

John B. Van de North, Jr.

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November 11, 2015

To All Counsel

Via E-File Only

RE: In re: Syngenta Litigation
File No. 27-cv-15-3785
Interim Status Conferences
Our File No. 2-657-0001

Dear Counsel:

At the October 30, 2015 status conference, Judge Sipkins and the parties briefly discussed the need for more frequent status conferences. As we finalize bellwether selection and embark on discovery and motions, regular informal meetings to discuss issues as they arise will be beneficial to the parties and the Court. Therefore, I submit the following proposal.

Beginning November 19, 2015, I will convene bi-monthly status conferences on the first and third Thursday of each month beginning at 1:30 p.m. These meetings will be held (at least initially) at the Larson • King offices in St. Paul. Non-local leadership counsel can participate by teleconference if they choose:

Call-in Number: (866) 755-7677

Participant Code: 696628

We are exploring the possibility of using ITV facilities in the future. I expect that attorneys from the leadership groups representing Plaintiffs and Defendants will participate in the conferences.

I will generate an agenda for each session. If a party would like to place an item on the agenda, counsel shall submit the request via e-mail four days prior to the conference, with copies to all counsel. Unless specifically requested and approved by me, no written submissions will be made prior to the conferences. These meetings will be informal and the purpose is to avoid surprises by airing problems as they arise. If disputes cannot be addressed informally, the parties or Special Magistrate will refer the matter to Judge Sipkins for more formal consideration.

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A preliminary agenda for the first status conference is:

- I. Progress report and discussion of bellwether case selection.
- II. Discussion of inclusion of time-keeping, costs, and fee submissions in the CBO (*compare* 1/22/09 *Levaquin* CBO, pp. 7-15 and 8/5/15 *Syngenta* Order, ¶ 5.)
- III. Replacement for Clayton Clark.

Please e-mail any objections or suggestions regarding this proposal to me by Monday, November 16. We can make adjustments to the schedule and format as we go.

Best regards,

LARSON • KING, LLP

s/John B. Van de North

John B. Van de North, Jr.

JBV/kal
LK 1495441

cc: The Hon. Thomas M. Sipkins (Via E-Mail Only)
Ms. Melannie Markham (Via E-Mail Only)