

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**DECLARATION OF JASON C. DAVIS IN SUPPORT OF LEAD PLAINTIFFS’
OPPOSITION TO DEFENDANTS’ MOTION FOR A FINDING OF CONTEMPT AND
FOR APPROPRIATE SANCTIONS**

REDACTED VERSION

I, JASON C. DAVIS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am associated with the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiff in the above-entitled action. I am admitted to appear before this Court *pro hac vice*. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

Exhibit A: Transcript excerpts from the Videotaped Deposition of Kenneth H. Robin, taken December 7, 2006 (**filed under seal**);

Exhibit B: Transcript excerpts from the Videotaped Deposition of Robin Allcock, Volume II of II, taken March 8, 2007;

Exhibit C: Transcript excerpts from the Videotaped Deposition of Catherine A. Ghiglieri, taken February 13, 2008;

Exhibit D: Appendix C to the Expert Witness Report of Catherine A. Ghiglieri;

Exhibit E: Appendix 4 to the Report of Robert E. Litan; and

Exhibit F: Excerpts from the Thirteenth Privilege Log of the Household Defendants, October 25, 2006.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 25th day of March, 2008, at San Francisco, California.

/s/ Jason C. Davis

JASON C. DAVIS

DECLARATION OF SERVICE BY ELECTRONIC MAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on March 25, 2008, declarant served by electronic mail and by U.S. Mail to the parties the: **DECLARATION OF JASON C. DAVIS IN SUPPORT OF LEAD PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION FOR A FINDING OF CONTEMPT AND FOR APPROPRIATE SANCTIONS (REDACTED VERSION)**. The parties' email addresses are as follows:

TKavaler@cahill.com PSloane@cahill.com PFarren@cahill.com LBest@cahill.com DOwen@cahill.com	NEimer@EimerStahl.com ADeutsch@EimerStahl.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.
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110 East 59th Street, 25th Floor
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David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of March, 2008, at San Francisco, California.

/s/ Marcy Medeiros

MARCY MEDEIROS