

EXHIBIT C

**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> |
|--|---------------------------------------|

**DECLARATION OF DANIEL C. HEDLUND IN SUPPORT OF
PLAINTIFFS' PETITION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES FILED ON BEHALF OF
GUSTAFSON GLUEK PLLC**

I, Daniel C. Hedlund, declare and state as follows:

1. I am a Member of the law firm of Gustafson Gluek PLLC. 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 of August 16, 2015, through July 31, 2016, my firm has been involved in the following activities, among others, on behalf of Plaintiffs:

- Reviewing, analyzing and coding documents produced by Defendants.
- Managing and supervising a team of document reviewers, including in-person review of DHL employee expense reports.
- Analyzing and summarizing deposition transcripts.
- Consulting with experts regarding Defendants' transactional data and other issues.
- Drafting the Fourth Amended Complaint.
- Drafting responses to Defendant interrogatory requests and requests for production of documents, including privilege logs.

- Meeting and conferring with Defendants regarding discovery responses, including privileged and redacted document issues.
- Preparing and analyzing narrative of evidence.
- Engaging with experts regarding damages and impact calculations.
- Drafting and arguing motions to compel, motions for protective orders and motions to quash subpoenas.
- Attending status conferences in front of Judge Cogan and Judge Pohorelsky.
- Conferring with Co-Lead Counsel and Plaintiffs' Counsel regarding case strategy.
- Drafting the motion for final approval of eleven settlements with defendants SDV, Panalpina, Geodis, DSV, Jet Speed, Toll, Agility, UPS, Dachser, the Japanese Defendants, and the DHL Defendants with respect to the Japanese claims only.
- Negotiating the DHL and Hellmann settlements, including participating in multiple mediation sessions.
- Drafting, negotiating and finalizing the DHL and Hellmann settlement agreements.
- Drafting motions regarding preliminary approval of the DHL and Hellmann settlements.
- Responding to questions raised by class members regarding the settlements.
- Creation, implementation, and supervision of a claims administration process, and communicating with class members about their claims.
- Coordinating, drafting and finalizing class notice and claims stimulation process.
- Coordinating, drafting and finalizing the Court's approved plan of allocation and related projects.

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 1,283.50 hours. The total lodestar for my firm is \$678,598.75. 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 were 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 \$27,488.66 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 24th day of August, 2016 at Minneapolis, Minnesota.

/s/Daniel C. Hedlund

Daniel C. Hedlund

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: Gustafson Gluek PLLC

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 | Contract Attorney (CA) | |
| (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 |
|-------------------------|-------------|---------------|--------------|--------------|---------------|-------------|-------------|---------------|---------------------|-------------------------|----------------------|
| Daniel E. Gustafson (P) | | 2.25 | | 15.25 | 45.50 | | | 21.75 | \$975 | 84.75 | \$82,631.25 |
| Daniel C. Hedlund (P) | | 41.25 | 6.50 | 18.50 | 85.00 | | | 32.75 | \$800 | 184.00 | \$147,200.00 |
| Michelle J. Looby (P) | | 94.75 | 50.25 | 6.50 | 185.50 | | | 142.00 | \$500 | 479.00 | \$239,500.00 |
| Joshua J. Rissman (A) | | 121.50 | 2.00 | 15.25 | 119.25 | | | 13.00 | \$425 | 271.00 | \$115,175.00 |
| Joseph C. Bourne (A) | | 27.50 | 0.25 | | | | | 1.50 | \$435 | 29.25 | \$12,723.75 |
| Daniel J. Nordin (A) | | 0.75 | | | | | | 2.50 | \$400 | 3.25 | \$1,300.00 |
| Raina C. Borrelli (A) | | 2.75 | | | | | | | \$400 | 2.75 | \$1,100.00 |
| Johanna Smith (A) | | 2.00 | | | | | | | \$325 | 2.00 | \$650.00 |
| Melanie L. Morgan (PL) | | | | 1.00 | | | | 5.25 | \$175 | 6.25 | \$1,093.75 |
| Sarah A. Moen (PL) | | | 0.50 | | | | | | \$225 | 0.50 | \$112.50 |
| Eric S. Taubel (A) | | 9.25 | | | | | | | \$400 | 9.25 | \$3,700.00 |
| Jamie L. Holzer (PL) | | 26.75 | 8.50 | 4.00 | 6.50 | | | 9.25 | \$200 | 55.00 | \$11,000.00 |
| Chelsea M. Noble (PL) | | | | | | | | 0.75 | \$150 | 0.75 | \$112.50 |
| Kyle MacDonald (CA) | | 121.00 | | | | | | | \$400 | 121.00 | \$48,400.00 |
| Michael Winston (CA) | | 34.75 | | | | | | | \$400 | 34.75 | \$13,900.00 |
| TOTALS | 0.00 | 484.50 | 68.00 | 60.50 | 441.75 | 0.00 | 0.00 | 228.75 | | 1,283.50 | \$678,598.75 |

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: Gustafson Gluek PLLC

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 | \$1,344.04 |
| Internal Reproduction / Copies | \$818.40 |
| Court Costs & Filing Fees | |
| Court Reporters & Transcripts | |
| Computer Research | \$685.16 |
| Telephone & Fax | \$136.72 |
| Postage / Express Delivery / Messenger | \$291.16 |
| Professional Fees (expert, investigator, accountant, etc.)(describe) | |
| Witness / Service Fees | |
| Travel: Air Transportation, Ground Travel, Meals, Lodging, etc. | \$12,213.18 |
| Clerical Overtime | |
| Miscellaneous (Describe) | |
| | |
| | |
| TOTAL EXPENSES | \$27,488.66 |