

EXHIBIT D

**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 BENJAMIN M. JACCARINO IN SUPPORT OF
PLAINTIFFS' PETITION FOR ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES FILED ON BEHALF OF
LOVELL STEWART HALEBIAN JACOBSON LLP**

I, Benjamin M. Jaccarino, declare and state as follows:

1. I am a partner of the law firm of Lovell Stewart Halebian Jacobson 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:

- Legal research.
- Discovery work (RFA's and Interrogatories) relating to Defendants.
- Prepared for oral argument relating to motions to compel.
- Reviewed Defendant transactional records including invoices and documents.
- Drafting brief relating to motion for a protective order.
- Reviewed files and prepared for depositions (including Messrs. Krusin and Haeussler).
- Settlement negotiations with numerous Defendants.

- Responded to numerous potential class member questions relating to the case, the settlements, and the claims process.

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 792.72 hours. The total lodestar for my firm is \$399,285.50. 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 \$37,499.37 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 31st day of August 2016 at New York, NY.

/s/ Benjamin M. Jaccarino
Benjamin M. Jaccarino

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: Lovell Stewart Halebian Jacobson 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
Christopher Lovell (P)		10.00	11.40		20.00			3.15	\$990	44.55	\$44,104.50
Gary Jacobson (P)		33.40	69.00	28.50	27.70				\$940	158.60	\$149,084.00
Ian Stoll (P)		23.25							\$780	23.25	\$18,135.00
Christopher McGrath (P)					1.60				\$670	1.60	\$1,072.00
Merrick Rayle (P)					0.90				\$730	0.90	\$657.00
Benjamin Jaccarino (P)		18.00	6.50		1.00			1.00	\$460	26.50	\$12,190.00
Matt Kuipers		174.80							\$375	174.80	\$65,550.00
Jacob Ferris		117.50							\$320	117.50	\$37,600.00
James Payne		141.00							\$275	141.00	\$38,775.00
Katie O'Neill		67.00							\$375	67.00	\$25,125.00
Martha Geaneas (PL)								5.02	\$150	5.02	\$753.00
Keith Andrews (PL)		32.00							\$195	32.00	\$6,240.00
TOTALS	0.00	616.95	86.90	28.50	51.20	0.00	0.00	9.17		792.72	\$399,285.50

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:

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	
Commercial Copies	\$254.11
Internal Reproduction / Copies	
Court Costs & Filing Fees	
Court Reporters & Transcripts	
Computer Research	\$903.56
Telephone & Fax	
Postage / Express Delivery / Messenger	\$97.86
Professional Fees (expert, investigator, accountant, etc.)(describe)	\$22,000.00
Witness / Service Fees	\$713.50
Travel: Air Transportation, Ground Travel, Meals, Lodging, etc.	\$13,357.21
Clerical Overtime	
Miscellaneous (Document destruction)	\$173.13
TOTAL EXPENSES	\$37,499.37