

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 FOR ROLLING
PRODUCTION OF PLAINTIFF FACT
SHEETS FROM REMAINING
PRODUCER PLAINTIFFS WITHOUT
DELAYING BELLWETHER
DISCOVERY SCHEDULE**

TO: PLAINTIFFS AND THEIR COUNSEL:

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**Francisco Guerra IV, Watts Guerra LLP, Building 3 - Suite 100, Four Dominion
Drive, San Antonio, TX 78257**

PLEASE TAKE NOTICE that on **Friday, December 18, 2015 at 8:30 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 requiring all remaining producer plaintiffs to submit a Plaintiff Fact Sheet within six months for those plaintiffs who already have lawsuits on file, with rolling deadlines of forty-five days after the initiation of a lawsuit for plaintiffs who file suit thereafter.

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 115.04 of the Minnesota General Rules of Practice, and arguments of counsel.

Dated: December 1, 2015

Respectfully submitted,

MASLON LLP

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**ATTORNEYS FOR SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION LLC,
SYNGENTA SEEDS, INC., AND
SYNGENTA BIOTECHNOLOGY, INC.**

4839-8915-5627