

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

SUPPLEMENT TO PLAINTIFFS' MOTION FOR AWARD OF ATTORNEY FEES

Kemp, Jones & Coulthard, LLP ("KJC"), on behalf of certain individual Producer Plaintiffs ("Plaintiffs"),¹ hereby supplements their Motion for Award of Attorney Fees, filed on July 10, 2018 ("Motion"), in compliance with the Honorable Judge Lungstrum's order entered on July 18, 2018 ("Supplementation Order"). Attached hereto as Exhibit A is the Court-ordered supplemental spreadsheet required by the Supplementation Order as it relates to the Motion, which includes only the non-Common Benefit time expended by KJC and its Iowa co-counsel, Willson & Pechacek, PLC ("W&P").² Because the Motion does not seek reimbursement of any expenses, Exhibit A includes only the time-related sheet from the template provided with the Supplementation Order. As required by the

¹ The moving Plaintiffs' individual actions, which were consolidated with this action, have the following case numbers: 27-CV-15-20022; 27-CV-15-20024; 27-CV-15-20025; 27-CV-15-20028; 27-CV-15-20029; 27-CV-15-20031; 27-CV-15-20032; 27-CV-15-20033; 27-CV-15-20034; 27-CV-15-20035; 27-CV-15-20036; 27-CV-15-20038; 27-CV-15-20041; 27-CV-15-20042; and 27-CV-16-8966.

² KJC has provided the Bassford Remele firm with a separate supplemental spreadsheet breaking down KJC's Common Benefit time, which KJC understands the Minnesota Co-Lead Counsel will file with the Court.

Supplementation Order, Plaintiffs have concurrently provided Exhibit A via email to Special Masters Ellen K. Reisman and John B. Van de North.

In the interests of full disclosure and to avoid causing any confusion for the Court or the Special Masters, KJC performed (1) Common Benefit work included in the motion filed by Minnesota Co-Lead Counsel and (2) additional work on behalf of its individual clients. The Motion includes all non-Common Benefit work performed by KJC and W&P, including a significant amount of work on Plaintiffs' individual claims and any Common Benefit time that was not approved by Minnesota Co-Lead Counsel. During the process of preparing the supplements for the Motion and KJC's Common Benefit submission to Minnesota Co-Lead Counsel, Minnesota Co-Lead Counsel asked KJC to include its disallowed Common Benefit time, which was included in the Motion, on the supplemental spreadsheet for its Common Benefit time. KJC complied with the request but only seeks reimbursement for that time through the Motion.

As a further point of clarification, the Motion includes time spent by KJC and W&P through June 30, 2018, which is reflected in the first pair of "Other Work" columns on Exhibit A. The second two "Other Work" columns reflect time expended from July 1, 2018, to July 31, 2018.

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Respectfully submitted,

Dated: August 3, 2018

By: /s/ Michael J. Gayan

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Counsel for Certain Individual Plaintiffs

EXHIBIT A

LEGAL FEES TASK PERFORMED	TIMEKEEPER	Other Work*		Other Work**		Notes
		Hours	Fees	Hours	Fees	
Complaint drafting	Attorneys	133.90	\$49,137.50	0.00	\$0.00	Drafting individual complaints
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	64.90	\$11,357.50	0.00	\$0.00	Drafting individual complaints
Dipositive motion briefing/argument	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Class certification motion briefing and argument	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Plaintiff fact sheet preparation/review	Attorneys	558.40	\$156,470.50	0.00	\$0.00	Assisting clients with PFS
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	80.30	\$12,987.50	0.00	\$0.00	Assisting clients with PFS
Paper discovery (Syngenta and third parties)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Paper discovery against plaintiffs	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Discovery motion practice and communications with adverse parties	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Fact depositions (Syngenta and third parties)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Defend fact depositions (of plaintiffs)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Discovery file management	Attorneys	0.30	\$112.50	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	7.70	\$1,347.50	0.00	\$0.00	
EXPERT WORK, DAUBERT MOTIONS						
Plaintiffs' expert witness work (including development of report, defense of depositions)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Defendant expert witness work (depositions)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Daubert motion practice (plaintiff experts)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Daubert motion practice (defense experts)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
PRETRIAL PREP, TRIAL, AND POST TRIAL						
Motions in limine	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	

* These totals include individual time through June 30, 2018, and any Common Benefit work not approved by MN Co-Lead Counsel. They match the totals in this firm's Motion for Fees.

** These totals include individual time from July 1-31, 2018.

LEGAL FEES TASK PERFORMED	TIMEKEEPER	Other Work*		Other Work**		Notes
		Hours	Fees	Hours	Fees	
Trial (presenting witnesses and argument)	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Trial briefing and jury instructions	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Other pretrial motion practice	Attorneys	4.60	\$2,235.00	0.00	\$0.00	Motion practice re: NV action
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Post-trial briefing	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
SETTLEMENT AND SETTLEMENT ADMINISTRATION						
Pre-settlement communication with clients	Attorneys	6.60	\$2,150.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	2.60	\$455.00	0.00	\$0.00	
Settlement negotiations	Attorneys	0.00	\$0.00	0.00	\$0.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	0.00	\$0.00	0.00	\$0.00	
Assisting clients in perfecting claims in settlement	Attorneys	2.10	\$825.00	2.20	\$627.00	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	6.60	\$1,155.00	4.40	\$770.00	
Preparation of fee petition	Attorneys	6.50	\$2,702.50	57.90	\$22,748.50	
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	13.10	\$2,292.50	45.10	\$6,214.00	
ADMINISTRATIVE						
Administrative work as court-appointed leadership	Attorneys	64.80	\$32,125.00	0.50	\$25.00	Admin work for individual clients/cases
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	89.60	\$15,680.00	0.00	\$0.00	Admin work for individual clients/cases
OTHER (describe in Notes)						
	Attorneys	746.80	\$374,032.50	0.60	\$225.00	Client communications, individual case and client maintenance
	Contract Attorneys	n/a	n/a	n/a	n/a	
	Non-attorneys	1261.70	\$220,797.50	0.60	\$105.00	Client communications, individual case and client maintenance
Totals		3050.50	\$885,863.00	111.30	\$30,914.50	

* These totals include individual time through June 30, 2018, and any Common Benefit work not approved by MN Co-Lead Counsel. They match the totals in this firm's Motion for Fees.

** These totals include individual time from July 1-31, 2018.