

In Re Syngenta AG MIR 162 Corn Litigation
Confidential Plaintiff Fact Sheet

Please answer each question on this form according to the instructions. If additional space is needed, please attach additional pages. If a particular question is not applicable, please put N.A. in the answer space.

CASE NO.: [WE WILL COMPLETE UPON FILING YOUR COMPLAINT].

PLAINTIFF NAME: _____

If the Plaintiff is a partnership, please state the name of the partnership and list the names of all of the partners.

PLAINTIFF'S ADDRESS: _____

Please provide Plaintiff's Social Security number or Federal tax identification number. If the Plaintiff is a partnership, please provide the Social Security number or Federal tax identification number of each partner listed above.

ENTITY/INDIVIDUAL NAME	SOC. SEC. # OR FEDERAL TAX ID #

If Plaintiff is a corporation, limited liability company (LLC), general partnership (GP), limited liability partnership (LLP), or limited partnership (LP), please identify the state

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under whose laws Plaintiff is organized (Plaintiff would have filed organizational documents with the Secretary or Division of Corporations in this state): _____.

PART A

PLEASE COMPLETE PART A IF PLAINTIFF PRODUCED AND SOLD CORN AT ANY TIME SINCE JANUARY 2011.

A1. Please list all farms on which Plaintiff produced corn for the 2011-2015 growing seasons, including the farm FSA number, and county and state in which each farm is located (regardless of whether Plaintiff owned the land). Please also provide the number of acres of corn grown on each farm for each growing season.

FSA#	County/State	ACRES OF CORN				
		2011	2012	2013	2014	2015

A2. For each farm identified in your response to Question A1, please state the variety of corn grown (including the name of the genetically modified seed), acres grown, and whether you owned or leased the land.

FSA #	2011			2012		
	Corn Variety	Acres	Owned/leased	Corn Variety	Acres	Owned/leased

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FSA #	2013			2014		
	Corn Variety	Acres	Owned/leased	Corn Variety	Acres	Owned/leased

FSA #	2015		
	Corn Variety	Acres	Owned/Leased

A3. For each contract for the sale of corn, from 2011 to the present, please provide the contract date, number of bushels, how the bushels were priced (seasonal pool, pricing pool, booking contract, basis contract, hedged to arrive contract, cash sale, or other contract), date the corn was priced, price per bushel, the name and location of the buyer, and the FSA # of the farm(s) on which the corn was grown.

Date	No. of Bushels	How Priced	Date Priced	Price	Name & Location of Buyer	FSA #

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A4. From the 2011 crop year to the present, have you grown corn that you have not sold? (Yes or No) _____

If so, approximately what percentage of the corn have you not sold? _____

A5. Identify the name, company, and address of any crop/marketing consultant(s) who assisted with the marketing of your corn, from 2011 to the present.

A6. From the 2011 crop year to the present, have you raised livestock? (Yes or No) _____. If so, what is the approximate number of bushels of corn used to feed your livestock each year?

A7. For each crop year from 2011 to the present, have you been part of an ethanol cooperative? (Yes or No) _____. If so, please state for each year whether you are required to supply a certain amount of corn to the cooperative?

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A8. From 2011 to the present, have you grown or sold any other crop that was genetically modified? (Yes or No) _____.

A9. From 2011 to the present, have you taken any steps to test for the presence of Viptera or Duracade in corn grown or sold by you? (Yes or No) _____.

A10. Do you use email to discuss any of the above-described information (and/or do others use email regarding such information above regarding any of your farms)? (Yes or No) _____. If so, please list all email addresses that are or were used:

A11. Do you maintain any of the above-described information in the form of electronic records? (Yes or No) _____.

A12. Name of person completing this form: _____

PART B

TO THE EXTENT YOU HAVE DOCUMENTS FALLING WITHIN THE FOLLOWING CATEGORIES, OR CAN SECURE SUCH DOCUMENTS FROM YOUR LOCAL FSA OFFICE, PLEASE PRODUCE COPIES OF THEM.

1. Documents showing the corn seed you purchased, from 2011 to the present.

2. Documents reflecting the terms and conditions of all of your corn sales or contracts for the sale of corn, from 2011 to the present.

3. Documents showing any additional expenses you have incurred and/or financial losses you have suffered as a result of Syngenta marketing and selling Viptera and/or Duracade corn seed.

4. Documents reflecting crop insurance pertaining to corn for the 2013 and 2014 crop years.

5. FSA Form 578 for all crop years, from 2011 to the present.