

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 PAMELA D. STEINLE IN SUPPORT OF MINNESOTA CO-
LEAD COUNSEL'S SUPPLEMENT TO THE JOINT MOTION FOR APPROVAL
OF COMMON BENEFIT AWARDS**

I, Pamela D. Steinle, declare and state as follows:

1. I am a member at the law firm of Sunde Olson Kircher and Zender, PLC, 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 completed the work described. I believe that the time information submitted 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 30th day of July, 2018 at St. James, Minnesota.



Pamela D. Steinle

LEGAL FEES TASK PERFORMED	TIMEKEEPER	Approved Common		Other Work		Notes
		Hours	Benefit Work Fees	Hours	Fees	
Complaint drafting	Attorneys					
	Contract Attorneys					
	Non-attorneys					
Dispositive 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	25.70	\$6,425.00			
	Contract Attorneys					
	Non-attorneys					
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	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	Attorneys					2.30	\$575.00	
	Contract Attorneys							
	Non-attorneys							
Settlement negotiations	Attorneys							
	Contract Attorneys							
	Non-attorneys							
Assisting clients in perfecting claims in settlement	Attorneys					7.40	\$1,850.00	
	Contract Attorneys							
	Non-attorneys							
Preparation of fee petition	Attorneys					2.10	\$525.00	
	Contract Attorneys							
	Non-attorneys							

ADMINISTRATIVE

Administrative work as court-appointed leadership	Attorneys					
Contract Attorneys						
Non-attorneys						

OTHER (describe in Notes)

[illegible]