

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

IN RE: SYNGENTA LITIGATION

Case Type: Civil Other
Hon. Laurie J. Miller

This Document Relates to:
All Cases

FILE NO. 27-CV-15-12625
and FILE NO. 27-CV-15-3785

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

**IN RE: SYNGENTA AG MIR162
CORN LITIGATION**

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

This Document Relates to:
All Cases Except:

MDL No. 2591

*Louis Dryfus Company Grains
Merchandising LLC v. Syngenta AG,
Et al., No. 16-2788-JWL-JPO*

*Trans Costal 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*

**NOLAN LAW GROUP'S SUBMISSION OF EXCEL SPREADSHEET IN SUPPORT OF
ITS MOTION FOR AWARD OF ATTORNEYS FEES AND REIMBURSEMENT OF
COSTS**

In accordance with the 7/18/18 MDL Order regarding Attorney Fee Submissions, Nolan Law Group hereby submits the following excel spreadsheet attached hereto as EXHIBIT A that

further supports Nolan Law Group's 7/10/18 Motion for Award of Attorneys Fees and Reimbursement of Costs and Memorandum in Support filed in *In re: Syngenta Litigation* (Case No. 27-cv-15-3785 Hennepin County, MN).

Nolan Law Group's 7/10/18 motion asked the Court to honor its contingency fee contracts with its clients and award payment of the contractually agreed upon fees & expenses on its clients' gross recoveries from any fund created to pay attorneys' fees and expenses arising out of the preliminarily approved class action. The motion further requested that in the alternative, to the extent the Court awarded attorneys representing individual claimants based on a reasonable hourly fee for time and costs incurred in the prosecution of the action, Movant requested leave to supplement its request with detailed time reports of the Firm and associated co-counsel detailing its 1,180.70 hours (reflected on the attached EXHIBIT A), and any other information or documentation the Court may require.¹

It should also be noted that at the time of the filing of its fee petition, Nolan Law Group was unable to confirm whether its time (and associated co-counsel, Winne Law Office, LLC's time) spent collecting, compiling and serving PFSs on Syngenta had been approved and submitted by MN leadership as approved Common Benefit time as part of the 7/10/18 Minnesota Co-Lead Counsel's Joint Motion of Approval of Common Benefit Award. It has since been verified that Nolan Law Group/Winne Law Office's common benefit time for PFS work was in fact approved and submitted by MN Co-lead Counsel as part of said motion (see attached EXHIBIT B) and is reflected as such on EXHIBIT A.²

¹ To the extent the Court also requires detailed time reports providing further description for the 1,180.70 hours on the Excel Spreadsheet, Nolan Law Group requests leave to immediately supplement the same.

² As described in the fee petition, Nolan Law Group is not seeking double recovery. Instead, if Movant's time for Plaintiff Fact Sheet work is ultimately approved and awarded by the Court, Movant would request that the Court deduct any approved common benefit award to Movant from any total requested or awarded pursuant to its application to ratify its contingency fee contracts.

Date: 8/3/18

Respectfully Submitted,

/s/ Thomas P. Routh

Thomas P. Routh

NOLAN LAW GROUP

30th Floor, 20 N. Clark St.

Chicago, IL 60602

PH: (312) 630-4000

Fax: (312) 630-4011

Attorney for Nolan Law Group Clients

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed with the Clerk and an electronic copy served upon all counsel of record the 3rd day of August, 2018.

/s/ Thomas P. Routh

Thomas P. Routh

Nolan Law Group (and including Co-Counsel Winne Law Office, LLC)

LEGAL FEES		Approved Common Benefit Work		Other Work		Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
Complaint drafting	Attorneys			0.60	\$240.00	Preparation of Complaints for Nolan Law Group Clients.
	Contract Attorneys			43.00	\$17,200.00	See above.
	Non-attorneys			11.90	\$3,570.00	See above. (11.9 hours at Litigation Manager rate of \$300)
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						Communications with Nolan Law Group clients re necessary PFS documents; obtained, reviewed, sorted, bate-stamped all required 2011-current documents including FSA Form 578s; all documents (such as seed purchase receipts) showing the type of corn seed each client purchased; documents showing each client's sales or contracts for sale of corn (such as sales contracts, settlement sheets and grain elevator summary reports); all documents for crop insurance related to corn for the various year (including crop insurance policies and schedules of insurance summaries), follow up with clients and 3rd parties on missing information; discussions with clients re produced documents; assistance with filling out information, including charts required in the PFS; discussions with co-counsel re status of PFS production for Nolan Law Group Clients; preparation of PFS package for service on defense; service on defense; and/or supplementation of clients' PFSs, etc.
	Attorneys	110.10	\$44,040.00			
	Contract Attorneys	508.90	\$203,560.00			See above.
	Non-attorneys	18.60	\$3,255.00			See above. (18.6 hours at Paralegal rate of \$175)
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					
	Attorneys					

Discovery file management	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 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						Various calls, discussions, written communications, including update letters with Nolas Law Group Clients over the course of the litigation re status, specific client questions, and anticipated & proposed (but not yet preliminarily approved) settlement. See above
	Attorneys			16.40	\$6,560.00	
	Contract Attorneys			40.00	\$16,000.00	
	Non-attorneys					
Settlement negotiations	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Assisting clients in perfecting claims in settlement	Attorneys					Assisting with claim forms, following up on missing data, etc. for all Nolan Law Group clients. (through June, 2018) See above. (1.5 hours at Litigation Manager rate of \$300)
	Contract Attorneys			58.40	\$23,360.00	
	Non-attorneys			1.50	\$450.00	
Preparation of fee petition	Attorneys					
	Contract Attorneys					
	Non-attorneys					
ADMINISTRATIVE						
Administrative work as court-appointed	Attorneys					

Administrative work as court-appointed leadership	Contract Attorneys					
	Non-attorneys					
OTHER (describe in Notes)						
All other time spent on individual Nolan Law Group client files not specified above. (See Notes section for description.)						Opening electronic and hard files for all Nolan Law Group clients. Creating, maintaining, updating, and organizing all Nolan Law Group client data in various spreadsheets. including entering all clients' data into an excel spreadsheet. Scanning and uploading various client documents into legal database. Conferences with local counsel & co-counsel regarding decisions affecting Nolan Law Group clients, litigation issues and status, etc. Regular review, uploading of MDL and MN filings and status of all litigations, ECF notifications, class and participation discussions. Calendared events/deadlines pursuant to Court Orders and update of various client spreadsheets and files to ensure compliance with any and all deadlines. Client specific issues and questions, including multiple deaths of clients, preparation of motions to substitute, questions re various farming entities, proper parties to assert claims, etc.
	Attorneys			53.10	\$21,240.00	
	Contract Attorneys			296.10	\$118,440.00	See above.
	Non-attorneys			22.10	\$6,492.50	See above. (21.0 hours at Litigation Manager rate of \$300. 1.1 hours at Paralegal rate of \$175).

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage	\$330.32	Client letters and requests for PFS documents
Photocopying	\$687.60	Client documents
Hotels		
Meals		
Mileage		
Air Travel		
Court Fees	\$2,486.00	Filing Fees
Transcript Fees		
Groud Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL	\$3,503.92	

Total		
FIRM	Total Hours Submitted	Total Lodestar Submitted
Keaton	30.20	\$5,737.50
Kelly	251.95	\$180,367.50
Kirk	219.85	\$100,390.00
Kittelsen Barry	134.00	\$24,200.00
KKHB	142.75	\$21,748.75
Kraft Walser	96.00	\$15,489.00
Kruse & Dakin	3.00	\$600.00
Kuhlman Lucas	105.60	\$46,020.00
Lee Lewis	123.00	\$37,875.00
Liles	112.50	\$33,750.00
Loftis Barnard	28.00	\$10,600.00
Lowe Eklund Wakefield	958.00	\$332,375.00
Maggio Thompson	168.30	\$46,282.50
Mailander	12.80	\$2,550.00
Maloney	0.00	\$0.00
Manske	39.10	\$7,820.00
March McMillan	90.70	\$19,954.00
Martz Lucas	190.20	\$32,464.00
Masching	376.70	\$84,757.50
Mauro Archer	20,895.00	\$3,759,075.00
Meier Bradicich	45.25	\$13,575.00
Menzer	30.30	\$15,150.00
Mercho Caughey	202.50	\$56,248.50
Meshbesher	792.50	\$396,250.00
Mid-West Ag. Solutions	9.05	\$776.50
Miller, Michael	989.40	\$791,520.00
Miltner Reed	376.60	\$75,944.00
Moore Sussler	35.20	\$7,920.00
Morgan Meyers	37.20	\$5,610.00
Morrissey	244.83	\$13,320.20
Muske Law	136.40	\$22,320.00
Myers Hockemeyer	21.70	\$4,340.00
Nelson Kelley	98.99	\$29,697.00
Nolan	508.90	\$203,560.00
O'Bear	294.25	\$51,411.50
O'Brien David	14.05	\$12,645.00
Odom	63.90	\$20,245.00
O'Hanlon	4.50	\$1,125.00
O'Koon	10.80	\$2,430.00
Ouderkirk	105.71	\$30,434.00
Overboe	552.30	\$249,597.50
Pagel Weikum	33.00	\$6,930.00
Patton Brown	58.50	\$14,625.00
Patton Hoversten	1,461.70	\$206,399.20

Total		
FIRM	Total Hours Submitted	Total Lodestar Submitted
Weinstine	185.00	\$16,023.75
Wilcox Williams	74.60	\$9,325.00
Winne	128.70	\$47,295.00
Wojtalewicz	164.10	\$100,914.00
Wolff Ardis	124.70	\$39,537.50
Wood Rue	200.90	\$32,502.50
Woodard	703.70	\$211,110.00
Woods Rogers	299.90	\$76,754.50
Wright Schulte	2,854.28	\$636,065.00
Wyland Humphry	180.30	\$36,060.00
Yira	2,055.25	\$719,337.50
Zeilinger	182.00	\$17,300.00
TOTAL	129,631.68	\$33,848,167.98