

EXHIBIT 22

**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)	

DECLARATION OF ERIC D. HOLLAND

I, Eric D. Holland, declare as follows:

1. I am an attorney duly licensed to practice before the courts of Illinois, Michigan and Missouri, as well as a number of federal courts across the country. I am a partner at Holland Groves Schneller & Stolze, LLC, class counsel in the above-styled cause. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify in accordance with this declaration. I submit this declaration in support of Plaintiffs' Motion for an Award of Attorneys' Fees and Reimbursement of Expenses.

2. My firm resume setting forth the background and experience of my firm and my law partners, is attached hereto as Exhibit 1.

3. Holland Groves Schneller & Stolze, LLC has conducted analysis, investigation and drafting in this matter, as detailed in the Declaration of Lead Counsel.

4. By way of example, my firm performed extensive work in researching, drafting and filing a federal court complaint, as well as a state court complaint, interviewing numerous plaintiffs and compiling questionnaire responses. In particular, my firm performed extensive work researching particular aspects of certain state law claims and assisted Lead Counsel in connection with that project.

5. My firm and I took on a significant degree of risk in bringing and litigating this Action. To effectively prosecute this case, much like any complicated MDL matter, my firm had to commit a significant amount of time, personnel and expenses to this litigation on a contingency basis with absolutely no guarantee of being compensated in the end. The time and expenses we have expended are separately set forth in Exhibits 2 and 3.

6. Exhibits 2 and 3 setting forth the time and expenses expended are taken from time and expense printouts prepared and maintained by the firm in the ordinary course of business at or near the time of the entry of entries into firm records. I oversaw the day-to-day activities in the litigation and reviewed these printouts and backup documentation where necessary. The purpose of these reviews was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses that my firm committed to the litigation. I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation.

7. Based on this review, the total lodestar for Holland Groves Schneller & Stolze LLC is \$23,576.00 as set forth in Exhibit 2.

8. The work described herein was done to advance the litigation and has in fact done so. Furthermore, almost all of the work done was performed at the request of Lead Counsel to assist in the prosecution of this complex multi-district matter. The time and expenses expended by my firm in advancing this litigation is appropriate and reasonable, considering, among other factors: (i) the scope and nature of this large, nationwide MDL proceeding; and (ii) complexity and novelty of the claims asserted.

9. The hourly rates of my firm are appropriate for complex, nationwide litigation. My firm and I are recognized in the fields of consumer and class action litigation, as set forth more fully in the Firm Resume attached as an exhibit hereto.

10. Numerous courts have approved Holland Groves's rates as reasonable, some of which include the following cases approving similar fees:

Mark Parisot, et al v U.S. Title Guaranty Company, State of Missouri, City of St. Louis, Case No. 0822-CC09381

Vought, et al v Bank of America, et al, US District Court, Central District of Illinois, Case No. 2:10-cv-02052

Hayes, et al v Integrity Land Title Company, State of Missouri, County of St. Louis, 11SL-CC01429

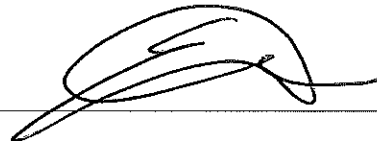
Christensen, et al v Volkswagen Group of America, US District Court, Northern District of Illinois, Case No. 1:10-cv-06484

11. My firm's customary rates are comparable to the prevailing hourly rates for law firms in St. Louis and Chicago where we extensively practice and in fact have been approved on multiple occasions by other federal courts in Illinois. Additionally, these rates are paid by individual private clients seeking hourly representation by the firm. Specifically, I declare that I have been hired on multiple recent occasions where my individual rate of \$750 was paid by the client by way of a significant retainer paid to the firm in advance of any work being performed. These matters arose from legal matters that occurred in Chicago and Detroit, respectively.

12. Plaintiffs' Counsel incurred a total of \$1,238.20 in expenses, a summary of which is set forth in Exhibit 3. These expenses consist of fees for Westlaw Research, service costs and filing fees. The Westlaw database was used in connection with legal research done at the request of Lead Counsel as set forth more fully above. All of the expenses contained in Exhibit 3 were entered in my firm's accounting records at or near the time of the incurring of said charges and are kept in the ordinary course of firm business.

13. My firm's expenses included in the Plaintiffs' fee and expense award request were necessary and reasonable, and they reflect market rates for the expenses incurred.

Further the declarant sayeth not. I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct. Executed this 10th day of April, 2013.

A handwritten signature in black ink, appearing to read "Eric D. Holland", is written over a horizontal line.

Eric D. Holland