

**STATE OF MINNESOTA**

**DISTRICT COURT**

**COUNTY OF HENNEPIN**

**FOURTH JUDICIAL DISTRICT**

In re: Syngenta Litigation and  
Syngenta Class Action Litigation

Case Type: Civil Other  
Honorable Laurie J. Miller

This Document Relates to:  
**INDIVIDUAL CLAIMS  
CLASS ACTION**

Court File Nos.: 27-CV-15-3785 and  
27-CV-15-12625

**DECLARATION OF PATRICK DENNIS IN SUPPORT OF MINNESOTA CO-  
LEAD COUNSEL'S SUPPLEMENT TO THE JOINT MOTION FOR APPROVAL  
OF COMMON BENEFIT AWARDS**

I, Patrick Dennis declare and state as follows:

1. I am a Partner at the law firm of Doyle LLP and am duly authorized by the owners, managers, or board of directors of the firm to make this declaration on its behalf.

2. I submit this declaration in support of my firm's contribution to Minnesota Co-Lead Counsel's Joint Motion for Approval of Common Benefit Awards (the "Motion"). I have personal knowledge of the matters set forth in this declaration, and, if called as a witness, could and would testify competently thereto.

3. Attached as Exhibit A to this Declaration is the Court Ordered supplemental spreadsheet as required by the MDL Court's July 18, 2018 Order Regarding Attorney Fee Submissions. ECF 3613.

4. In order to complete the spreadsheet attached as Exhibit A, my firm reviewed our time and expenses in this case and categorized the time and expenses in the manner required by the July 18, 2018 Order.

5. In the “Approved Common Benefit Work” column, I included only the time which was approved by Co-Lead Counsel through its audit process and submitted as PFS Common Benefit time or Bellwether Common Benefit time at Exhibit 14 to Mr. Gustafson’s Declaration in support of the Motion. I included any other work not previously submitted as common benefit time with the appropriate category designation, but in the column marked “Other Work.”

6. I can confirm that this time was undertaken by members of my firm at my direction. I believe that the time information submitted on behalf of my firm in the attached Exhibit A is accurate and complies with the MDL Court’s July 18 Order.

7. None of my firm’s expenses were submitted as Common Benefit expenses as part of the Motion. Nonetheless, I included my relevant expenses on the attached Exhibit A.

7. My firm’s listed expenses pertaining to this case are contemporaneously prepared from receipts, expense vouchers, check and credit card records, and other documents and are an accurate record of such expenses. The expense information submitted on behalf of my firm in the attached Exhibit A is accurate and complies with the MDL Court’s July 18 Order.

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

Executed on this 27th day of July, 2018 in Houston, Texas.



Patrick Dennis

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
Complaint drafting	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Dipositive motion briefing/argument	Attorneys					
	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	199.4/19.3	\$425/\$450			
	Contract Attorneys					
	Non-attorneys	403.40	\$150.00			
Paper discovery (Syngenta and third parties)	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Paper discovery against plaintiffs	Attorneys					
	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					
	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 intructions	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					
	Contract Attorneys					
	Non-attorneys					
Settlement negotiations	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Preparation of fee petition	Attorneys					
	Contract Attorneys					
	Non-attorneys					
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys					
	Contract Attorneys					

Requesting	Non-attorneys					
	OTHER (describe in Notes)					
	Attorneys					
	Contract Attorneys					
	Non-attorneys					

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		1,603.13
Photocopying		
Hotels		1,749.26
Meals		2,082.21
Mileage		
Air Travel		2,247.77
Court Fees		5,046.94
Transcript Fees		
Groud Transportation		696.93
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe) Lexis/Nexis & Webcast Meeting		337.11
TOTAL		13,763.35