

EXHIBIT A

MEMO

To: All Plaintiffs' Counsel in *In re: Navistar Diesel Engine Products Liability Litigation*, MDL No. 2223; Case No. 11 C 2496

From: Michael A. Caddell

Date: June 10, 2011

Re: Time and Expense Records and Summary Reports

My office is responsible for collecting and summarizing plaintiffs' counsels' time and expense records in this case. All plaintiffs' counsel who intend to seek Court-awarded attorneys' fees or expenses in connection with this litigation must keep daily records of their time and expenses incurred, indicating with specificity the tasks performed each day. Such counsel shall, by the 20th day of each month, submit to Caddell & Chapman Summary Reports of their time and expense records for the preceding month in the manner and format set forth herein. We will begin collecting your time on July 20, 2011.

I. GENERAL PROVISIONS

Each firm is required to maintain contemporaneous and detailed time and expense records, which include a detailed description of all expenses incurred and work performed, that supports the amounts listed in the Summary Reports. A copy of the detailed time and expense records is to be electronically submitted with the time and expense Summary Reports. Please bill your time in tenth-of-an-hour increments. The Time Summary Report Form and Expense Summary Report Forms (Shared and Held) are in Excel format and attached as Exhibits A, B and C.

The initial time and expense Summary Reports shall cover the time period from inception through the end of June 2011. Subsequent Summary Reports shall be done on a monthly basis. Please keep current with your time and expense reporting. Failure to do so will be considered in any fee allocation and may be grounds for denying court-awarded attorneys' fees in whole or in part.

To avoid unnecessary expenditures of time and funds, and to avoid duplicative or inefficient work, plaintiffs' counsel must obtain authorization from Lead Counsel before expending any time or expenses in this litigation. From June 1, 2011 forward, **only** time and expenses spent and incurred on matters beneficial to all claimants will be considered in the MDL. Explicit authorization by Lead Counsel is required. "Read and review" time associated with pleadings or other materials submitted to the Court will not be compensated unless you were assigned to work on the particular submission or issue. Time spent on clerical activities (including maintaining the file, printing, organizing, etc.)

will not be compensated. No time or expense spent seeking new clients will be considered or should be submitted on behalf of the Class, unless otherwise approved by Lead Counsel. Any time submitted in violation of these instructions will be disallowed.

Time and expense Summary Reports shall be submitted electronically to Liaison Counsel at jcd@caddellchapman.com, with a copy to csf@caddellchapman.com. If any firm is unable to submit their time and expense reports electronically, the reports may be submitted via fax or mail as follows:

John C. Dessalet
Caddell & Chapman
1331 Lamar, Suite 1070
Houston TX 77010-3027
Telephone: 713.751.0400
Facsimile: 713.751.0906
jcd@caddellchapman.com

Please do not hesitate to contact Lead Counsel with any questions regarding the time and expense reporting requirements.

II. EXPENSE SUMMARY REPORTS

Your expense Summary Reports should itemize out-of-pocket, case-related expenses in the column for the current monthly amounts and the column for the cumulative amounts. If there is a "Miscellaneous/Other" expense item on a Summary Report, please describe on that month's report the nature of the "Miscellaneous/Other" item. Routine office supplies are not to be included as case expenses. Good judgment shall be used on travel and other expenses, and shall be kept within reasonable limits. Airline travel is to be billed at coach fare; any upgrades will be at the individual's own expense.

A. Common Shared Expenses

Expenses of a substantial nature under the following categories shall be considered Common Shared Expenses:

1. Court, filing and service costs
2. Deposition and court reporter costs
3. Document Depository; Creation and Administration
4. Expert witness and consultant fees
5. Extraordinary postage (mass mailing)
6. Printing, copying, coding, scanning (outside vendor or extraordinary and related solely to common issues)
7. Steering Committee group meetings and expenses as approved by Lead Counsel

8. Research by outside third-party
9. Telephone conference calls (third-party)
10. Common Witness expenses including travel

B. Held Expenses:

The following expenses are not considered Common Shared Expenses, but shall be classified as Held Expenses:

1. Fax charges
2. Meals and Entertainment
3. Office administration
4. Postage, Shipping, Courier, Certified Mail
5. Printing & Photocopying (in-house)
6. Computerized research - Lexis/Westlaw
7. Secretarial and staff overtime
8. Supplies
9. Telephone - local and long distance
10. Temporary Personnel
11. Travel - non-common witness, attorney for deposition, court, or legislative hearings, including:
 - a. Airfare (Coach rate)
 - b. Reasonable ground transportation
 - c. Hotel up to \$250/night or the average of Hyatt, Hilton and Marriott hotel rates in that city
 - d. Reasonable meals
 - e. Reasonable other (e.g., parking)
12. Assessments
13. Bank charges/Interest
14. Car rentals, cabs, etc.
15. Investigative Services

III. SUBMISSION OF COMMON SHARED EXPENSES

The attached Common Shared Expense Summary Report (Exhibit B) shall be completed and submitted with copies of receipts and logs.

IV. SUBMISSION OF HELD EXPENSES

The attached Held Expense Summary Report (Exhibit C) shall be completed and submitted with copies of receipts and logs.

V. SUBMISSION OF TIME SUMMARY REPORTS

On the time Summary Report, please list the name and title (*i.e.*, partner, associate, paralegal, etc.) of all persons in your firm who worked on the case, the current number of hours each individual worked for the reported month, the current rate in effect for each individual for that month, the current monthly lodestar (fee) amount, the cumulative hours, and the cumulative lodestar. Once an individual appears on the time report, they shall remain on the time report with the cumulative amounts carried forward on all future reports. The cumulative columns are running totals based on historical amounts. Changes to the cumulative amounts only occur when new monthly amounts are added to the cumulative amounts from the previous report. If there are no new current amounts, the cumulative totals remain the same. Hourly rate changes shall not be applied retroactively to change cumulative totals.

A detailed description of all monthly time in the format below also shall be submitted in support of Exhibit A by the 20th of each month. For each entry, you must include the date, description of activity, timekeeper name, and time (.1 hour increments).

For example:

Date	Activity	Name	Time
9/10/11	Document review – Documents bates stamped Ford00000003456234 - 00000003458000	John Doe	3.3
9/12/11	Meeting with law committee re claims to assert in Master Complaint; research re Arizona statutory claims	Jane Roe	2.4
9/15/11	Travel to Chicago for hearing before Judge Kennelly	John Doe	3.7
9/18/11	research re class certification	Jane Roe	4.1

VI. DISPUTES REGARDING ALLOWABLE TIME AND EXPENSES

You are directed to the Court's June 2, 2011 Order Regarding Management of Timekeeping, Attorneys' Fees, and Costs Reimbursement Issues (Dkt. No. 18) regarding the Fee Committee and procedures for resolving objections to the Fee Committee's recommendation. Please note that each attorney is responsible for complying with the procedures and guidelines set forth herein and in the Court's Order. Neither Lead Counsel nor the Fee Committee has any obligation to review your monthly time and expense reports and notify you of any problems evidenced therein (such as improper billing format, inclusion of unbillable time or expenses, or billing for unassigned work).

We look forward to working with you on this important case and are optimistic regarding the outcome.

Regards,

Michael A. Caddell
Cynthia B. Chapman
Cory S. Fein
Caddell & Chapman
1331 Lamar, #1070
Houston TX 77010
713.751.0400 (phone)
713.751.0906 (fax)
mac@caddellchapman.com
cbc@caddellchapman.com
csf@caddellchapman.com

Firm:
Month:

**FORD 6.0 DIESEL ENGINE TIME SUMMARY REPORT
COMMON SHARED EXPENSE SUMMARY REPORT**
FROM _____ THROUGH _____

	TOTAL
Court, filing and service costs	
Deposition and Court Reporter Costs	
Document Depository	
Expert Witness and Consultant Fees	
Extraordinary postage (mass mailing)	
Printing, copying, coding, scanning (outside vendor or extraordinary and related solely to common issues)	
Committee group meetings as approved by Lead Counsel	
Research by outside third party	
Telephone conference calls (third party)	
Common Witness expenses including travel	
TOTAL COSTS	

*Please attach documentation for each expense reported.

Firm:
Month:

**FORD 6.0 DIESEL ENGINE TIME SUMMARY REPORT
HELD EXPENSE SUMMARY REPORT**

TOTAL

Client Costs/Expenses	
Fax Charges	
Meals	
Postage, Shipping, Courier, Certified Mail	
Printing & Photocopying (in-house)	
Computerized Research-Lexis/Westlaw	
Staff overtime	
Telephone-long distance	
Travel-attorney for deposition, court or legislative hearing	
Airfare (coach rate)	
Reasonable Ground Transportation	
Hotel up to \$200/night or the average of Hyatt, Hilton, and Marriott hotel rates in that city	
Reasonable meals	
Reasonable other (parking, etc.)	
Assessments	
Car rental, cabs, etc.	
Miscellaneous charges	
Investigative Services	
TOTAL COSTS	

*Please attach documentation for each expense reported.