

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: NAVISTAR DIESEL ENGINE) Case No. 11 C 2496
PRODUCTS LIABILITY) MDL NO. 2223
LITIGATION)

This Document Relates to: All Cases

DECLARATION OF FRED CORIGLIANO
IN SUPPORT OF PRELIMINARY APPROVAL OF CLASS SETTLEMENT

I, Fred Corigliano, declare as follows:

1. I am a competent adult, over the age of eighteen, and I am the secretary and treasurer of Frank Brown Towing, Inc., one of the Class Representative Plaintiffs in *In re: Navistar Diesel Engine Products Liability Litigation*, and I am making this declaration on behalf of FBTI

2. This declaration is based upon my personal knowledge and, if called as a witness, I could and would testify competently thereto.

3. Frank Brown Towing, Inc. ("FBTI"), is named as a class representative in this case. I am the secretary and treasurer of FBTI and was the representative of FBTI primarily responsible for working with Plaintiffs' counsel on this litigation. Accordingly, I am generally familiar with the work involved in prosecuting the class actions against Ford relating to the defects in Ford's 6.0-liter diesel engine and Ford's failure to properly repair the engine.

4. FBTI is a class member because it purchased a Ford vehicle with the 6.0-liter diesel engine, and because it had warranty repairs by a Ford dealership in New York to components including injectors, EGR valves, EGR coolers, turbo chargers, and/or oil coolers to FBTI's Ford vehicle.

5. I and other FBTI employees provided Plaintiffs' counsel with relevant and helpful information for this lawsuit regarding FBTI's experience with its Ford truck, including its purchase of the truck; the malfunctions experienced with the truck; my attempts to have the truck repaired at a Ford dealership; my discussions with Ford mechanics regarding the truck's malfunctions, defects and attempted repairs; and FBTI's damages resulting from same.

6. I have been in regular email and phone contact with Plaintiffs' attorneys and their staff throughout the prosecution of this case and have been kept apprised of key developments in the litigation. I am generally familiar with the factual and legal issues in this case through my correspondence and communications with Plaintiffs' attorneys and their staff. I have also been informed about the terms of the proposed settlement which is before the Court.

7. After reviewing and discussing the terms of the proposed settlement with Plaintiffs' attorney and considering the issues in the case, FBTI has concluded that the proposed settlement obtained on behalf of the Class is fair and reasonable to the Class members in light of the circumstances. FBTI also believes that the attorneys' request for fees is reasonable and appropriate.

8. I believe that FBTI has fairly represented the absent Class members and herein request that the Court finally approve this settlement, confirm FBTI as a Class Representative, and grant the request for attorneys' fees and costs in this case.

9. I am not aware of any conflicts of interest that prevent FBTI from being confirmed as Class Representative in this lawsuit. FBTI's employees and owners are not related in any way to Plaintiffs' attorneys or to any other member of the firms that are representing FBTI. FBTI has no business dealings or other involvement with Plaintiffs' counsel beyond this lawsuit and this representation. Neither I nor FBTI, have been promised any money or inducement to serve as Class Representative in this action.


10. I request that the Court award FBTI a fair and reasonable service award to compensate FBTI for the work that I and other FBTI employees have performed on behalf of the class as part of FBTI's role as Class Representative, as well as the disruption to FBTI's business that has resulted from FBTI's service as Class Representative.

11. In addition to the work described above, FBTI has made its truck available for inspection on multiple occasions by counsel and/or experts retained by Plaintiffs and/or Defendants, causing significant disruption to FBTI's business. FBTI, via efforts by myself and other employees, has also assembled voluminous records evidencing the purchase, repairs, attempted repairs, malfunctions, and use of FBTI's Ford 6.0L truck. Ford deposed me, and I spent significant time being deposed by Ford and working with FBTI's attorneys to prepare for my deposition.

12. As Class Representative, FBTI (through my efforts the efforts of other FBTI employees) actively participated in the litigation and always maintained the best interests of the Class while performing its Class Representative duties.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 22 day of October, 2012 at Tonawanda, New York.


Fred Corigliano
Frank Brown Towing, Inc.