

EXHIBIT B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

<p>PRECISION ASSOCIATES, INC., <i>et al.</i>,</p> <p>Plaintiffs,</p> <p>v.</p> <p>PANALPINA WORLD TRANSPORT (HOLDING) LTD., <i>et al.</i></p> <p>Defendants.</p>	<p>CASE NO. 08-CV-00042 (JG)(VVP)</p>
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**DECLARATION OF STEVEN N. WILLIAMS IN SUPPORT OF
PLAINTIFFS' PETITION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES FILED ON BEHALF OF
COTCHETT, PITRE & McCARTHY, LLP**

I, Steven N. Williams, declare and state as follows:

1. I am a partner at the law firm of Cotchett, Pitre & McCarthy, LLP. I submit this Declaration in support of Plaintiffs' petition for an interim award of attorneys' fees and reimbursement of costs and expenses in connection with services rendered and expenses incurred by my firm in connection with this litigation.

2. My firm is this Court's appointed co-lead counsel to Plaintiffs and the Plaintiff class in this class action. During the period August 16, 2015 through July 31, 2016, my firm has been involved in the following activities on behalf of the Plaintiffs:

- Extensive settlement negotiations and settlement resolution with the DHL and Hellman defendants;
- Multiple meetings and teleconference calls with counsel and mediator Kenneth Feinberg regarding protracted settlement discussions with DHL;
- Court appearances and preparation for Court appearances;

- Discovery, including strategy and resolution pertaining to the Hellman defendants, supplemental discovery responses, summarizing depositions, and review and analysis of Hellman and DHL defendant documents;
- Claims Administration, including correspondence and communications with class members, CAFA issues, responding to opt-out issues, and communications with class notice providers; and
- Drafting pleadings and conducting research pertaining to the previous motion for final approval and hearing.

3. The schedule attached hereto as Exhibit 1 is a detailed summary indicating the amount of time spent by the partners, attorneys and other professional support staff of my firm who have been involved in this litigation, and the lodestar calculation is based on my firm's current hourly billing rates except for work done on document review which is capped at \$400 per hour from August 16, 2015 through July 31, 2016.

4. The total number of hours expended on this litigation by my firm from August 16, 2015 through July 31, 2016, is 683.40 hours. The total lodestar for my firm is \$339,320.00. My firm's lodestar figures are based on the firm's current hourly billing rates. The hourly rates for the partners, attorneys and professional support staff in my firm are the same as the usual and customary hourly rates charged for their services in contingent billable matters. The total hours was determined by the examination of contemporaneous, daily time records regularly prepared and maintained by my firm and which have been provided to co-lead counsel for their review.

5. As detailed in Exhibit 2, my firm has incurred a total of \$21,281.39 in unreimbursed expenses during the period August 16, 2015 through July 31, 2016.

6. The expenses incurred in this action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and represent an accurate recordation of the expenses incurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 1st day of September 2016 at Burlingame, California.

/s/ Steven N. Williams

STEVEN N. WILLIAMS

EXHIBIT 1

Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) Ltd., et al.
[Freight Forwarders Antitrust Litigation]
Exhibit 1 TIME REPORT SUMMARY

Firm Name: Cotchett, Pitre & McCarthy, LLP

Reporting Period: August 16, 2015 through July 31, 2016 (does not include data submitted in the previously filed interim fee petitions)

- | | | | |
|--|---|----------------|----------------|
| (1) Investigations & Factual Research | (5) Settlement | Partner (P) | Associate (A) |
| (2) Discovery | (6) Class Certification | Paralegal (PL) | Law Clerk (LC) |
| (3) Pleadings, Briefs (drafting, serving, filing & legal research) | (7) Trial & Preparation | | |
| (4) Court Appearances & Preparation | (8) Litigation Strategy, Analysis & Case Management | | |

Name & Status	1	2	3	4	5	6	7	8	Current Hourly Rate	Total Hours This Period	Lodestar This Period
Cotchett, Joseph W. (P)	1.50								\$950	1.50	\$1,425.00
Williams, Steven N. (P)		6.10	9.60	16.30	65.00				\$850	97.00	\$82,450.00
Zapala, Adam J. (P)		3.90	40.10	21.40	55.60				\$750	121.00	\$90,750.00
Zapala, Adam J. (P)		3.30							\$400	3.30	\$1,320.00
Carter, Junia (A)		122.00							\$400	122.00	\$48,800.00
Rao, Divya B. (A)		18.30							\$400	18.30	\$7,320.00
Ross, Trevor (A)		99.20							\$400	99.20	\$39,680.00
Shannon, Gerard (A)		65.70							\$400	65.70	\$26,280.00
Concepcion, Latoya (PL)					1.60			0.40	\$325	2.00	\$650.00
Verducci, Jaclyn (PL)			28.00		2.20			0.40	\$325	30.60	\$9,945.00
Bott, Evan (PL)		84.20	3.00		22.60			3.00	\$250	112.80	\$28,200.00
Caylao, Michael (PL)			10.00						\$250	10.00	\$2,500.00
										0.00	\$0.00
TOTALS	1.50	402.70	90.70	37.70	147.00	0.00	0.00	3.80		683.40	\$339,320.00

EXHIBIT 2

Precision Associates, Inc., et al., v. Panalpina World Transport (Holding) Ltd., et al.**Eastern District of New York Case No. 1:08-cv-00042-JG-VVP****Exhibit 2 - Summary of Expenses****Firm Name: Cotchett, Pitre & McCarthy, LLP****Time Period: August 16, 2015 through July 31, 2016****(does not include expenses submitted in
the previously filed interim fee petitions)**

Type of Expense	Cumulative Total
Assessments to Common Cost Litigation Fund	\$12,000.00
Commercial Copies	
Internal Reproduction / Copies	\$273.00
Court Costs & Filing Fees	
Court Reporters & Transcripts	\$16.08
Computer Research	\$593.24
Telephone & Fax	\$85.69
Postage / Express Delivery / Messenger	\$98.52
Professional Fees (expert, investigator, accountant, etc.)(describe)	
Witness / Service Fees	
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$8,214.86
Clerical Overtime	
Miscellaneous (Describe)	
TOTAL EXPENSES	\$21,281.39