

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

PRECISION ASSOCIATES, INC., et al., on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT  
(HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (BMC) (PK)

**DECLARATION OF TAKANORI AIDA IN SUPPORT OF CLASS COUNSEL'S  
MOTION FOR APPROVAL OF SERVICE AWARDS TO CLASS REPRESENTATIVES**

I, Takanori Aida, being duly sworn, hereby declare as follows:

1. My name is Takanori Aida, and I reside in New York, New York. I am the primary contact for Innovation 714 Inc. ("Innovation"), a Class Representative in this matter, represented by Class Counsel.

2. I am submitting this Declaration in support of Class Counsel's Motion for Approval of Service Awards to Class Representatives. This declaration is based upon my personal knowledge and experience. If need be, I can competently testify to the facts set forth in this Declaration.

3. Innovation was founded in 2006 and continues to operate to this day. Innovation's primary business is consumer good and dry goods to and from the United States to Japan, as well as shipping other goods to and from various locations Europe to Japan. In order to best serve its customers Innovation regularly purchased shipping services, an essential part of the business

operations. As a small business, I strongly believe that the prices paid for inputs and services must be as competitive as possible.

4. My company and I first became involved in this case on or around November 2012, through our legal counsel, Lovell Stewart Halebian Jacobson LLP. We and other plaintiffs alleged a conspiracy among freight forwarding companies to fix, maintain and stabilize the price of Freight Forwarding Services, including several specific surcharges.

5. As part of my duties as a Class Representative I consulted with my attorneys and stayed abreast of the status of the litigation. These efforts included periodic calls, monthly e-mails exchanges, and meetings with my counsel along with my review of numerous filings with the Court and other papers.

6. In addition, I responded to Defendants' discovery requests by, among other things, discussing those requests with my counsel, searching through business records multiple times to locate documents responsive to Defendant's document requests. As a result of these efforts, we ultimately produced multiple excel files with summaries of agent routing information of hundreds of pages of documents in this litigation. Further, I answered multiple interrogatories which were sent to me by the Defendants. I estimate that these document production efforts and responses to the Defendant's interrogatories took me and members of my company at least 30 hours.

7. While I understand that many potential class members chose to remain unidentified and benefit off the efforts and risks taken by identified class members, I felt strongly that the Class should have appropriate representation and that I should play a role in the litigation.

8. Prior to agreeing to proceed with this lawsuit, I considered the very real potential that a defendant in the action might retaliate against me, or my business, explicitly or implicitly. As an ongoing small business which operates on with narrow margins and various time restraints (ie, providing our clients with timely and reliable shipping services) any slowdown or disruption in freight forwarding would have a devastating effect on the business.

9. To date I estimate that I have spent 60 hours of my time in my role as Class Representative.

10. At no time did Class Counsel or anyone ever promise me or my company any type of financial compensation for my work as a named class representative, or otherwise, beyond what I would receive as my share as a Class Member of any settlement or judgment achieved.

11. I have always understood whether I received a service award, and its amount, would be determined by the Court in its discretion. No one promised me a service award of any amount.

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

Dated: Aug 23, 2016

Respectfully submitted,

/s/ 