

EXHIBIT 3

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

**In re: NAVISTAR DIESEL ENGINE)
PRODUCTS LIABILITY)
LITIGATION)**

**Case No. 11 C 2496
MDL NO. 2223**

This Document Relates to: All Cases

**DECLARATION OF GARY MASON IN SUPPORT OF PLAINTIFFS' MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

I, Gary Mason, declare as follows:

1. I am an attorney duly licensed to practice in the District of Columbia. I am a partner in the law firm of Whitfield Bryson & Mason, LLP. 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 office is located at 1625 Massachusetts Ave. NW Ste 605 Washington, DC 20036. I have practiced in the District of Columbia for 22 years, primarily in the field of class action and complex litigation.

3. I have worked with Cuneo Gilbert & LaDuca, LLP, and specifically with Charles J. LaDuca, on numerous class action cases over the course of the last ten years.

4. I have reviewed the rates set forth in Exhibit 2 to the Declaration of Charles J. LaDuca in Support of Plaintiffs' Motion for An Award of Attorneys' Fees and Reimbursement of Expenses. The rates set forth in Exhibit 2 are consistent with the prevailing rates charged by attorneys in the District of Columbia in litigation such as this. The rates set forth in Exhibit 2 are similar to the rates charged by the attorneys in my firm in class action and complex litigation.

5. My current Court-approved rate is \$680.

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 3rd day of April, 2013, at Washington, DC.



GARY MASON