

EXHIBIT 20

**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 PATRICK W. PENDLEY IN SUPPORT OF PLAINTIFFS'
MOTION FOR AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF
EXPENSES**

I, Patrick W. Pendley, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of Louisiana. I am a partner in the law firm Pendley, Baudin & Coffin, L.L.P., Class Counsel for Plaintiffs and Class Members in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto. I submit this declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees, and Reimbursement of Expenses.

2. My curriculum vitae is attached as Exhibit 1, containing my legal background and experience in litigating complex and class action cases.

3. Pendley, Baudin & Coffin, L.L.P. has been involved in the drafting and filing of cases in this litigation, as well as extensive participation in the investigation and discovery process.

4. Pendley, Baudin & Coffin performed extensive work in researching and drafting federal and state court complaints. Furthermore, my firm spent substantial time and effort reviewing thousands of documents produced by Ford through discovery, summarizing

depositions, and researching and analyzing the various legal and factual issues involved in this litigation.

5. My firm committed a significant amount of resources and time to this litigation solely on a contingency fee basis.

6. I have reviewed the time and expense reports, attached hereto as Exhibit 2, which are maintained by my firm in the ordinary course of business.

7. The time and expense reports attached hereto show that the total attorneys' fees and expenses to be reimbursed to Pendley, Baudin & Coffin is \$154,421.83. The time and expenses shown are reasonable considering the effort expended by my firm in handling this complex litigation.

8. The hourly rates shown in the report is appropriate considering the complex nature of this litigation. Many courts have approved my legal rates as reasonable and these rates are comparable to law firms in the area who handle similar complex litigation.

9. Exhibit 2 also extensively details the costs incurred by Pendley, Baudin & Coffin in prosecuting this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on the 9th day of April, 2013, at Plaquemine, Louisiana.

/s/ Patrick W. Pendley
PATRICK W. PENDLEY