

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

**In re Navistar MaxxForce Engines
Marketing, Sales Practices and
Products Liability Litigation**

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Case No. 1:14-cv-10318

Judge Joan B. Gottschall

DECLARATION OF LAUREL G. BELLOWS

I, Laurel G. Bellows, declare as follows:

1. This Declaration is submitted in support of The Bellows Law Group's request for fees in the captioned case.

2. I am an attorney in good standing duly admitted to practice in the States of Illinois, Florida and California and the sole Principal of the Bellows Law Group, P.C. ("BLG"). In March, 2015, Judge Joan B. Gottschall appointed me to serve as Liaison Counsel in the captioned matter. I have personal knowledge of the facts herein, and if called to do so, could and would testify competently thereto.

3. The work that I performed for the Class was primarily devoted to court appearances and motion practice. I reviewed and edited nearly every significant brief filed with the Court. I attended nearly all mediation sessions, and actively participated in the negotiation, mediation, settlement strategy and discovery. My Associate Lauren Murray was engaged in document review, in particular of thousands of documents produced by then-class-representative Wright Transportation. Ms. Murray was instrumental in preparing attorneys to defend Wright's deposition.

4. My current billing rate is \$750/hr, but the time submitted also includes my historical rate of \$725/hr. Ms. Murray's billing rate is \$250/hr, but the time submitted also includes her historical rate of \$76/hr.

5. These rates have been regularly billed to and paid by clients in the last several years, including litigation involving securities and other fraud, breach of fiduciary duty, shareholder disputes, breach of contract, Equal Pay Act and Title VII violations, wrongful discharge involving discrimination or significant public policy issues. These rates are also similar or lower than rates that have been approved by Courts in this District. *See, e.g., In re Sears, Roebuck & Co. Front-Loading Washer Prods. Liab. Litig.*, No. 06-7023, 2016 WL 4765679, at *13 (N.D. Ill. Sept. 13, 2016) (approving of \$800 hourly rate for attorney with 23 years of experience, and \$515 hourly rate for attorney with nine years of experience), *reversed and remanded on other grounds*, 867 F.3d 791 (7th Cir. 2017).

6. I have performed a line-by-line review of my time and that of Ms. Murray when they were billed and declare that the time submitted was reasonable and necessary for the prosecution of the case. The time submitted does not reflect all of the time that BLG incurred during this matter. Our work was at all times completely contingent on the outcome.

7. The time submitted for Bellows Law Group is set out in the following table:

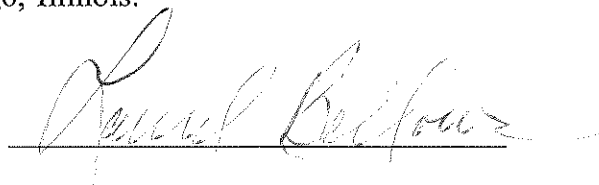
BELLOWS LAW GROUP TIME				
NAME	TITLE	HOURS	RATE(S)	TOTAL
Bellows, Laurel	Partner	87.4	\$725 - \$750	\$64,600.00
Murray, Lauren Tuckey	Associate	51.7	\$75 - \$250	\$6,870.00
TOTAL		139.1		\$71,470.00

8. A true and correct copy of my resume is attached as Exhibit A.

9. I believe that the requested fees are fair and reasonable in the context of the result obtained for the Class.

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

Executed on this 3rd day of September, 2019, in Chicago, Illinois.

A handwritten signature in cursive script, appearing to read "Laurel Bellows", is written over a horizontal line.

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