

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

CITY OF GREENVILLE, ILLINOIS, *et al.*)
)
 Individually and on behalf of all)
 others similarly situated,)
)
 Plaintiffs,)
)
 v.) Case No. 10-188-JPG-PMF
)
 SYNGENTA CORP PROTECTION,)
 LLC, and SYNGENTA AG,)
)
 Defendants.)

**JOINT MOTION FOR A 28-DAY STAY OF
ALL PROCEEDINGS AND DEADLINES**

The parties are in the midst of attempting to resolve a number of their disputes without the Court’s intervention. A resolution of these disputes would conserve the Court’s time and client resources, as well as potentially obviating certain pending motions. To facilitate a beneficial resolution, the parties request that the Court grant a 28-day stay of all proceedings and deadlines, including the deadlines in the current scheduling order. Below is a list of all current deadlines, alongside the requested new deadlines:

- Plaintiff City of Greenville’s and City of Marion’s Responses to Syngenta’s Motions for Summary Judgment (Docs. 260, 263)

Current: 3/1/2012 **New:** 3/29/2012

- Plaintiffs' depositions for discovery prior to class certification, defendants' depositions prior to class certification, and plaintiff's expert witnesses for class certification shall be taken/disclosed

Current: 4/2/2012 **New:** 4/30/2012

- Plaintiffs' expert witnesses for class certification shall be deposed and defendants' expert witnesses for class certification shall be disclosed

Current: 5/2/2012 **New:** 5/30/2012

- Plaintiffs' rebuttal experts for class certification shall be disclosed and defendant's expert witnesses for class certification shall be deposed

Current: 6/1/2012 **New:** 6/29/2012

- Plaintiffs' rebuttal experts for class certification shall be deposed

Current: 6/15/2012 **New:** 7/13/2012

- Plaintiffs' motion for class certification shall be filed

Current: 6/15/2012 **New:** 7/13/2012

- Defendants' memorandum in opposition to class certification shall be filed

Current: 7/13/2012 **New:** 8/10/2012

- Plaintiff's reply memorandum must be filed

Current: 7/27/2012 **New:** 8/24/2012

- Any *Daubert* challenges to class certification experts shall be filed

Current: 6/29/2012 **New:** 7/27/2012

- Expert witnesses for trial, if any, shall be disclosed as follows:

Plaintiffs' experts

Current: 7/16/2012 **New:** 8/13/2012

Defendants' experts

Current: 8/15/2012 **New:** 9/12/2012

Plaintiffs' rebuttal experts

Current: 9/14/2012 **New:** 10/12/2012

- Expert witnesses for trial, if any, shall be deposed as follows:

Plaintiffs' experts

Current: 8/15/2012 **New:** 9/12/2012

Defendants' experts

Current: 9/14/2012 **New:** 10/12/2012

Plaintiffs' rebuttal experts

Current: 10/8/2012 **New:** 11/5/2012

- All discovery shall be completed

Current: 10/8/2012 **New:** 11/5/2012

- All dispositive motions shall be filed

Current: 10/22/2012 **New:** 11/19/2012

Defendants' counsel have agreed to let Plaintiffs' counsel sign on their behalf for purposes of this Joint Motion.

Respectfully submitted by all parties,

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CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2012, I electronically filed the above document with the Clerk of Court using the CM/ECF system, which will electronically deliver notice of the filing to all counsel of record.

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