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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS

Civil Action No. 2:14-md-02591

IN RE SYNGENTA AG MIR162 CORN LITIGATION Master File No. 2:14-MD-02591-JWL-JPO MDL No. 2591 Case# 18-cv-2408-JWL-JPO	)))))))))	APPLICANTS (INTERVENORS) REPLY BRIEF Kenneth P. Kellogg, et al v Watts Guerra, LLP, et al.

APPLICANTS (INTERVENORS) REPLY BRIEF

Joanna Burke and John Burke ("Applicants"), hereby respectfully responds to this honorable Court's Order [Doc. 213] in relation to the reactivation of the Burkes' intervenor-application reconsideration and review motion which was previously mooted. The Applicants have noted the latest objections by Plaintiffs [Doc. 216] and Defendants [Doc. 218] and now respond.

In their latest response, **the Plaintiffs** have ‘cut and paste’ the contents of their last objection, Doc. 156 and merely updated it with copies of the Burkes’ current Florida intervention on appeal at the Eleventh Circuit.

It would appear the goal of including the same along with a dump screen of an apparent search trace of *possible* Burke cases since Pacer/ECF was invented is a spiteful but rather feeble attempt to malign the senior citizens character.[1]

Returning to the Plaintiffs filing and exhibits, they have also included the Order of the Florida Federal Court denying Intervenor status along with the Burkes’ relevant pleadings, yet the application is based on *very different* intervenor arguments in law.

In relation to the 11th Circuit appeal, the Burkes strongly oppose the lower Courts ruling and will be citing the Constitution and referencing the undisputable facts. E.g. the Burkes *do* hold an economic interest in that intervention and a journalist had obtained intervention - despite, as Plaintiffs claim against Burkes in this matter – the fact the

[1] When you’ve lived in times when bombs were dropping all around you from the skies above, as the Burkes endured as children during the second world war, and then served your country as a Royal Military Policeman and elite Airborne Paratrooper, as John Burke did, this trivial retaliation is hardly earth-moving. However, it shows again Mr Nill’s statements cannot be taken seriously when you see Mr Nill’s Twitter Account as shown, retweeting about humility – A contradiction.

journalist had no interest, economic or otherwise in the case and yet was allowed permissive intervenor status – and the Burkes see that journalists' Court approved intervention as only promoting the Burkes' application to intervene.

Furthermore, on review of the Florida case with several non-profit activist groups (lawyers who are against social and economic injustice, challenge predatory corporate conduct and government abuses) and prior to making the decision to file an appeal in Florida (due diligence) the lawyers for these non-profit activist groups were in agreement - the Burkes' appeal is justified and holds a strong likelihood of reversal in favor of the Burkes.

Alas, the Plaintiffs have not even addressed the facts as detailed by the Applicants motion for reconsideration and review. It remains undisturbed and without rebuttal. Another resounding example why the Plaintiffs would not adequately represent the Applicants in this action.

Unlike lackadaisical Nill, **the Defendants** have at least identified and responded to the correct document, the Burkes' reconsideration, however, they too fail miserably in answering the Burkes' arguments therein. One can only assume these lawyers have intentionally side-stepped the majority of the Burkes' questions because they have no argument in law which would preclude the Burkes from intervening in this tag-along case, subject to this Courts' approval. Let's expand on this statement further;

Why is this Sygenta case a "tag-along" case? Because it is specifically about lawyer fraud and conspiracy and negligent misrepresentation. And that is exactly why the Burkes' intervened. The *Burke v. Hopkins* case is about lawyer fraud and conspiracy and negligent misrepresentation. Yes, a perfect match.

The Corn Case is a Separate Case. Despite the attempts to dismiss the Burkes' from the tag-along case, the minority lawyers - who are only interested in discarding the intervenors to accelerate their own financial bonanzas - keep referencing the Burkes' are "not corn farmers" and as such have no interest in the case. The Burkes agree. They are not "corn farmers". But the Burkes do not wish to intervene in the Corn MDL case. Specifically, they are intervening in the sub-case, which any reasonable person can patently see is for the purposes of resolving the alleged attorney fraud, conspiracy, legal misrepresentation and/or negligence. Why else would it be separate?

Legal commentator and journalist for Reuters, Alison Frankel presents this 'tag-along' case and Burkes' summary argument in simple form;

> **"Farmers sue their own lawyers at Watts Guerra, claiming fraud in Syngenta GMO case"**
>
> "Three North Dakota farmers filed a class action Tuesday against the Texas plaintiffs' firm Watts Guerra, alleging that Watts and a dozen co-counsel duped nearly 60,000 farmers into signing 40 percent contingency fee agreements in nationwide litigation against the agricultural company Syngenta, then cut secret deals to preserve the contingency fees by excluding Watts clients from state and federal class actions against the company. The Minnesota federal court class action asserts racketeering,

> conspiracy, fraud and state-law claims against Watts and the other defendants. The suit asks, among other things, for a declaration that the contingency fee agreements are void…
>
> The complaint's most controversial allegations, in my mind, involve supposed deals between Watts Guerra and class counsel to keep Watts Guerra's clients in the dark about the class actions.
>
> According to the suit, Watts Guerra signed joint prosecution agreements in both the federal and Minnesota cases. Class counsel agreed to exclude Watts Guerra clients from class certification motions, and in return Watts Guerra allegedly agreed not to oppose class certification and to pay a big chunk of assessed common benefit fees to class counsel.
>
> The complaint contends that the judges who certified the Minnesota and federal classes did not realize that Watts Guerra was not providing class notices to its clients. (According to the suit, Watts Guerra informed clients of the joint prosecution agreements more than a year after they were signed, and then only to let them know they didn't need to opt out of the class.)"
>
> - Alison Frankel, Legal Journalist,
> https://www.reuters.com/article/legal-us-otc-syngenta-fraud-idUSKBN1HW2SB

Is the Tag Along Case Going to Discuss Corn Farming, Sygenta products or Chinese port authority rules for accepting Corn from the USA? The answer to that question must be a resounding NO. The tag-along case is only concerned with the allegations of attorney fraud, conspiracy, deception, fee-splitting, secret agreement(s) and other allegations as identified in the complaint and filings in this matter. Hence, the Burkes' would respectfully ask this Court to take notice of the much-admired Reid, who founded the Scottish School of Common Sense (the Burkes' birth country);

> "If there are certain principles, as I think there are, which the' constitution of our nature leads us to believe, and which we are under a necessity to take for granted in the common concerns of life,' without being able to give a reason for them; these are what we call the principles of common sense; and what is manifestly contrary to them, is what we call absurd."
> — Thomas Reid

The Burkes should be allowed to intervene as a matter of right, or in the alternative, permissively.

> See *Coalition of Arizona/New Mexico for Stable Economic Growth v. Dept. of Interior, et al* 100 F.3d 837 (10th Cir. 1996) – "Dr. Silver's counsel admitted at oral argument that Dr. Silver had little economic interest in the Owl; however, economic interest is not the sine qua non of the interest analysis for intervention as of right. To limit intervention to situations where the applicant can show an economic interest would impermissibly narrow the broad right of intervention enacted by Congress and recognized by the courts. See *Nuesse*, 385 F.2dat 700; *Sierra Club v. Espy*, 18 F.3d at 1207; *Ceres Gulf*, 957 F.2d at 1203 n. 10; Sanguine, Ltd., 736 F.2d at 1420."

As highlighted in the referenced case above, the Burkes' would politely like to guide the honorable Court to the Burkes reconsideration motion, which articulates in great detail the arguments the Applicants wish this Court to consider.

Nevertheless, and for clarification, the Applicants would like to summarize the Burkes' litigation against a wrongful foreclosure in law and why they should be allowed to intervene in a corn farming class action dispute where lawyer fraud, conspiracy, secret

agreement(s) and legal misrepresentation are the core elements in the tag-along case.

The Burkes' Background and Case History

In summation, the Burkes' case(s) translates to one very contentious litigation from 2011-2018 by unsecured creditor[2] 'Deutsche Bank', where the Burkes were defendants and obtained a favorable judgment not once, but twice in the lower court. The Burkes are pursuing two new civil actions against two new parties as shown below and for the reasons explained herein;

Deutsche Bank v. Burke	2011-2015	**Burke Victorious After Trial**; SDTX
Deutsche Bank v. Burke	2016	Deutsche Bank Obtain Remand Order on Appeal
Deutsche Bank v. Burke	2017	**Burke Wins Second Judgment**; SDTX
Deutsche Bank v. Burke	2018	Deutsche Bank Obtain Judgment on Appeal
Burke v. Ocwen	2018	First time Burkes' are Plaintiffs
Burke v. Hopkins	2018	First time Burkes' are Plaintiffs

The Burke's Strategy to 'Flush Out' the 'Real Parties'

[2] See *In re Ditech Holding Corp.*, Case No. 19-10412 (JLG) (Bankr. S.D.N.Y. Aug. 28, 2019) wherein Deutsche Bank National Trust Co. is appointed to the Unsecured Creditors Committee.

The stratagem of the Burkes' after the Fifth Circuit's erroneous decision in the Deutsche case is evident for any person with basic legal knowledge to deduce. If you sue the mortgage servicer (Ocwen) and the debt collector (BDF Hopkins) simultaneously but separately, you should be able to 'flush out' the 'real parties'. Here, until the Ocwen civil action was crudely dismissed in error and is currently on appeal, it flushed out only lawyers, namely BDF Hopkins. In other words, the Burkes' allegations and arguments remain pure. The civil action, in the name of Deutsche Bank National Trust Co., is not, and never has been, a debt owned by unsecured creditor Deutsche Bank National Trust Co., a straw man.

What is important to note is *who* filed the civil action in 2011 and *who* appealed in 2015. That would be BDF and Hopkins respectively. Distinctively deceptive lawyers who are only interested one goal, stealing homesteads by entering into secret agreements, operating shell companies and conspiring to create and forge legal documents as a known *system* of fraud; as discussed herein. Deutsche never appeared in motions nor at trial, everything was from BDF Hopkins, nobody from a bank or non-bank appeared at any time in motions, affidavits or at the bench trial.

The Burke v. Hopkins Case is Related to this Sygenta Tag-Along Case

The Hopkins case is currently proceeding to trial and there is a second scheduling

conference on Sept 10, 2019 before the Hon. Magistrate Judge Peter Bray in Houston to discuss discovery and revise the deadlines. Hopkins is proceeding *pro se* and with only 2 expert witnesses who are Partners (lawyers) from his 'related' firm of BDF.

Included in their complaint, the Burkes' are claiming attorney fraud, conspiracy and legal misrepresentation in this case. However, it is extremely difficult in Texas to overcome the general protection of attorney's in Texas law, who rely upon client-privilege, the attorney-work product protections and attorney-immunity doctrine, and perpetually obtain the support of the Courts in these arguments.

That said, at this point, the Burkes have convinced the Snr Judge Hittner to proceed to trial based on the uncontestable evidence provided by the Burkes, piercing Hopkins claims for immunity and denying as moot the motion to dismiss presented by Hopkins in the case. Hopkins erroneously relying upon 'attorney immunity' and yet is defending the action only with 'insider' attorneys, which in *Warrilow*, was referred to as "corruption".[3] Similar to the alleged actions of the attorneys in this case, Hopkins committed fraud and has recently repeated the fraud in a similar foreclosure case, confirming the *Durbin* system of fraud, an extract of the Burkes' approved Supplemental Motion is recited below:-

"In conclusion, in the two known, current and high-profile, high

[3] "The practice of attorneys furnishing from their own lips and on their own oaths the controlling testimony for their client is one not to be condoned by judicial silence; nothing short of actual corruption can more surely discredit the profession." - Warrilow v. Norrell, 791 S.W.2d 515 (Tex. App. 1990)

revenue and highly contested Texas foreclosure cases which were judged in favor of the homeowners at the lower court, and where Mark Hopkins was the attorney-of-record for the appeal, in both cases, he came to the lower court(s) and immediately presented fake documents and demanded they be allowed into evidence. In both cases the honest judges refused….

"This Court noted the exception to the doctrine of res inter alios acta in *Durbin v. Dal-Briar Corp.* stating, "prior acts or transactions with other persons are admissible to show a party's intent where material, if they are so connected with the transaction at issue that they may all be parts of a *system*, scheme or plan." *Durbin v. Dal-Briar Corp.,* 871 S.W.2d 263, 268 (Tex.App. - El Paso 1994, writ denied) (citing *Underwriters Life Ins. Co. v. Cobb,* 746 S.W.2d 810, 815 (Tex.App. - Corpus Christi 1988, no writ)). Moreover, the rules of civil evidence allow the admission of evidence of the habit of a person, or of the routine practice of an organization, if the evidence is relevant to prove that the conduct of the person or organization on a particular occasion was in conformity with the habit or routine practice. See Tex.R. Evid. 406; see also *Durbin*, 871 S.W.2d at 268."

In the tag-along Sygenta case, it is alleged that the lawyers also committed fraud, colluded with each other for financial greed and similarly, could easily be perceived as a *system*.

In the Burkes case, Hopkins also withheld evidence, the mortgage file, and admitted this on the record. This was an intentional act, as he could not appeal the case (he was the newly appointed appellate counsel after Deutsche lost the case after the bench trial) if he had provided the mortgage file - which proved the Burkes' arguments and hence could not possibly obtain a reversal on appeal. By withholding the mortgage

file, he did, by fraud, obtain reverse and remand of the lower courts' decision on appeal. It was a premeditated and calculated act, which he did so with his co-conspirator, his now-wife, Shelley Luan Hopkins (nee Douglass) who was a former senior employee at BDF when the Burkes' action commenced in 2011, until she left and married Mark Hopkins in 2013, and subsequently joined him in his law business as an attorney at [BDF] Hopkins.

In the tag-along Sygenta case, the lawyers similarly withheld evidence from the farmers. Discovery should include the fee agreement(s) and other documentation or emails which could identify, fraud, conspiracy, collusion and fee-splitting etcetera. The Burkes' would most certainly like to recover this information, if allowed to intervene, independent of slothful Nill and over the objections of unsavory Watts, who have made it abundantly clear they have their own calculated agendas in this matter - financial greed.

On the contrary, the Burkes seek this constructive evidence to correct a wrong in Texas (the Burkes action) and in Kansas (the Farmers action). The Court can clearly see jurisdiction for both States in this case. For example; the lawyer(s) and his firm called Watts Guerra, LLP, alleged to have committed these fraudulent acts, operates its business from San Antonio, Texas. Watts Guerra added class members to Court actions in Texas. The Hopkins and BDF entities operate their business(es) in Texas. Mikal

Watts is a licensed attorney with the State Bar of Texas. He resides in Texas. Mark Daniel Hopkins and Shelley Luan Hopkins are licensed attorneys with the State Bar of Texas. They also reside in Texas. The Burkes are citizens of the State of Texas. They reside in Texas. The Court should also be aware that BDF Hopkins has referenced the Burkes' Intervention-Application in this matter and asked the Southern District of Texas Federal Court take 'judicial notice'[4] of this intervention.

These facts support intervention and ensuring that Watts Guerra does not repeat these alleged fraudulent acts to others in Kansas *or* Texas using civil actions, class actions or any Court of law. This law suit has the potential to be a published precedent and one which could be cited in Kansas and Texas. This could impact the Burkes' and the Farmers in future litigation. In order to protect their interests, the Applicants seek to intervene.

Furthermore, it is a morally different type of intervention and an honest one which seeks to restore ethics and civility to lawyers who present the legal community in Courts nationwide and who, in this case, have clearly shown they are only interested in how much money they can purloin from a corporation or their 'clients' and citizens. Unfortunately, both the Plaintiffs and Defendants lawyers in this tag-along case know no boundaries when it comes to financial avarice as discussed, and hence have no morals and would *not* adequately represent the Burkes' interests in this matter.

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[4] See Burke v. Hopkins, SDTX, Case 4:18-cv-04543, Doc. 13

Nill Reneged On Paying His Law Partners and Watts was Indicted in Texas

Nills and Mikal Watts of Watts Guerra have both represented themselves '*pro se*' in litigation. Money-grabbing Nills was sued for not sharing his $14.5 million dollar class-action windfall as contractually agreed with his 2 former legal partners and lawyer and Texas Democratic Super-Donor Watts was in a far more serious matter, where he was indicted in the much publicized BP Oil Spill class action scandal and represented himself at trial.[5] The allegations against Watts included making up straw applicants, who were either dead, or were subsequently found on audit review to actually be a pet (a dog)...

> "Mikal, you know I say this with love in my heart so hear me on this, this is either a super plan for a billion dollar success that I just don't see ...it is a 'king has no clothes' cluster f— that needs to be dealt with openly, quickly, and effectively."

– Extract from Watts BP Oil Texas Criminal Indictment

Mikal Watts was indicted as a result of a class action lawsuit in Texas, wherein the personal financial gain from his legal 'bet' would make even Warren Buffett turn his head. Watts is known in Texas for seeking class actions where the settlements will be in the Billions, rather than Millions. In order to achieve these results, however, it would strongly appear, based on past actions, Watts is willing to skirt the law, as it is

[5] See "Mikal Watts' fraud and identity theft indictment unsealed; A Dog was among plaintiffs in BP oil spill litigation" (Nov. 2015) https://lawsintexas.com/mikal-watts-watts-guerra-law-firm-san-antonio-successfully-obtained-billions-in-class-action-awards/

alleged here. In preparing this reply brief, the Burkes' decided to review only the Southern District of Texas Federal Court records (where *Burke v Hopkins* case now resides), and noted, as one example, a 'tag-along' Whistleblower action against BP, which was dismissed by Snr. Judge Hughes, but not before he released his damning assessment of Watts false claims (as lawyer(s) for Abbott);

> 8. *Damages.*
>
> Abbott initially said that the United States should recover more than $266.4 billion. His technician, Scott A. Bayley, CPA, concluded that the value of the Atlantis field is approximately $88.8 billion – $32 billion from past production and $56.8 billion from expected production. He then trebled the $88.8 billion.
>
> Bayley is not an expert. He has imagined standards for recovery and economics. Instead of using data about historic prices, he interpolates backwards from estimates about future prices. His report is a press release, not a serious, analytical study of the value of the field. It will be struck.

BP Oil Texas 'WhistleBlower' Case by Watts – Judge Hughes Opinion;
Abbott v. BP Exploration and Production Inc (4:09-cv-01193),
District Court, S.D. Texas

In other words, Nill and Watts are both before this Court with serious prior civil and criminal controversies respectively.[6]

Morally and ethically, the Burkes do not align with either, hence, this is a very good reason, along with the fact both parties have objected to the Applicants, why the

[6] "A man who never graduated from school might steal from a freight car. But a man who attends college and graduates as a lawyer might steal the whole railroad." - Theodore Roosevelt, 26th President of the United States (1901-1909)

Burkes seek direct intervenor status, or, in the alternative, permissive intervenor approval.

Summarizing the Objections of Nill and Watts (and responding Attorney for Watts) who are objecting to the Applicants Intervention on behalf of the Plaintiffs and Defendants in the tag-along case; The Burkes asked several questions in the reconsideration motion and only the Defendants partially answered. The questions which were unanswered were as follows;

(1) Does this Court uniformly dispute the Tenth Circuit's position opined below?

"Our court has tended to follow a somewhat liberal line in allowing intervention." See *Dowell v. Board of Ed. of Okla. City*, 430 F.2d 865, 868 (10th Cir. 1970)." – citing *National Farm Lines v. Interstate Commerce Commission, and National Motor Freight Traffic Association, Inc., Regular Common Carrier Conference, and Common Carrier Conference Irregular Route, to Intervene- Appellants,* 564 F.2d 381 (10th Cir. 1977).

(2) Can this Court deny the Application when the Intervenor-Applicants have proven the Plaintiffs demonstrate adversity of interest, collusion and/or nonfeasance? When the intervenor and the party to the suit have the "same ultimate objective", the party to the suit is presumed to adequately represent the intervenor. [as claimed by this Court but denied by the Intervenor-Applicants].

(3) Should this Court deny the Application in totality, or merely restrict the

Intervenors? For example, when a 'nonparty' seeks to intervene for the sole purpose of gaining access to documents subject to a confidentiality order and/or access to documents under seal and where the 'Question of Law' revolves around 'secret' fee agreements, privity and attorney immunity where the immunity claimed is legally flawed and access to sealed documents should be made open and available to the nonparties – denial of which will impact the Applicants in their own case in Texas?

See *Equal Employment Opportunity Commission, Appellee, v. National Children's Center, Inc*., *Appellee. Lillie Grier, Individually and As Mother and Next Friend Oflinita Grier, Appellant*, 146 F.3d 1042 (D.C. Cir. 1998).

"Several courts have held that the movant can satisfy the requirement **by raising a common question in a suit in another jurisdiction**. See *United Nuclear Corp*., 905 F.2d at 1427; *Meyer Goldberg, Inc*., 823 F.2d at 162.

The Burkes respectfully request this Courts' permission by intervention to see those 'agreements' and related documents, which are not available to the Burkes and can only be obtained by intervention but will assist the Burkes' in their own civil action, which mirrors this case as far as the "common question of law or fact" is concerned. See Intervenor appeal case;

"The right of access to court proceedings and records also is firmly grounded in the common law." *Mosallem*, 76 A.D.3d at 348, quoting *Gryphon Dom.*, 28 A.D.3d at 324 (internal quotation marks and citations omitted). This right of access also derives from the constitutional

> "presumption, arising from the First and Sixth Amendments, as applied to the states by the Fourteenth Amendment, that both the public and the press are generally entitled to have access to court proceedings." Id. at 348-49 (citations omitted).

Indeed, the availability of a separate lawsuit cuts against intervention as of right. See *San Juan County*, 420 F.3d at 1210 (strongest case for intervention of right exists where intervenor has no claim, not where he and/or she could file independent suit); *Lucero ex rel. Chavez v. City of Albuquerque*, 140 F.R.D. 455, 459 (D.N.M. 1992) (intervention of right denied where party has ability to vindicate rights in separate action).

The Burkes' respectfully conclude the gravamen of this tag-along case relates to lawyer fraud, conspiracy and 'secret' fee agreements. They could not successfully file a separate civil action in this case.

In support of the Applicant-Intervenors final argument, intervention is the proper method available to the Applicants in this case and as such, the Courts only question is not whether Intervention is applicable, but rather, whether Intervention as a right or Permissive Intervention should be granted.

CONCLUSION & PRAYER

The Applicants satisfy the right to intervene in the action pursuant to Fed. R. Civ. P. 24(a) and the Applicants satisfy the requirements for permissive intervention. The

Applicants respectfully requests this Court reconsider its denial and grant the Applicants motion for Intervention pursuant to Rule 24(a) or, alternatively, Rule 24(b).

RESPECTFULLY submitted this 5th day of September, 2019.

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CERTIFICATE OF SERVICE

We, Joanna Burke and John Burke hereby certify that on September 5, 2019, we posted the attached document via USPS Priority Mail to the US District Court;

Clerk of Court
United States District Court For The District of Kansas
Robert J. Dole Courthouse
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And also served copies to the following parties, by USPS Standard Mail:

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