

EXHIBIT 10

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**In re: NAVISTAR DIESEL ENGINE) Case No. 11-cv-2496
PRODUCTS LIABILITY LITIGATION) MDL No. 2223
)**

This Document Relates to: All Cases

DECLARATION OF ROBERT K. SHELQUIST

I, Robert K. Shelquist hereby declare under penalty of perjury as follows:

1. I am over the age of eighteen years and am fully competent to make this declaration. I make this declaration based upon personal knowledge unless otherwise indicated.

2. I am a partner with Lockridge Grindal Nauen P.L.L.P., and a member of the Plaintiffs' Steering Committee in this action. I am a member in good standing of the bar of the State of Minnesota. I respectfully submit this declaration in support of Plaintiffs' Motion for Attorneys' Fees, Expenses, and Service Awards. I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

3. Lockridge Grindal Nauen P.L.L.P., a law firm with offices in Minneapolis, MN and Washington D.C., is experienced in the prosecution of complex and class action litigation, focusing on antitrust, products liability, consumer fraud, employment, securities and environmental matters. Attached hereto as Exhibit 1 to this Declaration is a true and correct copy of Lockridge Grindal Nauen P.L.L.P.'s firm overview, showing some of the firm's experience in complex and class action litigation, as well as leadership

positions to which the firm has been appointed. This resume is not a complete listing of all cases in which the attorneys at Lockridge Grindal Nauen P.L.L.P. have been Class Counsel or otherwise counsel of record.

4. I have extensive experience in the litigation, trial, and settlement of complex class action cases. Cases in which I have served as Class Counsel or had prominent roles include:

a. *In re CertainTeed Corp. Roofing Shingle Products Liability Litigation*, MDL 1817. I served as co-lead counsel on behalf of CertainTeed shingle owners.

b. *In re Medtronic, Inc. Sprint Fidelis Leads Products Liability Litigation*, MDL 1905. I served as a member of the Plaintiffs' Steering Committee and also serve as Liaison Counsel.

c. *In re Kitec Plumbing System Products*, MDL 2098. I serve as co-lead counsel.

d. *In re Zurn Pex Plumbing Products Liability Litigation* MDL 1958. I served as co-chair of the Plaintiffs' Steering Committee.

e. *In re IKO Roofing Shingle Products Liability Litigation*, MDL No. 2104. I serve as co-lead counsel.

f. *In re Northstar Education Finance, Inc. Contract Litigation*, MDL 1990. I served as lead counsel.

5. Lockridge Grindal Nauen P.L.L.P.'s historical class action rates, which were used for purposes of calculating the lodestar here, are based on prevailing fees for

national class-action work, and have been approved by multiple courts across the country. Lockridge Grindal Nauen P.L.L.P.'s rates for attorneys and staff were approved in the following cases:

a. *In re Medtronic, Inc. Sprint Fidelis Leads Products Liability Litigation*, MDL 1905, District of Minnesota, Civil Action No. fees were approved for Richard A. Lockridge at \$625.00 per hour and Robert K. Shelquist at \$600.00 per hour.

b. *In re CertainTeed Corp. Roofing Shingle Products Liability Litigation*, MDL 1817, Eastern District of Pennsylvania, Civil Action No. 2:07-md-1817 fees were approved for Richard Lockridge at \$625.00 per hour, Robert K. Shelquist at \$525.00 per hour, Elizabeth Odette at \$275.00 per hour, Constance Hartel at \$300.00 per hour, and Kelly LeRoy at \$175.00 per hour.

c. *In re Genetically Modified Rice Litigation*, MDL 1811, Eastern District of Missouri, Civil Action No. 4:06-md-1811 CDP, fees were approved for Richard A. Lockridge at \$650.00 per hour, and Robert K. Shelquist at \$600.00 per hour.

d. *Dale Fluegel, et al. v. FedEx Ground Packaging System, Inc.*, Northern District of Illinois, Civil Action No. 1:05-cv-02326, fees were approved for Scott A. Moriarity at \$375.00 per hour.

e. *In re Northstar Education Finance, Inc. Contract Litigation*, District of Minnesota, MDL 1990, Civil Action No, 8-md-01990, fees were approved for Richard A. Lockridge at \$625.00 per hour, Robert K. Shelquist at \$525.00 per

hour and Kelly J. LeRoy at \$175.00 per hour. These rates were submitted as a lodestar cross check.

6. Most recently, the Court in *In re Zurn Pex Plumbing Products Liability Litigation* MDL 1958, District of Minnesota, Civil Action No. fees were approved for Richard Lockridge at \$675.00 per hour, Robert K. Shelquist at \$650.00 per hour, Rick Linsk at \$325.00 per hour, and Kelly J. LeRoy at \$175.00 per hour.

7. Lockridge Grindal Nauen P.L.L.P. continues to work on the administration of the settlement and the fees for attorneys Krista K. Freier, Kevin T. Ravenscroft and Kirsten E. Robinson were capped by lead counsel at \$250.00 per hour and were being billed at that rate when the settlement had been reached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 4th day of April, 2013 at Minneapolis, Minnesota.

/s/Robert K. Shelquist
Robert K. Shelquist