

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

**IN RE SYNGENTA AG MIR162
CORN LITIGATION**

**THIS DOCUMENT RELATES TO
ALL CASES EXCEPT:**

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

*Trans Coastal 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*

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

MDL No. 2591

ORDER REGARDING ATTORNEY FEE SUBMISSIONS

Pursuant to the Court's order by which it preliminarily approved the class settlement in this action (Doc. # 3532), motions and petitions for awards of attorney fees and expenses and for service/case contribution/incentive awards were due by July 10, 2018, with any responses to those motions and petitions due by October 17, 2018. The Court has received many such motions. With respect to those motions, the Court orders as follows:

1. The October 17 deadline for responses to such motions and petitions is hereby vacated. Any responses to the filed fee motions and petitions shall be filed by

August 17, 2018, with any reply briefs filed by **September 17, 2018**. These deadlines will allow sufficient time for those issues to be fully briefed and considered before the final approval hearing.

2. The Court appreciates the thorough submissions by counsel with respect to their fee requests. The Court is requiring completion and submission of Excel spreadsheets so that certain basic fee and expense information can be presented to the Court and Special Masters in standardized summary format that will facilitate review and evaluation of hours and expense data. Review will not be limited to the information submitted on these forms; information previously submitted in support of fee and expense petitions will be considered, and counsel are also free to submit with their reply briefs any additional information they believe is relevant to determining (a) what portion of the Settlement Amount should be allocated to attorney fees and expenses and (b) the appropriate allocation of that amount among plaintiffs' counsel.

Accordingly, any motion or petition for attorney fees or expenses that has been filed with the Court shall be supplemented by **August 3, 2018**, as follows. Petitioners shall complete and submit an Excel spreadsheet in the form attached hereto as Appendix A (an electronic copy of which will be posted in Excel form on the page for this MDL on the Court's website). Petitioners should provide information on a firmwide basis for each category of timekeeper (attorneys, contract attorneys, non-attorneys), without breaking down that information by individual timekeeper. Petitioners should also be sure to complete both of the spreadsheet's "sheets" (one for fees, the other for expenses). Each

petitioner should (a) file (through ECF) a printout of its spreadsheet in PDF form and (b) submit an electronic copy of its spreadsheet in Excel form by email to the Special Masters.

IT IS SO ORDERED.

Dated this 18th day of July, 2018, in Kansas City, Kansas.

s/ John W. Lungstrum
John W. Lungstrum
United States District Judge

LEGAL FEES	TIMEKEEPER	Approved Common Benefit Work		Other Work		Notes
		Hours	Fees	Hours	Fees	
PLEADINGS, BRIEFS, DISPOSITIVE MOTIONS						
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 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 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					

Other pretrial motion practice Post-trial briefing	Non-attorneys Attorneys Contract Attorneys Non-attorneys Attorneys Contract Attorneys Non-attorneys			
SETTLEMENT AND SETTLEMENT ADMINISTRATION				
Pre-settlement communication with clients Settlement negotiations Assisting clients in perfecting claims in settlement Preparation of fee petition	Attorneys Contract Attorneys Non-attorneys Attorneys Contract Attorneys Non-attorneys Attorneys Contract Attorneys Non-attorneys Attorneys Contract Attorneys Non-attorneys			
ADMINISTRATIVE				
Administrative work as court-appointed leadership	Attorneys Contract Attorneys Non-attorneys			
OTHER (describe in Notes)				
	Attorneys Contract Attorneys Non-attorneys			

EXPENSES PAID	Amount	Notes
Common Benefit Assessment Fees		
Postage		
Photocopying		
Hotels		
Meals		
Mileage		
Air Travel		
Common Benefit Assessment Fees		
Court Fees		
Transcript Fees		
Ground Transportation		
Expert/Consulting Fees Not Included in Common Benefit		
Special Master Fees		
Miscellaneous (Describe)		
TOTAL		