

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

**IN RE SYNGENTA AG MIR162
CORN LITIGATION**

**THIS DOCUMENT RELATES TO
ALL CASES EXCEPT:**

*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*

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

MDL No. 2591

**SUPPLEMENT TO WAGSTAFF & CARTMELL LLP'S
MOTION FOR ATTORNEYS FEES AND EXPENSES
FOR INDIVIDUAL CLIENT REPRESENTATION**

Wagstaff & Cartmell, LLP ("W&C"), submits this Supplement to its previously submitted Motion for Attorneys Fees and Expenses For Individual Client Representation [Doc. 3594] dated July 10, 2018, in response to the Court's Order Regarding Attorney Fee Submissions [Doc. 3613].

In accordance with this Order, W&C attaches as Exhibit A and B, printouts of the spreadsheets in PDF form requested by the Court Summarizing W&C's Fees and Expenses, respectively. These pertain only to W&C's representation of its 704 individual producer plaintiffs in the Minnesota state court litigation and in assisting those clients in the settlement claims submission process. Electronic copies of these spreadsheets in Excel format will be emailed separately to the Special Master in accordance with the Court's Order.

The attached Exhibit A identifies and categorizes W&C's request for \$1,257,451.00 in fees. These fees include an additional \$62,817.50 representing work done in the month of July 2018 to further assist W&C's clients in perfecting their claims submissions, and fees for work on the preparation of W&C's fee petition. The attached Exhibit B identifies and categorizes W&C's for \$15,914.45 in expenses, which includes an additional \$937.40 incurred as W&C's database fee for July 2018.

This Motion is filed contemporaneously in Hennepin County District Court, *In Re: Syngenta Litigation*, File Nos.: 27-CV-15-3785 and 27-CV-15-12625.

Date: August 3, 2018

WAGSTAFF & CARTMELL LLP

/s/ Eric D. Barton

Thomas P. Cartmell (KS# 17020)

Tyler W. Hudson (KS #20293)

Eric D. Barton (KS# 16503)

*Counsel for 704 Minnesota Plaintiffs and
Member, Plaintiff's Executive Committee,
Minnesota Consolidated Action*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on August 3, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record.

/s/ Eric D. Barton

Eric D. Barton

Exhibit A

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
Complaint drafting	Attorneys			47.40	\$29,625.00	
	Contract Attorneys					
	Non-attorneys			51.10	\$12,775.00	
Dipositive motion briefing/argument	Attorneys			2.50	\$1,562.50	
	Contract Attorneys					
	Non-attorneys					
Class certification motion briefing and argument	Attorneys					
	Contract Attorneys					
	Non-attorneys					
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys					
	Contract Attorneys					
	Non-attorneys			21.90	\$5,475.00	
Paper discovery (Syngenta and third parties)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs	Attorneys			1.30	\$812.50	
	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and communications with adverse parties	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Fact depositions (Syngenta and third parties)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Defend fact depositions (of plaintiffs)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Discovery file management	Attorneys					
	Contract Attorneys					
	Non-attorneys					
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys			23.70	\$14,812.50	
	Contract Attorneys					
	Non-attorneys					
Defendant expert witness work (depositions)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Daubert motion practice (plaintiff experts)	Attorneys					
	Contract Attorneys					
	Non-attorneys					

Daubert motion practice (defense experts)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial (presenting witnesses and argument)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Trial briefing and jury instructions	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Other pretrial motion practice	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Post-trial briefing	Attorneys					
	Contract Attorneys					
	Non-attorneys					
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients	Attorneys			32.00	\$20,000.00	
	Contract Attorneys					
	Non-attorneys			176.10	\$44,025.00	
Settlement negotiations	Attorneys					
	Contract Attorneys					
	Non-attorneys			1.20	\$300.00	
Assisting clients in perfecting claims in settlement	Attorneys			52.30	\$15,537.50	
	Contract Attorneys					
	Non-attorneys			541.00	\$120,688.50	
Preparation of fee petition	Attorneys			43.00	\$26,875.00	
	Contract Attorneys					
	Non-attorneys			118.10	\$29,525.00	
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys					
	Contract Attorneys					
	Non-attorneys					
OTHER (describe in Notes)						
	Attorneys			3.40	\$1,275.00	Initial client intake, assesment and file creation/management.
	Contract Attorneys					
	Non-attorneys			1031.40	\$257,850.00	
	Attorneys			830.80	\$502,200.00	Legal research and development of overall legal strategy.
	Contract Attorneys					
	Non-attorneys			63.60	\$15,900.00	

	Attorneys			259.50	\$158,137.50	Informational meeting and communications with clients, prospective clients and
	Contract Attorneys					
	Non-attorneys			0.30	\$75.00	
TOTAL				3300.60	\$1,257,451.00	

NOTE: This submission includes additional fees of \$62,817.50 incurred during July 2018. These fees include continued assistance to clients in perfecting their claim submissions and preparation of our fee petition.

Exhibit B

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$20.11	
Photocopying		
Hotels		
Meals		
Mileage		
Air Travel		
Court Fees	\$5,546.00	
Transcript Fees		
Groud Transportation	\$40.00	
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)	\$4,085.90	Process Service
	\$6,108.65	Database - document processing and hosting fees
	\$113.79	Legal Research - Westlaw
TOTAL	\$15,914.45	

NOTE: This submission includes additional expenses of \$ 937.40 incurred during July 2018. These expenses include monthly database hosting fees for the month of July, 2018.