

**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 AMENDED 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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**PLEASE TAKE NOTICE** that on **Friday, December 18, 2015 at 11:00 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 7, 2015

Respectfully submitted,

**MASLON LLP**

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SYNGENTA CROP PROTECTION LLC,  
SYNGENTA SEEDS, INC., AND  
SYNGENTA BIOTECHNOLOGY, INC.**

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