

**4IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

**In Re: Syngenta AG MIR162
Corn Litigation**

MDL No. 2591

Case No. 2:14-md-2591-JWL-JPO

This document relates to:

Gauntt v. Syngenta Seeds, Inc., et al.
4:17-cv-05166-TOR

MOTION FOR AN AWARD OF ATTORNEYS' FEES AND COSTS

Pursuant to the Court’s Order Preliminarily Approving the Settlement Between Class Plaintiffs and the Syngenta Defendants, Provisionally Certifying the Settlement Class, Approving Settlement Class Counsel Subclass Counsel, and Class Representatives, Approving the Notice Plan, and Authorizing Dissemination of Notice, Appointing the Notice Administrator and Claims Administrator and Special Masters, and Setting a Schedule for the Final Approval Process (ECF No. 3532) and the Agrisure Viptera/Duracade Class Settlement Agreement (ECF No. 3507-2 at ¶7.2.1), the undersigned counsel for Plaintiff, Chep R. Gauntt, who has filed a Class Action Complaint individually and on behalf of all similarly situated (hereinafter collectively referred to as the “Washington Class”), moves this Court for an award of attorneys’ fees and expenses incurred in pursuing the Class Action Claim against the defendants.

As set forth in the accompanying Memorandum and Declaration of James S. Rogers, since July 2017, the undersigned counsel has advanced \$19,709.12 and expended a total of 48.3 hours (not including associate attorneys' and paralegal's time) in litigating this matter on behalf of the Washington Class, all of which were performed for the benefit of the Washington Class/Class Members.

The total number of hours expended by the undersigned counsel and the undersigned counsel's hourly rate of \$750.00 are reasonable given his extensive experience as a trial lawyer in complex litigation and the complexity of issues presented in this action. Accordingly, the undersigned counsel respectfully requests that the Court grant his request for an award of attorneys' fees and expenses in the total amount of \$55,934.12.

Respectfully Submitted this the 10th day of July, 2018.

LAW OFFICES OF JAMES S. ROGERS

s/ James S. Rogers

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this court.

LAW OFFICES OF JAMES S. ROGERS

s/ James S. Rogers
James S. Rogers, WSBA # 5335
Attorney for Plaintiff