

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION (DAYTON)**

ART SHY, et al.

Plaintiffs,

vs.

NAVISTAR INTERNATIONAL  
CORPORATION, et al.

Defendants.

Case No. 3:92-CV-00333

District Judge Walter H. Rice

**DECLARATION OF CARL POTTS IN SUPPORT OF FINAL APPROVAL OF CLASS  
ACTION SETTLEMENT**

I, Carl Potts, declare as follows:

1. The statements in this declaration are based on my personal knowledge and experience. I am a class representative in this matter.

2. After this Court granted preliminary approval of the proposed settlement in this matter, I spoke with one of my friends from Ohio, a Navistar retiree, about the settlement and the benefits it will provide to us class members. I worked with him in management when I was at Navistar. He was very pleased to hear about the settlement and the benefits it provides to us.

3. I believe that I have the best insurance in the world under the Shy Agreement, its addendum, and this settlement.

4. I continued to strongly support the settlement currently pending before this Court. I believe that it is fair and reasonable and very much look forward to receiving benefits from it during my lifetime.

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

Completed and approved this 24th day of March, 2022 in Chattanooga, Tennessee.

/s/ Carl W. Potts  
Carl W. Potts