

**STATE OF MINNESOTA
COUNTY OF HENNEPIN**

**DISTRICT COURT
FOURTH JUDICIAL DISTRICT**

IN RE: SYNGENTA LITIGATION

This Document Relates to:
All Cases

Case Type: Civil Other
Court File No.: 27-CV-15-3785
Honorable Laurie J. Miller

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

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. (WS Plaintiffs

are identified in the following multi-plaintiff Complaints filed with this Court entitled Hennepin County Court File Nos.:

27-cv-15-11222, *Palmer, et al., v. Syngenta, Inc. et al.*
27-cv-15-11240, *Kramer, et al., v. Syngenta, Inc. et al.*
27-cv-15-18490, *Guggisberg, et al., v. Syngenta, Inc. et al.*
27-cv-15-18500, *Anderson, et al., v. Syngenta, Inc. et al.*
27-cv-15-18502, *Hagen, et al., v. Syngenta, Inc. et al.*
27-cv-15-18800, *Lilleberg, et al., v. Syngenta, Inc. et al.*
27-cv-15-18805, *Littrell, et al., v. Syngenta, Inc. et al.*
27-cv-15-18875, *Hicks, et al., v. Syngenta, Inc. et al.*
27-cv-15-19230, *Molitor, et al., v. Syngenta, Inc. et al.*
27-cv-15-19462, *Hoffman, et al., v. Syngenta, Inc. et al.*
27-cv-15-19543, *LeBlanc, et al., v. Syngenta, Inc. et al.*
27-cv-15-19583, *LeBlanc, et al., v. Syngenta, Inc. et al.*
27-cv-15-19610, *Bastian, et al., v. Syngenta, Inc. et al.*
27-cv-15-20018, *Kramer, et al., v. Syngenta, Inc. et al.*
27-cv-15-22096, *Balderston, et al., v. Syngenta, Inc. et al.*
27-cv-16-8991, *Efta, et al., v. Syngenta, Inc. et al.*
27-cv-16-16869, *Hokeness, et al., v. Syngenta, Inc. et al.*

and fully in an attachment to this Motion.

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 9, 2018

Respectfully submitted,

/s/ Stephen J. Randall

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ACKNOWLEDGMENT

Plaintiffs, through their undersigned counsel, hereby acknowledge that sanctions may be imposed under the circumstances set forth in Minn. Stat. § 549.211.

DATED: July 9, 2018

s/ Stephen J. Randall

Stephen J. Randall (MN #221910)