

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 FINAL APPROVAL OF
NATIONWIDE CLASS ACTION SETTLEMENT BY CONSENT**

COME NOW plaintiffs and Class Representatives 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” or “Class Representatives”), by and through their undersigned counsel (“Class Counsel”), with defendant Monsanto Company’s consent, and for their Motion for Final Approval of Nationwide Class Action Settlement *By Consent* (“Motion”), state as follows:

1. The Class Representatives and Monsanto reached a nationwide class settlement,¹ which, on December 6, 2017, this Court preliminarily approved (Dkt. No. 41).
2. The Settlement Agreement memorializes the terms of the settlement.
3. The Class Representatives incorporate by reference, as if fully stated herein, their contemporaneously-filed Memorandum in Support of the Motion (“Memorandum”).

¹The Settlement Agreement is attached as Exhibit 1 to the Declaration of Jack Fitzgerald in Support of Motion for Preliminary Approval of Class Action Settlement (Dkt. No. 32-1 at 6-23 [hereinafter “Settlement Agreement”]). All capitalized terms herein have the meaning specified in the Settlement Agreement.

4. The Class Representatives also incorporate by reference, as if fully stated herein, their previously-filed Memorandum in Support of their Motion for Preliminary Approval (Dkt. No. 32), and all other papers and evidence submitted in support of that motion.

5. The Class Representatives further incorporate by reference the contemporaneously-filed Declarations of Mark A. Fellows (“Fellows Decl.”), Kim Ness (“Ness Decl.”), and Jack Fitzgerald (“Fitzgerald Decl.”).

WHEREFORE, for the reasons fully set forth in the Class Representatives’ Memorandum, pursuant to Fed. R. Civ. P. 23(e), the Class Representatives respectfully request this Court enter an Order granting Final Approval.

Dated: March 13, 2018

Respectfully Submitted,

By: /s/ Jack Fitzgerald

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