

EXHIBIT 18

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

CASE NO: 1:11-cv-02496

In Re: Navistar 6.0 L Diesel Engine Products
Liability Litigation

The Honorable Matthew F. Kennelly

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DECLARATION OF PETER J. CAMBS, SR.,

The undersigned, Peter J. Cambs, Sr., of Parker Waichman LLP submits this Declaration to the Court in support of counsel fee application.

A. LITIGATION, TRIAL AND APPELLATE EXPERIENCE.

Since admission to the bar 29 years ago, I have taken approximately 125 jury cases to *verdict* in both New York State Supreme and Federal District Courts, and was solely responsible for briefing and arguing 35 reported appeals. I have conducted well in excess of 2,000 depositions. Many of these cases involved class action litigation, as well as single-event cases of serious injuries, death and significant economic damages due to motor vehicles and product design defects. My undergraduate degree in Industrial Technology, included extensive study of *Transportation and Power Technology; Internal Combustion Engine Design; Manufacturing Systems and Production Planning* (study of applying managerial and organizational principles and functions to the operation of a manufacturing enterprise); *Engineering Drafting & Design; Electronics Technology* (solid-state, laser and digital principles, including laboratory applications of electronic instrumentation); and *Transportation Systems* (study of propulsion, vehicles, landways, airways, waterways, space, research and development). As such, I am well-versed

with government regulations applicable to automotive design and manufacture, including the *Federal Motor Vehicle Safety Standards and Regulations*, as well as non-governmental standards promulgated by *SAE*, *ANSI*, *ASTM* and *AAM*. This training and experience were of great benefit in the Navistar litigation due to the prevalence of automotive engineering and design issues.

I have earned and maintained the highest Martindale-Hubbell peer-rating: "AV-Preeminent Lawyer. Apart from my experience, my firm, Parker Waichman LLP, is nationally recognized as a leader in the field of mass tort litigation and has also been given the highest peer review rating: *AV Preeminent 5.0 out of 5*.

The New York State Bar Association invited me to speak at numerous continuing legal education programs. Topics presented by me included: *Investigating Truck Accidents and Accident Reconstruction*; *Cross Examining the Accident Reconstruction Expert*; *Gathering Meaningful Discovery in Trucking Accidents -- Collection & Preservation of Event Data Recordings*; *Jury Selection Techniques*; *Litigation & Deposition Strategies and Discovery*; *Closing Arguments From the Defense and Plaintiff's Perspectives*; *Settling Personal Injury Claims with Ethical Integrity. Civil Practice—The Trial*; *Investigation of the Case and Use of Experts in the Early Stages of a Case*; *Arbitration and Alternative Dispute Resolution for Business*. I have written peer-reviewed articles, such as: *Liability of Component Part Manufacturers: At what stage Do Component Parts Become Finished Products?*

Regarding litigation experience with claims for damages in class action litigation involving consumer trade and marketing practices, examples of my experience includes serving on the Plaintiff Steering Committee in the following cases: *In Re Apple iPhone 3G and 3GS Marketing and Sales Practices*, MDL- 2116. *In re: Light Tobacco Marketing Litigation Sales Practices Litigation*, MDL-2068; Trial Team Member *In Re Chinese Manufactured Drywall*

Product Liability Litigation, MDL- 2047. In re: Verizon Wireless Data Charges Litigation, MDL No. 241, Lee-Bolton et al v Koppers Inc., et al 1:10-cv-00253 (FL ND), My hourly rate for the all of the aforementioned litigation is/was \$650, and this rate is based upon prevailing fees for national class-action litigation. Additional rates for Paralegal, Law Clerk and Senior Partner/Shareholder is based upon the prevailing fees for national class-action litigation.

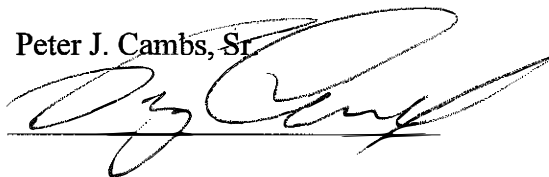
My firm has been involved in multi-district litigation and has received appointments to the following: Executive Committee for Prozac Multi-District Litigation No. 907; Plaintiffs' Steering Committee for the World Trade Center Bombing Litigation; New York State Diet Drug – Steering Committee for Fen-Phen; New York State Steering Committee for Rezulin Litigation; Plaintiffs' Steering Committee and Discovery Subcommittee – Zyprexa Multi-District Litigation No. 1596; Member of the Executive Committee of the Plaintiffs' Steering Committee, MDL #1742, In re Ortho Evra Products Liability Litigation; Co-Chair, Ortho Evra Litigation Group; Plaintiff's Steering Committee Kugel Mesh Multi-District Litigation No. 1842; Plaintiff's Steering Committee for the New York State Bausch & Lomb, ReNu with MoistureLoc Litigation as well as the Plaintiff's Steering Committee Gadolinium Multi-District Litigation No. 1909; Co-Chair, Discovery Committee Vytorin Multi-District Litigation No. 1938; Plaintiff's Steering Committee Chinese-Manufactured Drywall Multi-District Litigation No. 2047; Plaintiffs Steering Committee for Yasmin & Yaz (Drospirenone) Marketing, Sales Practices & Products Liability Multidistrict Litigation No. 2100; Discovery Sub-Committee for Yasmin & Yaz (Drospirenone) Marketing, Sales Practices & Products Liability Multidistrict Litigation No. 2100; Plaintiffs Steering Committee for Heparin Multi-District Litigation No. 1953; Co-Lead Plaintiffs Steering Committee for Denture Cream Multi-District Litigation No. 2051; Discovery and Expert Sub-Committees of the Plaintiffs' Steering Committee for the Denture Cream Multi-

District Litigation No. 2051; and Discovery and Law & Briefing Sub-Committees for Denture Cream Multi-District Litigation No. 2051.

Dated and affirmed this 5th day of April, 2013.

Respectfully submitted,

Peter J. Cambs, Sr.

A handwritten signature in black ink, appearing to read "Peter J. Cambs, Sr.", written over a horizontal line.

Peter J. Cambs, Sr. (#101276)
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