

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 ATTORNEYS' FEES, COSTS, AND SERVICE AWARDS

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"), and their undersigned counsel ("Class Counsel"), and for their Motion for Attorneys' Fees, Costs, and Service Awards ("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 have concurrently filed a Motion for Final Approval of Proposed Nationwide Class Settlement ("Final Approval Motion"), including a supporting Memorandum ("Final Approval Mem."), which the Class Representatives and Class Counsel ("Movants") incorporate by reference as if fully stated herein.

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. Movants also incorporate by reference, as if fully stated herein, their contemporaneously-filed Memorandum in Support of the Motion (“Memorandum”).

4. Movants 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. Movants also incorporate by reference the contemporaneously-filed Declaration of Jack Fitzgerald (“Fitzgerald Decl.”).

WHEREFORE, for the reasons fully set forth in the Movants’ Memorandum, the Movants respectfully request this Court enter an Order granting the Motion and awarding attorneys’ fees in the amount of one-third of the Common Fund (\$7,166,666), costs of \$97,613.92, and service awards of \$10,000 to plaintiff Martin, \$5,000 each to plaintiffs Rawa and Ravencamp, and \$2,500 each to plaintiffs Ward, Davies, Abbott, Olson, Gilchrist, Sholar, Myers, Bear, and Overstreet.²

Dated: March 13, 2018

Respectfully Submitted,

By: /s/ Jack Fitzgerald
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² Per the Settlement Agreement, Monsanto reserves the right to file a response to the motion.

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Class Counsel