

# **EXHIBIT 11**

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

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

**This Document Relates to: All Cases**

**DECLARATION**

The rates charged by Glassman, Edwards, Wyatt, Tuttle & Cox, P.C. are competitive with rates charged nationally for National Class Action work and other complex litigation commonly litigated by Tim Edwards, Todd Murrah and Ed Wallis, counsel of record in this cause. Similar rates or greater have been paid in the following cases:

1. In Re: Trasylol Products Liability Litigation – MDL No. 1928, United States District Court, Southern District of Florida, Cause No. 1:08-MD-01928.
2. In Re: Watson Fentanyl Patch Products Litigation – MDL No. 2372, United States District Court, Northern District of Illinois, Eastern Division, Case No. 12-cv-06296, MDL No. 2372
3. In Re: Medtronic, Inc. Sprint Fidelis Leads Products Liability Litigation – MDL No. 08-1905, United States District Court, District of Minnesota
4. In Re: Pelvic Mesh/Gynecare Litigation – MDL No. 291, Superior Court of New Jersey Atlantic County-Law Division, Master Docket No. L-6341-10, Civil Action J&J Litigation, Case No. 291

5. In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation – MDL No. 2327, United States District Court, Southern District of West Virginia
6. In Re: C.R. Bard, Inc., Pelvic Repair System Products Liability Litigation – MDL No. 2187, United States District Court, Southern District of West Virginia
7. In Re: Boston Scientific Corp. Pelvic Repair System Products Liability Litigation – MDL No. 2326, United States District Court, Southern District of West Virginia
8. In Re: American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation = MDL No. 2325, United States District Court, Southern District of West Virginia
9. In Re: Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Relevant Products Liability Litigation = MDL No. 2100, United States District Court Southern District of Illinois

The firm's total fees and expenses in this case for its clients in three states totals \$76,473.09 and is based on fee rates of \$450.00 for Tim Edwards, \$375.00 for Todd Murrah and \$375.00 for Ed Wallis.

In sum, the attorney's fees generated by this firm in its representation of its clients are very modest and well within the bounds of reasonable fees charged for similar services provided.

**GLASSMAN, EDWARDS, WYATT,  
TUTTLE & COX, P.C.**



TODD B. MURRAH

DATE: 4-11-13

Attorneys for Johnny Quiroz, Dennis Tackler  
And Joe Waggoner