

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

In re: Syngenta Litigation

This Document Relates to: ALL ACTIONS[†]

Case Type: Civil Other
Honorable Thomas M. Sipkins

File No.: 27-CV-15-3785

**SYNGENTA'S NOTICE OF MOTION
AND MOTION TO DISMISS FIRST
AMENDED NON-CLASS AND FIRST
AMENDED MINNESOTA CLASS
ACTION MASTER COMPLAINTS FOR
PRODUCERS AND NON-PRODUCERS**

TO: Plaintiffs and their counsel:

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PLEASE TAKE NOTICE that on **Friday, January 8, 2016 at 9:00 a.m.** at the Hennepin County Government Center in Minneapolis, Minnesota, before the Honorable Thomas M. Sipkins, Judge of the Hennepin County District Court, Defendants Syngenta Crop Protection, LLC, Syngenta Corporation, Syngenta Seeds, Inc., and Syngenta Biotechnology, Inc. will move the Court for an Order dismissing the First Amended Non-Class and First Amended Minnesota

[†] Pursuant to this Court's Scheduling Order No. 1, this Motion to Dismiss applies to all claims brought by Plaintiffs who reside in one of the 22 States currently at issue in the federal MDL, with proceedings in all other cases deferred.

Class Action Master Complaints for Producers and Non-Producers pursuant to Minn. R. Civ. P. 12.02(e).

The motion will be based on all the files, records, and proceedings herein, as well as memoranda, supporting affidavits, and exhibits to be served and filed in accordance with Rule 115.03 of the Minnesota General Rules of Practice, and arguments of counsel.

Dated: November 9, 2015

Respectfully submitted,

/s/ David T. Schultz

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