

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

JOSHUA RAWA, ELISABETH MARTIN, ROBERT  
RAVENCAMP, AMY WARD, CYNTHIA DAVIES,  
CHRISTOPHER ABBOTT, OWEN OLSON,  
JEANNIE A. GILCHRIST, ZACHARY SHOLAR,  
MATTHEW MYERS, JOHN W. BEARD, JR., and  
MICHAEL OVERSTREET on behalf of themselves,  
all others similarly situated, and the general public,

Plaintiffs,

v.

MONSANTO COMPANY,

Defendant.

Case No. 4:17-cv-01252-AGF

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF  
NATIONWIDE CLASS ACTION SETTLEMENT BY CONSENT**

COME NOW plaintiffs Joshua Rawa, Elisabeth Martin, Robert Ravencamp, Amy Ward, Cynthia Davies, Christopher Abbott, Owen Olson, Jeannie A. Gilchrist, Zachary Sholar, Matthew Myers, John W. Bear, Jr., and Michael Overstreet, on behalf of themselves, all others similarly situated, and the general public ("Plaintiffs"), by and through their undersigned counsel, with defendant Monsanto's consent, and for their Motion for Preliminary Approval of Nationwide Class Action Settlement *By Consent* ("Motion"), state as follows:

1. Plaintiffs and defendant Monsanto Company ("Monsanto") have reached a nationwide class action settlement of the claims raised in this litigation.
2. The Settlement Agreement memorializes the terms of the settlement.
3. Plaintiffs incorporate by reference, as if fully stated herein, their contemporaneously filed Memorandum in Support of the Motion ("Memorandum").
4. Plaintiffs further incorporate by reference the contemporaneously filed Declarations of Jack Fitzgerald, Hon. James F. Holderman (Ret.), and Mark A. Fellows.

WHEREFORE, for the reasons fully set forth in Plaintiff's Memorandum, pursuant to Fed. R. Civ. P. 23(e), Plaintiffs respectfully request this Court enter an Order: (1) certifying the class action for settlement purposes, and appointing Plaintiffs and their counsel as Class Representatives and Class Counsel; (2) preliminarily approving the Settlement Agreement as fair, appropriate and reasonable; (3) approving the Notice, Notice Plan, and directing distribution of Notice to the Class; and (4) setting a briefing schedule leading up to, and date for a Final Approval hearing.

Dated: October 4, 2017

Respectfully Submitted,

By: /s/ Kevin J. Dolley

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