

**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)	

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

Wright & Schulte, LLC by itself and jointly with other law firms (collectively, “WS Law” or the “Firm”), on behalf of the Firm and the Firm’s clients (the “WS Plaintiffs”) (collectively, “Movants”), pursuant to this Court’s Order Preliminarily approving the class action settlement in this case and dated April 10, 2018 [Doc. 2591] and Federal Rule of Civil Procedure 23 and hereby submits its Motion for Award of Attorneys’ Fees and Reimbursement of Costs. Movants seek payment of the contractually agreed upon fees and expense reimbursement between all WS Plaintiffs and the Firm from any fund created to pay attorneys’ and expenses arising out of the recently preliminarily approved class action in the Syngenta Litigation (the “Fund”). In the alternative, Movants seek payment from the Fund of the Firm’s reasonable

hourly fees and costs incurred in the prosecution of this action. It is our understanding that the Hennepin County (Minnesota) District Court will retain jurisdiction over these issues. However, we are filing this pleading jointly in the United States District Court of Kansas (Case No. 2:14-md-02591) and in the Hennepin County District Court (File No. 27-CV-15-3785) because our Firm has received little to no guidance from the Court or Plaintiffs' leadership as to the proper filing of this brief concerning the contingent fee agreements with our 1049 clients.

This Motion for Award of Attorneys' Fees and Reimbursement of Costs is supported by the accompanying memorandum of law, the Declaration of counsel, Richard W. Schulte ("Schulte Decl."), the declarations of other Attorneys that assisted with the representation of WS Plaintiffs during the Syngenta Corn litigation, along with corresponding time sheets, invoice of costs, and other documents. Fees and costs are sought for the entirety of representation. Through its representation thus far, **the Firm has expended 5702.3 hours of time, for a total of \$1,875,470.00 in attorneys' fees, and incurred costs in the amount of \$62,936.82. for the Firm's 1049 clients.**

Dated: July 7, 2018

Respectfully Submitted

/s/ Richard W. Schulte
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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 7th day of July 2018.

/s/ Richard W. Schulte
Richard W. Schulte (0066031)