Corn Litigation 2155 Mississippi Corn Litigation	6
	350.21330	11/16/2015	29	U	317	250.00	1.00	250.00	Research Iowa SOL tolling Syngenta Corn Litigation 2133 Syngenta Corn Litigation	50
					Subtotal for Tcode 317	Billable	11.35	1,074.50	Research	
	350.21330	11/06/2014	5	U	318	250.00	9.00	2,250.00	Reviewed filings; call with Adam Levitt; signed up clients; met with clients; reviewed news article. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	22
	350.21330	12/29/2014	5	U	318	250.00	0.80	200.00	Review of pleadings & orders from court. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	33
	350.21550	01/05/2015	13	U	318	45.00	5.50	247.50	Review depositions for info re: affiliates. Mississippi Corn Litigation 2155 Mississippi Corn Litigation	9
	350.21750	01/06/2015	1	U	318	500.00	1.50	750.00	Reviewing draft of States Conference agenda; reading Syngenta article; email to Adam. Corn Litigation MDL 2175 Corn Litigation MDL	1
	350.21330	05/15/2015	13	U	318	45.00	0.40	18.00	Review pleadings. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	35
					Subtotal for Tcode 318	Billable	17.20	3,465.50	Review	
	350.21330	04/25/2018	11	P	319	100.00	0.50	50.00	Made changes to letter to all clients; Scanned and emailed copy of same to Ben Marshall for his reference. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	60
					Subtotal for Tcode 319	Billable	0.50	50.00	Revise	
	350.21330	10/30/2014	1	U	320	500.00	0.25	125.00	Telephone conference with Tom Thrash about Louisiana farmers; then t/c with George Sneeling about Louisiana farmers. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	3
	350.21330	11/04/2014	1	U	320	500.00	0.50	250.00	Telephone conference with Tom Thrash and Paul Thompson group. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	1
	350.21420	11/05/2014	1	U	320	500.00	0.50	250.00	Telephone conference with: Conference call with Adam Levitt and Nick. Louisiana Corn Litigation 2142 Louisiana Corn Litigation	1
	350.21330	11/10/2014	1	U	320	500.00	0.75	375.00	Telephone conference with: Long t/c with Monroe Lawyer for Alton Kennedy about the corn cases. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	4
	350.21330	01/06/2015	1	U	320	500.00	0.50	250.00	Telephone conference with: On conference call with other plaintiffs' counsel regarding Lungstrum Paragraph 6 order; email to Chan ey. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	28
	350.21330	08/26/2015	13	U	320	45.00	0.50	22.50	Telephone conference regarding PFS Syngenta Corn Litigation 2133 Syngenta Corn Litigation	43
	350.21330	03/21/2017	11	U	320	100.00	0.50	50.00	Telephone conference with Tom Bender regarding speaking with PWP; emailed PWP with Tom's contact information Syngenta Corn Litigation 2133 Syngenta Corn Litigation	57
					Subtotal for Tcode 320	Billable	3.50	1,322.50	Telephone conference with	



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Fees										
	350.21420	11/18/2014	1	U	321	500.00	10.00	5,000.00	Travel: To Chicago with Nick for meeting of Plaintiff's Counsel; supper with Adam Levitt and other attys. Louisiana Corn Litigation	2
	350.21750	01/20/2015	1	U	321	500.00	8.00	4,000.00	2142 Louisiana Corn Litigation Travel to Kansas City and attendance at prehearing cocktail party and discussion with attorneys. Corn Litigation MDL	8
	350.21330	01/20/2015	5	U	321	250.00	6.00	1,500.00	2175 Corn Litigation MDL Travel to KC, meeting of counsel. Syngenta Corn Litigation	32
	350.21330	01/22/2015	5	U	321	250.00	6.25	1,562.50	2133 Syngenta Corn Litigation Travel from 1st MDL hearing in K. C. Syngenta Corn Litigation 2133 Syngenta Corn Litigation	30
	Subtotal for Tcode 321					Billable	30.25	12,062.50	Travel	
	350.21330	06/23/2017	11	U	322	100.00	1.00	100.00	Document preparation: Logged onto PACER, printed and saved Judgement & Verdict Form of the MDL and Kansas cases from Federal court; Scanned and emailed same to all attorneys in the State Farm matter Syngenta Corn Litigation 2133 Syngenta Corn Litigation	58
	Subtotal for Tcode 322					Billable	1.00	100.00	Document preparation	
Total for Fees						Billable	253.85	63,380.50		
Expenses										
	350.21330	03/12/2015	1	U	16	0.050		1.16	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437460 dated October 29, 2014, Account # 0015712081077001 Syngenta Corn Litigation	13
	350.21330	03/12/2015	1	U	16	0.050		0.12	2133 Syngenta Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437552 dated November 29, 2014, Account # 0015712081077001 Syngenta Corn Litigation	14
	350.21420	03/12/2015	1	U	16	0.050		0.02	2133 Syngenta Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437552 dated November 29, 2014, Account # 0015712081077001 Louisiana Corn Litigation	27
	350.21330	03/16/2015	1	U	16	0.050		2.51	2142 Louisiana Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437638 dated December 29, 2014, Account # 0015712081077001 Syngenta Corn Litigation	15
	350.21420	03/16/2015	1	U	16	0.050		0.23	2133 Syngenta Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437638 dated December 29, 2014, Account # 0015712081077001 Louisiana Corn Litigation	28
	350.21550	03/16/2015	1	U	16	0.050		0.06	2142 Louisiana Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437638 dated December 29, 2014, Account # 0015712081077001 Mississippi Corn Litigation	1
	350.21330	03/16/2015	1	U	16	0.050		0.81	2155 Mississippi Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437741 dated February 1, 2015, Account # 0015712081077001 Syngenta Corn Litigation	16
	350.21420	03/16/2015	1	U	16	0.050		0.17	2133 Syngenta Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437741 dated February 1, 2015, Account # 0015712081077001 Louisiana Corn Litigation	29
	350.21750	03/16/2015	1	U	16	0.050		1.59	2142 Louisiana Corn Litigation Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA	12

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Expenses	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	Ref #
								70806, Invoice #1820437741 dated February 1, 2015, Account # 0015712081077001 Corn Litigation MDL 2175 Corn Litigation MDL	
	350.21330	03/16/2015	1	U	16	0.050	0.20	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820437827 dated March 1, 2015, Account # 0015712081077001 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	17
	350.21330	07/17/2015	1	U	16	0.050	0.14	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438196 dated July 2, 2015, Account # 0015712081077001 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	18
	350.21750	07/17/2015	1	U	16	0.050	0.50	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438196 dated July 2, 2015, Account # 0015712081077001 Corn Litigation MDL 2175 Corn Litigation MDL	14
	350.21330	09/15/2015	1	U	16	0.050	0.14	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438405 dated September 1, 2015, Account # 0015712081077001 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	20
	350.21420	09/15/2015	1	U	16	0.050	0.07	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438405 dated September 1, 2015, Account # 0015712081077001 Louisiana Corn Litigation 2142 Louisiana Corn Litigation	30
	350.21750	09/15/2015	1	U	16	0.050	5.03	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438405 dated September 1, 2015, Account # 0015712081077001 Corn Litigation MDL 2175 Corn Litigation MDL	15
	350.21330	10/08/2015	1	U	16	0.050	0.38	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438526 dated October 1, 2015, Account # 0015712081077001 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	21
	350.21750	10/08/2015	1	U	16	0.050	0.03	Long Distance Charges, Cox Communications Baton Rouge II, Inc., 7401 Florida Blvd, Baton Rouge, LA 70806, Invoice #1820438526 dated October 1, 2015, Account # 0015712081077001 Corn Litigation MDL 2175 Corn Litigation MDL	16
	350.21330	11/09/2015	1	U	16	0.050	0.02	Long Distance Charges, Cox Communications Baton Rouge II, Inc. P.O. Box 60001 New Orleans LA 70160-0001 Invoice # 1802438652 dated 11/01/2015 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	22
	Subtotal for Tcode 16					Billable	0.00	13.18 Long Distance Charges,	
	350.21420	01/05/2015	1	U	102	0.250	0.75	Copies Louisiana Corn Litigation 2142 Louisiana Corn Litigation	24
	350.21330	09/15/2015	1	U	102	0.250	7.50	Copies Syngenta Corn Litigation 2133 Syngenta Corn Litigation	19
	Subtotal for Tcode 102					Billable	0.00	8.25 Copies	
	350.21330	11/07/2014	1	U	103		0.98	Postage Syngenta Corn Litigation 2133 Syngenta Corn Litigation	1
	350.21330	11/13/2014	1	U	103		1.19	Postage Syngenta Corn Litigation 2133 Syngenta Corn Litigation	2
	350.21420	11/17/2014	1	U	103		13.80	Postage Louisiana Corn Litigation 2142 Louisiana Corn Litigation	1
	350.21420	11/17/2014	1	U	103		0.69	Postage	2

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<b>Expenses</b>								
350.21420	01/05/2015	1	U	103			Louisiana Corn Litigation 2142 Louisiana Corn Litigation Postage Louisiana Corn Litigation 2142 Louisiana Corn Litigation	25
Subtotal for Tcode 103					Billable	0.00	17.14 Postage	
<b>Total for Expenses</b>					Billable	0.00	38.57	
<b>Advances</b>								
350.21750	01/28/2015	1	U	3			102.21 Auto Rental, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, charge expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	7
Subtotal for Tcode 3					Billable	0.00	102.21 Auto Rental,	
350.21420	11/19/2014	1	U	4			742.20 Commercial Plane Fare, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	9
350.21420	11/19/2014	1	U	4			25.00 Commercial Plane Fare, Excess Baggage, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	13
350.21420	11/19/2014	1	U	4			25.00 Commercial Plane Fare, Excess Baggage, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	14
350.21420	11/19/2014	1	U	4			376.60 Commercial Plane Fare, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Patrick W. Pendley, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	21
350.21750	01/28/2015	1	U	4			327.70 Commercial Plane Fare, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, charge expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	6
350.21330	01/29/2015	1	U	4			571.20 Commercial Plane Fare, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	10
Subtotal for Tcode 4					Billable	0.00	2,067.70 Commercial Plane Fare,	
350.21420	01/15/2015	1	U	13			400.00 Filing Fee, Complaint for LA Corn charged to American Express, P O Box 650448, Dallas, TX 75265-0448 on December 04, 2014 Louisiana Corn Litigation 2142 Louisiana Corn Litigation	26
Subtotal for Tcode 13					Billable	0.00	400.00 Filing Fee,	
350.21420	11/19/2014	1	U	14			203.52 Hotel, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	3
350.21420	11/19/2014	1	U	14			203.52 Hotel, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on	18

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Advances	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	Ref #
								November 18, 2014 through November 19, 2014, Patrick W. Pendley, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	
	350.21750	01/28/2015	1	U	14			190.96 Hotel, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, charge expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	1
	350.21330	01/29/2015	1	U	14			187.55 Hotel, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	4
	Subtotal for Tcode 14					Billable	0.00	785.55 Hotel,	
	350.21420	11/19/2014	1	U	17			6.29 Meals, Dinner on November 18, 2104, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, cash expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	4
	350.21420	11/19/2014	1	U	17			8.79 Meals, Lunch on November 18, 2104, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	5
	350.21420	11/19/2014	1	U	17			11.00 Meals, Breakfast on November 19, 2104, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	6
	350.21420	11/19/2014	1	U	17			17.29 Meals, Lunch on November 19, 2104, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	7
	350.21420	11/19/2014	1	U	17			2.20 Meals, Dinner on November 19, 2104, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, cash expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	8
	350.21420	11/19/2014	1	U	17			5.65 Meals, Breakfast on November 18, 2014, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, cash expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	17
	350.21420	11/19/2014	1	U	17			20.02 Meals, Lunch on November 18, 2014, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Patrick W. Pendley, cash expense, Expense Report, Check #6716 dated December 15, 2014 Louisiana Corn Litigation 2142 Louisiana Corn Litigation	19
	350.21420	11/19/2014	1	U	17			97.24 Meals, Dinner on November 18, 2014, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Patrick W. Pendley, cash expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	20
	350.21750	01/28/2015	1	U	17			71.86 Meals, Lunch on January 21, 2015, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W.	2

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<b>Advances</b>								
							Pendley, charge expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	
350.21750	01/28/2015	1	U	17		11.71	Meals, Lunch on January 20, 2015, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report, Check #7137 dated March 20, 2015 Corn Litigation MDL 2175 Corn Litigation MDL	3
350.21750	01/28/2015	1	U	17		260.49	Meals, Dinner on January 20, 2015, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, charge expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	4
350.21750	01/28/2015	1	U	17		9.46	Meals, Dinner on January 21, 2015, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report, Check #7137 dated March 20, 2015 Corn Litigation MDL 2175 Corn Litigation MDL	5
350.21330	01/29/2015	1	U	17		7.89	Meals, Lunch on January 20, 2015, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	5
350.21330	01/29/2015	1	U	17		3.19	Meals, Lunch on January 21, 2015, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	6
350.21330	01/29/2015	1	U	17		5.07	Meals, Dinner on January 21, 2015, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	7
350.21330	01/29/2015	1	U	17		4.42	Meals, Breakfast on January 22, 2015, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	8
350.21330	01/29/2015	1	U	17		11.64	Meals, Lunch on January 22, 2015, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	9
Subtotal for Tcode 17					Billable	0.00	554.21 Meals,	
350.21420	11/19/2014	1	U	20	0.600	16.20	Mileage, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, cash expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	16
350.21750	01/28/2015	1	U	20	0.600	18.00	Mileage, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report Corn Litigation MDL 2175 Corn Litigation MDL	11
350.21330	01/29/2015	1	U	20	0.600	91.80	Mileage, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, cash expense, Expense Report, Check #6922 dated February 5, 2015 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	12
Subtotal for Tcode 20					Billable	0.00	126.00 Mileage,	
350.21420	11/19/2014	1	U	22		20.00	Parking, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on	15

Date: 06/18/2018

Detail Transaction File List  
Pendley, Baudin & Coffin, L.L.P.

Page: 11

Advances	Client	Trans Date	Tmkr	H P	Tcode/ Task Code	Stmt # Rate	Hours to Bill	Amount	Ref #
								November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	
	350.21420	11/19/2014	1	U	22			20.00 Parking, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Patrick W. Pendley, cash expense, Expense Report, Check #6716 dated Deceomber 15, 2014 Louisiana Corn Litigation 2142 Louisiana Corn Litigation	22
	350.21750	01/28/2015	1	U	22			20.00 Parking, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report, Check #7137 dated March 20, 2015 Corn Litigation MDL 2175 Corn Litigation MDL	10
	350.21330	01/29/2015	1	U	22			36.00 Parking, Travel to/from Kansas City to attend the initial scheduling conference on January 20, 2015 through January 22, 2015, Nicholas R. Rockforte, charge expense, Expense Report Syngenta Corn Litigation 2133 Syngenta Corn Litigation	11
	Subtotal for Tcode 22					Billable	0.00	96.00 Parking,	
	350.21420	11/19/2014	1	U	25			61.56 Taxi, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	10
	350.21420	11/19/2014	1	U	25			19.02 Taxi, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	11
	350.21420	11/19/2014	1	U	25			16.97 Taxi, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Nicholas R. Rockforte, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	12
	350.21420	11/19/2014	1	U	25			46.09 Taxi, Travel to/from Chicago for meeting of Plaintiffs counsel to discuss the litigation and causes of action on November 18, 2014 through November 19, 2014, Patrick W. Pendley, charge expense, Expense Report Louisiana Corn Litigation 2142 Louisiana Corn Litigation	23
	Subtotal for Tcode 25					Billable	0.00	143.64 Taxi,	
	350.21750	01/28/2015	1	U	26			45.00 Tips, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report, Check #7137 dated March 20, 2015 Corn Litigation MDL 2175 Corn Litigation MDL	8
	350.21750	01/28/2015	1	U	26			10.00 Tips, Travel to/from Kansas City for initial Corn MDL status conference on January 20, 2015 through January 21, 2015, Patrick W. Pendley, cash expense, Expense Report, Check #7137 dated March 20, 2015 Corn Litigation MDL 2175 Corn Litigation MDL	9
	Subtotal for Tcode 26					Billable	0.00	55.00 Tips,	
	350.21330	01/19/2015	1	U	52	0.100		82.40 Case Cost (Pacer document management) for October 1, 2014 through December 31, 2014, Pacer Service Center, P O Box 71364, Philadelphia, PA 19176-1364, Invoice #PE0286-Q42014 dated January 7, 2015 Syngenta Corn Litigation 2133 Syngenta Corn Litigation	3
	350.21750	04/13/2015	1	U	52	0.100		22.20 Case Cost (Pacer document management) for January 1, 2015 through March 31, 2015, Pacer Service Center, P O Box 71364, Philadelphia, PA 19176-1364, Invoice #2613030-Q12015 dated April 6, 2015 Corn Litigation MDL	13

Date: 06/18/2018

Detail Transaction File List  
Pendley, Baudin & Coffin, L.L.P.

Page: 12

<u>Client</u>	<u>Trans Date</u>	<u>Tmkr</u>	<u>H P</u>	<u>Tcode/ Task Code</u>	<u>Stmt # Rate</u>	<u>Hours to Bill</u>	<u>Amount</u>	<u>Ref #</u>
<b>Advances</b>								
							2175 Corn Litigation MDL	
					Billable	0.00	104.60	Case Cost (Pacer document management)
<b>Total for Advances</b>					Billable	0.00	4,434.91	
<b>GRAND TOTALS</b>								
					Billable	253.85	67,853.98	



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 1433 N. Meridian Street  
 202  
 Indianapolis, IN 46202



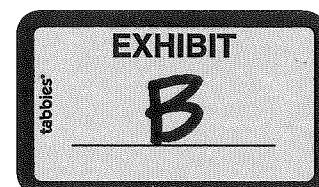
**Corn Litigation**

**Invoice 20341**

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

**In Reference To: Class Action v. Syngenta (Labor)**

<b>Date</b>	<b>By</b>	<b>Services</b>	<b>Hours</b>	<b>Rates</b>	<b>Amount</b>
10/21/2014	DM	<b>Review:</b> Review complaint and research	2.40	\$ 250.00/hr	\$ 600.00
10/21/2014	JL	<b>Research:</b> Reviewed Complaint, contacted Plaintiffs, and researched applicable law.	3.40	\$ 400.00/hr	\$ 1,360.00
10/21/2014	DM	<b>Review:</b> Review complaint and research	2.40	\$ 250.00/hr	\$ 600.00
10/21/2014	JL	<b>Research:</b> Reviewed Complaint, contacted Plaintiffs, and researched applicable law.	3.40	\$ 400.00/hr	\$ 1,360.00
11/13/2014	JL	<b>Phone Call:</b> Phone call with Ms. Brooks	0.30	\$ 400.00/hr	\$ 120.00
11/13/2014	JL	<b>Phone Call:</b> Phone call with Ms. Brooks	0.30	\$ 400.00/hr	\$ 120.00
11/14/2014	JL	<b>Draft:</b> revised complaint	0.80	\$ 400.00/hr	\$ 320.00
11/14/2014	JL	<b>Draft:</b> revised complaint	0.80	\$ 400.00/hr	\$ 320.00
11/28/2014	JL	<b>Travel:</b> drove to evansville and met with client, got tax returns and discussed the case with them generally as well as delivered them a draft copy.	6.80	\$ 400.00/hr	\$ 2,720.00
12/01/2014	JL	<b>Meeting:</b> met with Randy Bartlet and got flyers for 2015 corn seed advertisements	0.50	\$ 400.00/hr	\$ 200.00
12/01/2014	JW	<b>Review:</b> Review and revise Class Action Complaint (Nov. 16 - 4 hours); review and revise Class Action Complaint (Nov. 26 - 6 hours).	10.00	\$ 300.00/hr	\$ 3,000.00
12/01/2014	JW	<b>Review:</b> Review and revise Class Action Complaint (Nov. 16 - 4 hours); review and revise Class Action Complaint (Nov. 26 - 6 hours).	10.00	\$ 300.00/hr	\$ 3,000.00
12/01/2014	JL	<b>Meeting:</b> met with Randy Bartlet and got flyers for 2015 corn seed advertisements	0.50	\$ 400.00/hr	\$ 200.00





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## Corn Litigation

## Invoice 20341

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

12/22/2014	JL	<b>Review:</b> reviewed MDL filings, concerned about Cohen Malad complaint, called Patrick. Read Cohen Malhad complaint	1.50	\$ 400.00/hr	\$ 600.00
12/22/2014	JL	<b>Review:</b> reviewed MDL filings, concerned about Cohen Malad complaint, called Patrick. Read Cohen Malhad complaint	1.50	\$ 400.00/hr	\$ 600.00
12/23/2014	JL	<b>Review:</b> Reviewed materials from Randy Bartel about 2015 corn litigation Dupont also excludes the export warning in their 2015 product use guide page 31	0.25	\$ 400.00/hr	\$ 100.00
12/23/2014	JL	<b>Phone Call:</b> spoke with Scott Spitz about designing ads for Facebook to inform farmers	0.10	\$ 400.00/hr	\$ 40.00
12/23/2014	JL	<b>Review:</b> Reviewed materials from Randy Bartel about 2015 corn litigation	0.25	\$ 400.00/hr	\$ 100.00
		Dupont also excludes the export warning in their 2015 product use guide page 31			
01/15/2015	JL	<b>Review:</b> reviewed Defendant's proposed case management plan and brief	0.60	\$ 400.00/hr	\$ 240.00
01/15/2015	JL	<b>Review:</b> reviewed Defendant's proposed case management plan and brief	0.60	\$ 400.00/hr	\$ 240.00
02/13/2015	DM	<b>Other:</b> Farm Equipment Convention- to review advertising from syngenta and find witnesses and plaintiffs	8.00	\$ 250.00/hr	\$ 2,000.00
02/13/2015	JL	<b>Other:</b> Farm Equipment Convention	8.00	\$ 400.00/hr	\$ 3,200.00
02/13/2015	JN	<b>Other:</b> Farm Equipment Convention	8.00	\$ 300.00/hr	\$ 2,400.00
02/24/2015	JL	<b>Correspondence:</b> reviewed email form liaison counsel	0.10	\$ 400.00/hr	\$ 40.00
02/24/2015	JL	<b>Phone Call:</b> phone call with Ashlea Schwartz - find indiana class rep	0.10	\$ 400.00/hr	\$ 40.00

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## Corn Litigation

## Invoice 20341

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

02/24/2015	JL	<b>Phone Call:</b> phone call with David about finding Indiana corn rep	0.10	\$ 400.00/hr	\$ 40.00
02/24/2015	JL	<b>Correspondence:</b> reviewed email from liaison counsel	0.10	\$ 400.00/hr	\$ 40.00
02/24/2015	JL	<b>Phone Call:</b> phone call with Ashlea Schwartz - find indiana class rep	0.10	\$ 400.00/hr	\$ 40.00
02/24/2015	JL	<b>Phone Call:</b> phone call with David about finding Indiana corn rep	0.10	\$ 400.00/hr	\$ 40.00
02/25/2015	DM	<b>Phone Call:</b> Talking to Jason Summers, potential plaintiff	0.40	\$ 250.00/hr	\$ 100.00
02/25/2015	DM	<b>Review:</b> Reviewing docs related to litigation, news articles, and reviewing current filings	0.20	\$ 250.00/hr	\$ 50.00
02/25/2015	DM	<b>Phone Call:</b> Talking to plaintiff Joe Goode	0.50	\$ 250.00/hr	\$ 125.00
02/25/2015	DM	<b>Phone Call:</b> Talking to Jason Summers, potential plaintiff	0.40	\$ 250.00/hr	\$ 100.00
02/25/2015	DM	<b>Review:</b> Reviewing docs related to litigation, news articles, and reviewing current filings	0.20	\$ 250.00/hr	\$ 50.00
02/25/2015	DM	<b>Phone Call:</b> Talking to plaintiff Joe Goode	0.50	\$ 250.00/hr	\$ 125.00
03/04/2015	DM	<b>Phone Call:</b> Talking to Corn Farmers to sign them up, Nick Frazer	0.60	\$ 250.00/hr	\$ 150.00
03/04/2015	DM	<b>Phone Call:</b> Talking to Justin Gamblin, potential plaintiff, Kentucky	0.40	\$ 250.00/hr	\$ 100.00
03/04/2015	DM	<b>Phone Call:</b> Talking to potential Plaintiff Adam, Wisconsin	0.30	\$ 250.00/hr	\$ 75.00
03/04/2015	DM	<b>Phone Call:</b> Conference call between Ashlea, Rick, and Adam (potential Client)	0.30	\$ 250.00/hr	\$ 75.00
03/04/2015	DM	<b>Phone Call:</b> Talking to Corn Farmers to sign them up, Nick Frazer	0.60	\$ 250.00/hr	\$ 150.00

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## Corn Litigation

## Invoice 20341

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

03/04/2015	DM	<b>Phone Call:</b> Talking to Justin Gamblin, potential plaintiff, Kentucky	0.40	\$ 250.00/hr	\$ 100.00
03/04/2015	DM	<b>Phone Call:</b> Talking to potential Plaintiff Adam, Wisconsin	0.30	\$ 250.00/hr	\$ 75.00
03/04/2015	DM	<b>Phone Call:</b> Conference call between Ashlea, Rick, and Adam (potential Client)	0.30	\$ 250.00/hr	\$ 75.00
03/11/2015	JL	<b>Review:</b> read proposed order on class wide complaint and counts.	0.20	\$ 400.00/hr	\$ 80.00
03/11/2015	JL	<b>Review:</b> read proposed order on class wide complaint and counts.	0.20	\$ 400.00/hr	\$ 80.00
03/13/2015	JL	<b>Review:</b> reviewed email from liaison counsel	0.10	\$ 400.00/hr	\$ 40.00
03/13/2015	JL	<b>Review:</b> reviewed email from liaison counsel	0.10	\$ 400.00/hr	\$ 40.00
06/08/2015	JL	<b>Research:</b> reviewed last week's emails from Ashley S. looked at advantages of opting into master complaint, chances of prevailing on Indiana claims that would have to be waived by adopting master complaint	1.20	\$ 400.00/hr	\$ 480.00
06/08/2015	JL	<b>Research:</b> reviewed last week's emails from Ashley S. looked at advantages of opting into master complaint, chances of prevailing on Indiana claims that would have to be waived by adopting master complaint	1.20	\$ 400.00/hr	\$ 480.00
06/09/2015	JL	<b>Phone Call:</b> called Steve Six for advice on master complaint	0.10	\$ 400.00/hr	\$ 40.00
06/09/2015	JL	<b>Phone Call:</b> called Steve Six for advice on master complaint	0.10	\$ 400.00/hr	\$ 40.00
06/10/2015	JL	<b>Draft:</b> drafted notice to conform to master complaint	0.40	\$ 400.00/hr	\$ 160.00
06/10/2015	JL	<b>Draft:</b> drafted notice to conform to master complaint	0.40	\$ 400.00/hr	\$ 160.00

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 Indianapolis, IN 46202



**Corn Litigation**

**Invoice 20341**

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

06/11/2015	JL	<b>Phone Call:</b> two phone calls with Rachel S. at Steve Six's firm about the master complaint and how to file it... notice of conforming needs to be filed twice	0.30	\$ 400.00/hr	\$ 120.00
06/11/2015	JL	<b>Phone Call:</b> two phone calls with Rachel S. at Steve Six's firm about the master complaint and how to file it... notice of conforming needs to be filed twice	0.30	\$ 400.00/hr	\$ 120.00
06/22/2015	JL	<b>Correspondence:</b> read email from Emily Rubino about Plaintiff's fact sheet	0.10	\$ 400.00/hr	\$ 40.00
06/22/2015	JL	<b>Correspondence:</b> responded to emily rubino's email about Plaintiff fact sheet	0.10	\$ 400.00/hr	\$ 40.00
06/22/2015	JL	<b>Correspondence:</b> read email from Emily Rubino about Plaintiff's fact sheet	0.10	\$ 400.00/hr	\$ 40.00
06/22/2015	JL	<b>Correspondence:</b> responded to emily rubino's email about Plaintiff fact sheet	0.10	\$ 400.00/hr	\$ 40.00
09/10/2015	DM	<b>Correspondence:</b> Spoke with plaintiff regarding discovery requested.	1.50	\$ 250.00/hr	\$ 375.00
09/10/2015	DM	<b>Correspondence:</b> Spoke with plaintiff regarding discovery requested.	1.50	\$ 250.00/hr	\$ 375.00
09/13/2015	DM	<b>Correspondence:</b> Spoke with plaintiff regarding discovery requested.	1.10	\$ 250.00/hr	\$ 275.00
09/14/2015	SCP	<b>Other:</b> Scanning documentation to responsive document request	0.60	\$ 125.00/hr	\$ 75.00
09/14/2015	SCP	<b>Other:</b> Scanning documentation to responsive document request	0.60	\$ 125.00/hr	\$ 75.00
09/16/2015	DM	<b>Other:</b> Follow up discovery requests.	0.60	\$ 225.00/hr	\$ 135.00
09/16/2015	DM	<b>Review:</b> Reviewed common fund order Document 935	0.50	\$ 250.00/hr	\$ 125.00
09/16/2015	DM	<b>Other:</b> Follow up discovery requests.	0.60	\$ 250.00/hr	\$ 150.00

**In Reference To: Class Action v. Syngenta (Expenses)**

**Saeed and Little, LLP**  
 1433 N. Meridian Street  
 202  
 Indianapolis, IN 46202



**Corn Litigation**

**Invoice 20341**

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

<b>Date</b>	<b>By</b>	<b>Expenses</b>	<b>Amount</b>
12/30/2014	JL	<b>Travel/Lodging:</b> flight to kansas city for MCL on January 20 2015	\$ 202.00
02/27/2015	DM	<b>Meal:</b> Food at the Farm Equipment Show	\$ 18.75
02/27/2015	DM	<b>Meal:</b> Meal at Farm Equipment Convention	\$ 21.00
02/27/2015	DM	<b>Travel/Lodging:</b> Fuel driving to Louisville for the Farm Equipment Show	\$ 34.07
02/27/2015	DM	<b>Miscellaneous:</b> Advertisement for Sagamore paper	\$ 426.30

<b>Total Hours</b>	88.40 hrs
<b>Total Labor</b>	\$ 28,615.00
<b>Total Expenses</b>	\$ 702.12
<b>Total Invoice Amount</b>	\$ 29,317.12
<b>Previous Balance</b>	\$ 0.00
<b>Balance (Amount Due)</b>	\$ 29,317.12

**Saeed and Little, LLP**  
 1433 N. Meridian Street  
 202  
 Indianapolis, IN 46202



**Corn Litigation**

**Invoice 20341**

<b>Date</b>	Jun 11, 2018
<b>Terms</b>	
<b>Service Thru</b>	Jun 11, 2018

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**User Hours Summary**

**Billing Period: 10/21/2014 - 06/11/2018**

**User Hour Totals**

<b>User</b>	<b>Hours Billed</b>	<b>Rate/Hour</b>	<b>Amount Billed</b>
David Miller	0.60	\$225.00	\$135.00
David Miller	23.40	\$250.00	\$5,850.00
Jonathan Little	35.20	\$400.00	\$14,080.00
Jessica Wegg	20.00	\$300.00	\$6,000.00
Jeff Neuenschwander	8.00	\$300.00	\$2,400.00
S&L C Paralegal	1.20	\$125.00	\$150.00

*Licensed and  
practicing law in the  
following states:*

ARKANSAS  
LOUISIANA  
MISSISSIPPI  
TEXAS

BENJAMIN F. MARSHALL, IV & ASSOCIATES, L.L.C.  
1810 Roselawn Avenue  
Monroe, Louisiana 71201

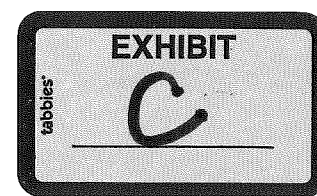
Telephone: (318) 361-0061  
Facsimile: (318) 361-0062

July 10, 2018

Re: Syngenta Corn Litigation Billable Hours covering from 11/15/14 to 7/10/18

Meeting with farmer to discuss corn litigation; Travel to Kansas City and attendance at prehearing party and discussion with attorneys; Corn Litigation MDL; 2175 Corn Litigation MDL; Travel from 1<sup>st</sup> MDL hearing in K.C. Syngenta Corn Litigation; 2133 Syngenta Corn Litigation; Made changes to letter to all clients; 2133 Syngenta Corn litigation; Miscellaneous – corrections to complaint Louisiana Corn Litigation; 2142 Louisiana Corn Litigation; Miscellaneous – corrections to complaint Louisiana Corn Litigation; 2142 Louisiana Corn Litigation; Miscellaneous – Research, drafted complaint, communication with other lawyers; 2133 Syngenta Corn Litigation; Sent emails to clients; Sent emails to all local counsel about the current happenings in corn and Syngenta “release” issue; Emailed complaints to attorneys; 2142 Louisiana Corn Litigation; Drafted complaint Louisiana Corn Litigation; Drafted pleading Louisiana Corn Litigation; Drafted updated letter post MDL to all clients notifying them of upcoming class notice; Drafted a letter to all N.E. LA and Ark Rice clients concerning the upcoming corn litigation; Review case files for contracts/web site claim forms; 2133 Syngenta Corn Litigation; Post MDL calls to producers and/or meetings with corn producers including: 4D Farms of Pioneer, Alan Williams Farms, Alex Scott Williams, B&B, Bundrick Farm Partnership, C&S Farms, Caney Bayou Farms, Charles M. Costello Farms, Costello Farming Partnership, Clay Costello, Courtney Costello, Lindsey Costello, Tracey Costello, Christina and Elliott Colvin, Coaches Brake Farms, Coleman Farms, Craftco, D&R Farming Co, Dale Harris, Dan Barr, Don Harris, Drurey Partnership, Elliot Bros Partnership, Fairchild Trust, James Wheeler Farms, Jeffrey Morris, John & Teresa Hopkins Farm Partnership, John A. Crymes Farms, Kenneth Fairchild, Kevin Key, Kristina Liles Farm, Larry Dean Williams, Little Creek Farms, Michael Elliot, Michael Liles, Patricia Bordelon, Reba Sharplin, Ricky McIntyre, Ross Planting Co, Scott Williams Farms, Sunny Side Farms, Three Rivers Farm, Inc., Tim Sharplin, Ty Rogers, Vendal Fairchild, and Zeb Benton; Receipt and review of daily emails from Kansas City MDL: correspondence and meetings with Marksville lawyer regarding claims.

100 hrs at \$250.....\$25,000



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

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IN RE SYNGENTA AG MIR162 CORN  
LITIGATION

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

THIS DOCUMENT RELATES TO:

MDL No. 2591

ALL CASES

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DECLARATION OF PATRICK W. PENDLEY, ESQ. FOR PENDLEY, BAUDIN &  
COFFIN, L.L.P.

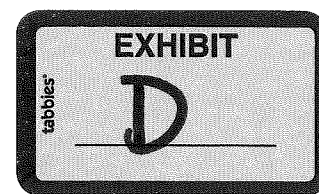
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STATE OF LOUISIANA

PARISH OF IBERVILLE

I, Patrick W. Pendley, Esq., declare as follows:

1. I am over the age of 21 years 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 Senior Partner of Pendley, Baudin & Coffin, L.L.P. ("PBC"), I am authorized to submit this declaration on behalf of PBC.
3. I submit this declaration in support of PBC's fee and expense application filed pursuant to Section 7.2.1 of the Agrisure Viptera/Duracade Class Settlement Agreement in *In Re Syngenta AG MIR162 Corn Litigation*, a Multidistrict Litigation consolidated in the United State District Court for the District of Kansas before Honorable John W. Lundstrum (MDL-2591).
4. PBC represents 19 filed plaintiffs in this MDL litigation against Syngenta on a contingency fee basis. Additionally, PBC represents 39 plaintiffs who are class members. Generally, each of these clients agreed to written contingent fee agreements ranging from thirty-three and one-third (33 1/3) to forty (40) percent of any recovery in this matter, plus expense reimbursement. As these were contingent fee agreements, PBC advanced court costs and litigation expenses and would only be compensated if the clients recovered money.

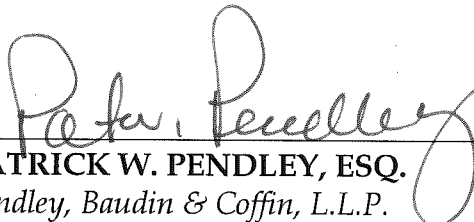




5. Our firm routinely maintains time records of all litigation we are involved in and the attached accounting of time and expenses is accurate to the best of my knowledge, information and belief. It is not the intention of PBC to "double collect" on its time or expenses in this matter and any time and expenses which are paid as common benefit will be subtracted from the amount due from each client under the Private Fee Contract.
6. I was admitted to the Louisiana State Bar Association in 1967 and have 51 years of experience practicing law. I have been involved in class actions and mass joinders in the states of, inter alia, Washington, Oregon, California, Kansas, Oklahoma, Texas, Louisiana, Arkansas, Missouri, Mississippi and Virginia, over the course of my legal career. I served one term as Vice President of the Louisiana Trial Lawyers Association. I have been recognized as a Louisiana Super Lawyer since 2008.
7. PBC has spent a total of 253.85 hours on this litigation, which equates to \$63,380.50 at our usual and customary hourly rates.
8. The firm also incurred \$4,494.31 in expenses.

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

Executed on this 10<sup>th</sup> day of July, 2018 in Plaquemine, Louisiana.

  
\_\_\_\_\_  
**PATRICK W. PENDLEY, ESQ.**  
*Pendley, Baudin & Coffin, L.L.P.*  
24110 Eden Street  
Post Office Drawer 71  
Plaquemine, Louisiana 70765-0071  
[pwpendley@pbclawfirm.com](mailto:pwpendley@pbclawfirm.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

IN RE SYNGENTA AG MIR162 CORN  
LITIGATION

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

THIS DOCUMENT RELATES TO  
ALL CASES EXCEPT:

MDL No. 2591

*Louis Dreyfus Company Grains  
Merchandising LLC v. Syngenta AG,  
et al., No. 16-2788-JWL-JPO*

*Trans Coastal Supply Company, Inc. v.  
Syngenta AG, et al., No. 2:14-cv-02637-  
JWL-JPO*

*The Delong Co., Inc. v. Syngenta AG et  
al., No. 2:17-cv-02614-JWL-JPO*

*Agribase International Inc. v. Syngenta  
AG, et al., No. 2:15-cv-02279-JWL-JPO*

**DECLARATION OF DAVID E. MILLER, JONATHAN LITTLE AND JESSICA WEGG  
OF SAEED AND LITTLE**

We, David E. Miller, Jonathan Little and Jessica Wegg declare as follows:

1. We are attorneys at Saeed & Little LLP ("Saeed & Little") based in Indianapolis, Indiana. Based on our positions with the firm, we are authorized to submit this declaration.
2. We make this declaration based on our personal knowledge and if called to testify to the contents hereof, we could and would competently do so.
3. The attorneys at Saeed & Little are highly experienced in consumer protection cases, including, consumer class actions, human trafficking class cases, consumer collection defense, mortgage foreclosure defense, Fair Debt Collection Practices Act violations and Telephone Consumer Protection Act. Our attorneys have served clients in an individual capacity



in consumer protections cases, and have successfully pursued class action cases against large financial institutions for consumer law violations

4. I, Jon Little have been practicing law for 11 years. I have tried dozens of jury trials in several states. I have been admitted to the bars of New York, Arizona, Indiana, and Illinois as well as the bars of several Federal District Courts and the Courts of Appeal for the Seventh and Ninth Circuits.

5. I litigated numerous cases, including class cases, for young athletes sexually abused by their coaches in USA Swimming, USA Gymnastics, USA Fencing, USA Taekwondo, and the United States Olympic Committee.

6. I, Jessica Wegg have been practicing law since 2009. I have argued and briefed several appellate cases in the Seventh and Ninth Circuit, as well as the Indiana Supreme Court and Indiana Court of Appeals. I am admitted in Illinois, Indiana and the Law Society of Upper Canada (Ontario). I am also admitted to the US Supreme Court, the Seventh Circuit Court of Appeals and several United States Federal District Courts.

7. I have litigated numerous cases, including class cases, across the United States and Canada for athletes sexually abused by their coaches. I was the source to the Indianapolis Star that exposed Dr. Larry Nassar's violations of hundreds of children at Michigan State.

8. I grew up in a farming community and my connections were vital in obtaining clients for this litigation.

9. I, David Miller am a partner at Saeed & Little LLP. I am admitted to the State Bars of California, Indiana, New York, as well as the Law Society of Upper Canada (Ontario).

10. I have litigated class actions against Narconon, Blue Cross Blue Shied, and Syngenta.

11. I grew up in a farming community and my connections were vital in obtaining clients for this litigation.

12. I have been named a Super Lawyer in Indiana in 2016 and 2017.

13. Saeed & Little LLP utilizes Bill4Time to track all work conducted during litigation on behalf of our clients in the normal course of business. Our time was maintained throughout the course of this litigation through this method.

14. As part of the preparation of this declaration, we re-reviewed all of the time entries and expenses previously submitted in this litigation to exercise billing judgment.

15. We have a total of 83.7 hours of time on this case, totaling \$27,440.

16. We have incurred \$702 in expenses in this case.

17. After this re-review, we can confirm that this time was undertaken by the members of Saeed & Little. We believe that the common benefit time and expense information submitted on behalf of Saeed & Little is accurate and in compliance with the Court's Common Benefit Order.

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

Executed on this 10 day of July, 2018, in Indianapolis, Indiana

/s/ Jessica Wegg  
Jessica Wegg  
Saeed & Little, LLP  
1433 N. Meridian Street  
Indianapolis, Indiana 46202  
(317)721-7214  
[jessica@sllawfirm.com](mailto:jessica@sllawfirm.com)

/s/ Jonathan Little

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Jonathan Little – Partner  
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(317)721-7214  
[jon@slawfirm.com](mailto:jon@slawfirm.com)

/s/ David E. Miller

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David E. Miller – Partner  
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(317)721-7214  
[david@slawfirm.com](mailto:david@slawfirm.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

IN RE SYNGENTA AG MIR162 CORN  
LITIGATION

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

THIS DOCUMENT RELATES TO:

MDL No. 2591

ALL CASES

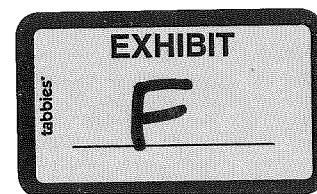
DECLARATION OF BENJAMIN F. MARSHALL, IV, ESQ. FOR BENJAMIN F.  
MARSHALL, IV & ASSOCIATES, LLC

STATE OF LOUISIANA

PARISH OF OUACHITA

I, Benjamin F. Marshall, IV, Esq., declare as follows:

1. I am over the age of 21 years 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 Senior Partner of Benjamin F. Marshall, IV & Associates, LLC, I am authorized to submit this declaration on behalf of Benjamin F. Marshall, IV & Associates, LLC.
3. I submit this declaration in support of Benjamin F. Marshall, IV & Associates, LLC's fee and expense application filed pursuant to Section 7.2.1 of the Agrisure Viptera/Duracade Class Settlement Agreement in *In Re Syngenta AG MIR162 Corn Litigation*, a Multidistrict Litigation consolidated in the United State District Court for the District of Kansas before Honorable John W. Lundstrum (MDL-2591).
4. Benjamin F. Marshall, IV & Associates, LLC represents 48 plaintiffs in this MDL litigation against Syngenta on a contingency fee basis. Generally, each of these clients agreed to written contingent fee agreements ranging from thirty-three and one-third (33 1/3) to forty (40) percent of any recovery in this matter, plus expense reimbursement. As these were contingent fee agreements, Benjamin

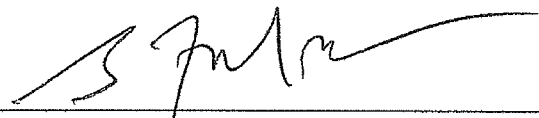


F. Marshall, IV & Associates, LLC advanced court costs and litigation expenses and would only be compensated if the clients recovered money.

5. Our firm routinely maintains time records of all litigation we are involved in and the attached accounting of time and expenses is accurate to the best of my knowledge, information and belief. It is not the intention of Benjamin F. Marshall, IV & Associates, LLC, to "double collect" on its time or expenses in this matter and any time and expenses which are paid as common benefit will be subtracted from the amount due from each client under the Private Fee Contract.
6. I was admitted to the Louisiana State Bar Association in 1984 and have 34 years of experience practicing law. I have been involved in class actions and mass joinders in the states of, inter alia, Louisiana and Arkansas, over the course of my legal career.
7. Benjamin F. Marshall, IV & Associates, LLC has spent a total of 100 hours on this litigation, which equates to \$25,000.00 at our usual and customary hourly rates.
8. The firm also incurred nominal expenses which we waive.

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

Executed on this 10<sup>th</sup> day of July, 2018 in Monroe, Louisiana.



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**BENJAMIN F. MARSHALL, IV, ESQ.**  
Benjamin F. Marshall, IV & Associates, LLC  
1810 Roselawn Avenue  
Monroe, Louisiana 71201