STATE OF MINNESOTA

COUNTY OF HENNEPIN

DISTRICT COURT FOURTH JUDICIAL DISTRICT

In re: Syngenta Litigation and Syngenta Class Action Litigation

This Document Relates to:
INDIVIDUAL CLAIMS
CLASS ACTION

Case Type: Civil Other Honorable Laurie J. Miller

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.

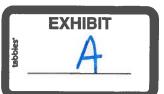
I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing

is true and correct.

Executed on this 30th day of July, 2018 at St. James, Minnesota.

Pamela D. Steinle

THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN CO		Approved Common	ommon			
LEGAL FEES		Benefit Work	Work	Other	Other Work	Notes
TASK PERFORMED	TIMEKEEPER	Hours	Fees	Hours	Fees	
	Attorneys					
Complaint drafting	Contract Attorneys					
	Non-attorneys					
	Attorneys					
Dipositive motion briefing/argument	Contract Attorneys					
	Non-attorneys					
Class cortification motion bringing	Attorneys					
and argument	Contract Attorneys					
9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9 9	Non-attorneys				ļ	
DISCOVERY, DEPOSITIONS, DOC REVIEW						
Disintiff fact shoot	Attorneys	25.70	\$6,425.00			
preparation/review	Contract Attorneys					
בי רבמי מניסיו <i>ו</i> יכאיכאא	Non-attorneys					
Daner discovery (Synganta and third	Attorneys					
narties)	Contract Attorneys					
	Non-attorneys					
	Attorneys					
Paper discovery against plaintiffs	Contract Attorneys					
	Non-attorneys					
Discovery motion practice and	Attorneys					
communications with adverse	Contract Attorneys					
parties	Non-attorneys					
Fact denocitions (Syngents and third	Attorneys					
narties)	Contract Attorneys					
	Non-attorneys					
Defend fact denositions (of	Attorneys					
plaintiffs)	Contract Attorneys					
	Non-attorneys					



	Attorneys
Discovery file management	Attorneys
	Non-attorneys Non-attorneys
EXPERT WORK, DAUBERT MOTIONS	
Plaintiffs' expert witness work	Attorneys
(including	Contract Attorneys
development of report, defense of	Non-attorneys
Defendant expert witness work	Attorneys
(denocitions)	Contract Attorneys
(depositions)	Non-attorneys
Daubort motion practice (plaintiff	Attorneys
pyparts)	Contract Attorneys
Capter Co)	Non-attorneys Non-attorneys
Daubert motion practice (defense	Attorneys
pyperts)	Contract Attorneys
	Non-attorneys
PRETRIAL PREP, TRIAL, AND POST	
Motions in limino	
	Non-attorneys
Trial (proporting without on the	
argument)	Contract Attorneys
	Non-attorneys
	Attorneys
Trial briefing and jury intructions	Contract Attorneys
	Non-attorneys Non-attorneys
	Attorneys
Other pretrial motion practice	Contract Attorneys
	Non-attorneys
	Attorneys
Post-trial briefing	Contract Attorneys
	Non-attorneys .

SETTLEMENT AND SETTLEMENT ADMINISTRATION

ADMINISTRATION			
Pre-settlement communication with	Attorneys	2.30	\$575.00
	Contract Attorneys		
	Non-attorneys		
	Attorneys		
Settlement negotiations	Contract Attorneys		
	Non-attorneys		
Assisting clients in perfecting claims	Attorneys	7.40	\$1,850.00
in	Contract Attorneys		
settlement	Non-attorneys		
	Attorneys	2.10	\$525.00
Preparation of fee petition	Contract Attorneys		
	Non-attorneys		
ADMINISTRATIVE			
Administrative work as	Attorneys		
court-appointed	Contract Attorneys		
leadership	Non-attorneys		
OTHER (describe in Notes)			
			Time incurred on individual client
	Attorneys	35.30	matters, including initial client \$8,825.00 informational meetings and updates.
	Contract Attorneys		
	Non-attorneys		
	Non-attorneys		I 1