

EXHIBIT 21

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLIONIS
EASTERN DIVISION**

IN RE:	NAVISTAR DIESEL ENGINE) PRODUCTS LIABILITY) LITIGATION)	Case No. 11 C 2496 MDL NO. 2223
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**DECLARATION OF BECNEL LAW FIRM, L.L.C. IN SUPPORT OF
PLAINTIFF’S MOTION FOR AN AWARD OF ATTONEYS’ FEES
AND REIMBURSEMENT OF EXPENSES**

I, Daniel E. Becnel, Jr., pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. This declaration is based upon my personal knowledge.
2. I am an attorney currently licensed in good standing to practice law in the states of Louisiana and Colorado. I am a principal of the Becnel Law Firm, L.L.C.
3. I have been actively engaged in the practice of law since 1969, primarily in the area of plaintiffs practice with substantial experience in complex litigation and class actions. I have served on numerous PSC’s and discovery committees. Please see Exhibit A for a CV of my experience.
4. I personally rendered legal services in this case, and was personally responsible for additional staffing and activity conducted on plaintiffs’ behalf by other attorneys and paraprofessionals at my firm, including overseeing all services rendered. Based on my activities and oversight in this case, as well as my review of my firm’s billing records maintained in this case, I have personal knowledge of the time attorneys and paraprofessionals at my firm spent

rendering services on behalf of the plaintiffs, the hourly rates charged for those services, and the necessary costs incurred in the normal course of this litigation.

5. Our office had 129 claimants from five states (Mississippi, Florida, Texas, South Carolina and Louisiana) with people who contacted our office whom we interviewed, received information on each vehicle, obtained Bill of Sales and/or Proof of Receipt. We spent a great deal of time vetting these clients, as well as advising them of the pros and cons of this class action, as well as the pros and cons of the global settlement which has been proposed. Individual time spent on these cases by Daniel E. Becnel, Jr., Matt Moreland, Kevin Klibert, Sal Christina, Toni Becnel and Will Percy, all of whom have ten or more years experience in class actions and are members of my firm totaled 525 hours. Attached hereto and made part hereof, marked Exhibit B, is my client database. This indeed was common benefit time since these clients were continually calling concerning their vehicles and discussing issues such as the sale of their vehicle, whether they should trade it in or not, whether it made sense to make the necessary repairs or simply buy a new engine.

6. In addition, Daniel E. Becnel, Jr. advised Parker, Waichman and Alonzo of this class action, as well as Richard Arsenault of Neblett, Beard and Arsenault of this class action since we have worked together for a number of years. They also became involved in this MDL. I also worked with Pat Pendley who had hundreds of cases from throughout the country since the PSC requested one client from each state from throughout the nation, with the exception of Mississippi since the state of Mississippi does not recognize class actions.

7. The attorneys and paraprofessionals at my firm expended the following number of hours, at the following hourly rates, in performing legal services on behalf of the plaintiffs in this case:

<u>Timekeeper</u>	<u>Position</u>	<u>Hours</u>	<u>Rate/Hour</u>	<u>Total</u>
Attorney	Partner	69.25	\$650	\$ 45,012.50
Attorney	Associate	790	\$550/650	\$508,475.00
Attorney	Partner/Associate	525	\$650	\$341,250.00
Total		1384.25		\$894,737.50

8. Based on my knowledge and experience, the rates charged by the attorneys and paraprofessionals at my firm are within the range of rates normally and customarily charged in the state[s] of Louisiana and Colorado by attorneys and paraprofessionals of similar qualifications and experience in cases of this kind.

9. In my judgment, and based on my years of experience, the number of hours expended and the services performed by the attorneys and paraprofessionals at my firm and under my supervision were reasonable and expended for the benefit of the plaintiffs in this litigation.

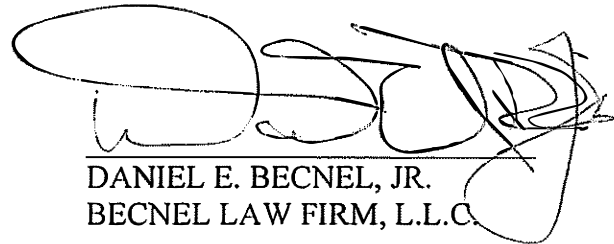
10. The total number of hours spent in rendering services through the date of this declaration, multiplied by his or her individual rate per hour, equals \$553,487.50.

11. My law firm also incurred expenses in the amount of \$73,923.61. These expenses include: filing fees, facsimile and copying charges, computer research, deposition and hearing transcripts costs, long distance telephone charges, federal express and other delivery charges, travel expenses, assessments and other case-related expenses that commonly benefitted plaintiffs. Based on my knowledge and experience, all of these expenses were necessary and reasonable, and incurred for the benefit of the plaintiffs in this litigation.

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

Dated:

April 8 2013



DANIEL E. BECNEL, JR.
BECNEL LAW FIRM, L.L.C.