

**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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