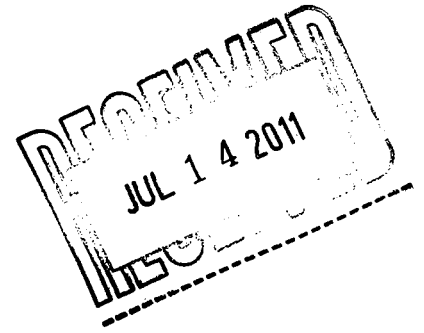


IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS



HOLIDAY SHORES SANITARY DISTRICT; CITY OF)
CARLINVILLE, ILLINOIS; CITY OF FLORA, ILLINOIS;)
CITY OF FAIRFIELD, ILLINOIS; CITY OF HILLSBORO,)
ILLINOIS; AND CITY OF MATTOON, ILLINOIS;)
individually and on behalf of all others similarly)
situated,)

Plaintiffs,)

v.)

Cause No. 04-L-710)

SYNGENTA CROP PROTECTION, INC., AND)
GROWMARK, INC.,)

Defendants.)

PLAINTIFF'S MOTION TO FILE EXHIBIT UNDER SEAL

Come now Plaintiffs, HOLIDAY SHORES SANITARY DISTRICT, *et al.*, by and through their undersigned attorneys, and for their motion for to file exhibit to their motion for a protective order under seal, state:

1. On August 31, 2009, the Court entered a protective order, which governs the use and dissemination of all information, documents, or materials that are produced in this action and designated as "confidential." *See Protective Order filed August 31, 2009.* Under the protective order, "confidential information" may only be disclosed specifically delineated individuals. ¶6. When including "confidential information" as part of a court filing, the parties must file such information under seal in accordance with the applicable Local Rules. ¶9

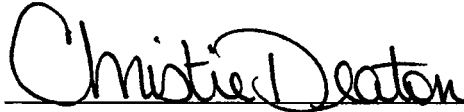
2. Plaintiffs referenced the June 9, 2011, deposition of Sherry Ford as Exhibit 1 to their Motion for a Protective Order, portions of which have been designated as "Confidential" under the protective order.

3. Plaintiffs file this motion to this deposition under seal to comply with their obligations under the protective order entered on August 31, 2009.

Wherefore, Plaintiffs ask this Court allow it to file their Exhibit 1 under seal.

Respectfully submitted,

KOREIN TILLERY



STEPHEN M. TILLERY # 2834995
CHRISTINE J. MOODY # 6211904
STEPHEN SWEDLOW # 6234550
CHRISTIE R. DEATON # 6276456
505 North 7th Street, Suite 3600
St. Louis, MO 63101
Phone: 314.241.4844
Fax: 314.241.3525

BARON & BUDD, PC

SCOTT SUMMY, *pro hac vice*
CARLA BURKE, *pro hac vice*
CELESTE EVANGELISTI, *pro hac vice*
CARY MCDUGAL, *pro hac vice*
3102 Oak Lawn Avenue, Suite 1100
Dallas, TX 75129-3605
Phone: 214.521.3605
Fax: 214.520.1181

Attorneys for the Plaintiffs

IN THE CIRCUIT COURT
THIRD JUDICIAL CIRCUIT
MADISON COUNTY, ILLINOIS

HOLIDAY SHORES SANITARY DISTRICT; CITY OF)
CARLINVILLE, ILLINOIS; CITY OF FLORA, ILLINOIS;)
CITY OF FAIRFIELD, ILLINOIS; CITY OF HILLSBORO,)
ILLINOIS; AND CITY OF MATTOON, ILLINOIS;)
individually and on behalf of all others similarly)
situated,)

Plaintiff,)

v.)

Cause No. 04-L-710

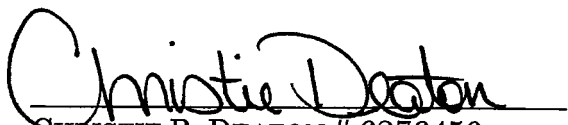
SYNGENTA CROP PROTECTION, INC., AND)
GROWMARK, INC.,)

Defendants.)

CERTIFICATE OF SERVICE

The undersigned certifies that true copies of the Plaintiff's Motion to File Exhibit under Seal were served upon the attorneys of record for the defendants in this cause via United States mail, by enclosing said copy in an envelope addressed to said attorneys at his/her address as disclosed by the pleadings on file in this cause and by depositing said envelope in a U.S. Post Office mailbox on this 12th day of July, 2011.

KOREIN TILLERY



CHRISTIE R. DEATON # 6276456
505 North 7th Street, Suite 3600
St. Louis, MO 63101
Telephone: 314/241-4844
Facsimile: 314/241-3525

cc:
Kurtis B. Reeg
REEG LAWYERS, LLC
1 North Brentwood, Suite 950
St. Louis, MO 63105

Mark C. Surprenant
ADAMS & REESE
4500 One Shell Square
New Orleans, LA 70139

Michael A. Pope
McDERMOTT WILL & EMERY LLP
227 West Monroe Street
Chicago, IL 60606
Attorneys for Syngenta Crop Protection, Inc.

Robert H. Shultz, Jr.
HEYL, ROYSTER, VOELKER & ALLEN
Mark Twain Plaza II, Suite 100
105 West Vandalia Street
Edwardsville, IL 62025

Anne G. Kimball
WILDMAN HARROLD ALLEN & DIXON, LLP
225 West Wacker Drive, Suite 2800
Chicago, IL 60606
Attorneys for Growmark, Inc.