

**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 LARRY GLAZER IN SUPPORT OF CLASS COUNSEL'S  
MOTION FOR APPROVAL OF SERVICE AWARDS TO CLASS REPRESENTATIVES**

I, Larry Glazer, being duly sworn, hereby declare as follows:

1. I am the primary contact for Inter-Global, Inc. 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. If asked to testify, I could competently testify to the facts set forth in this Declaration.
3. This declaration is based upon my personal knowledge and/or experience.
4. 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 my company would receive as its share as a Class Member of any settlement or judgment achieved.

5. Inter-Global has always understood that whether it received a service award, and its amount, would be decided by the Court in its discretion. No one promised Inter-Global or me a service award of any amount.

6. I reside in St. Louis County, Missouri where I am employed by Inter-Global, a business that engages in, among other things, manufacturing and importing lighting components.

7. Inter-Global and I first became involved in this case on or around September, 2012 when Inter-Global filed a class action lawsuit against freight forwarders alleging a conspiracy to fix, maintain and stabilize the price of Freight Forwarding Services, including various surcharges.

8. As part of Inter-Global's duties as a Class Representative I and other employees consulted with our attorneys and stayed abreast of the status of the litigation.

9. These efforts included calls, e-mails and meetings with my counsel along with my review of numerous filings with the Court and other papers. The obligation to respond to our lawyer's questions and to assemble information and documents fell upon persons in the company who had diverse responsibilities and who were usually very busy dealing with their daily assignments. Therefore, the time spent obtaining information for this case often pulled our employees away from regular work responsibilities and they therefore had to juggle these tasks as best they could to meet our responsibilities as a class representative and to our regular clients who operated in a time sensitive environment.

10. In addition, Inter-Global and I responded to Defendants' discovery requests by, among other things, discussing those requests with our counsel, searching through business records multiple times to locate documents responsive to Defendant's document requests. In total, we responded to 166 document requests. As a result of these efforts, we ultimately

produced 98 pages of documents in this litigation. I estimate that these document production efforts took me and members of my company about/at least 5 hours.

11. In addition to Defendants' document requests, Inter-Global responded to interrogatories, which were served in multiple sets by different Defendants. I estimate that these efforts in responding to interrogatories took me and members of my company about 2 hours.

12. To date I estimate that Inter-Global has spent 12 hours of time performing various duties as Class Representative.

13. In light of our efforts which benefitted the Class, Inter-Global respectfully suggest that an additional Incentive Award would be fair.

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

Dated: August 22, 2016

Respectfully submitted,

  
/s/ \_\_\_\_\_  
Larry Glazer