

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SCOTT GILMORE, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. No. 20-1085-MN
	)	
MONSANTO COMPANY,	)	
	)	
Defendant.	)	

**PLAINTIFFS’ MOTION FOR PRELIMINARY APPROVAL OF  
CLASS ACTION SETTLEMENT AND FOR CERTIFICATION OF  
THE CLASS FOR THE PURPOSES OF SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 23, Plaintiffs Scott Gilmore, Julio Ezcurra, James Weeks, Amanda Boyette, Anthony Jewell, Paul Taylor, Sherry Hanna, and Kristy Williams (“Plaintiffs”), on behalf of themselves and the Settlement Class, and with Defendant Monsanto Company’s consent, hereby move for (1) preliminary approval of the proposed Class Action Settlement Agreement attached as Exhibit 1 to the declaration of Gillian Wade filed concurrently herewith; (2) preliminary certification of the proposed Settlement Class for purposes of settlement and appointment of the Plaintiffs and their counsel as Class Representatives and Class Counsel, respectively; (3) approval of the Class Notice and Notice Plan; and (4) setting of a fairness hearing and other necessary dates in connection with Final Approval of the Class Action Settlement Agreement.

The grounds and support for this motion are set forth in more detail in Plaintiffs’ supporting memorandum and the accompanying declarations and exhibits filed concurrently herewith.

Dated: June 14, 2021

/s/ Chandra J. Williams

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William J. Rhodunda, Jr. (#2774)  
Chandra J. Williams (#4907)  
Rhodunda Williams & Kondraschow  
Brandywine Plaza West  
1521 Concord Pike, Suite 205  
Wilmington, DE 19803  
Bill@rawlaw.com  
Chandra@rawlaw.com

Gillian L. Wade (admitted pro hac vice)  
Marc A. Castaneda (admitted pro hac vice)  
Sara D. Avila (admitted pro hac vice)  
MILSTEIN, JACKSON,  
FAIRCHILD & WADE, LLP  
10250 Constellation Blvd., Suite 1400  
Los Angeles, CA 90067  
Telephone: (310) 396-9600  
Fax: (310) 396-9635  
gwade@mjfwlaw.com  
mcastaneda@mjfwlaw.com  
savila@mjfwlaw.com

*Counsel for Plaintiffs*