

**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 MICHAEL J. DOWD IN SUPPORT OF OPPOSITION TO
DEFENDANTS' CROSS-MOTION PURSUANT TO FED. R. CIV. P. 37(c) TO
EXCLUDE DECLARATIONS OF BRANCH SALES MANAGERS**

I, MICHAEL J. DOWD, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the States of California and New York, and the District Court for the Northern District of Illinois. I am a member of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiffs in the above-entitled action. 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: Letter of June 8, 2006 from Ira Dembrow, Esq. to Luke Brooks, Esq.; and

Exhibit B: *Forbes*, "Home Wrecker," by Bernard Condon, dated September 2, 2002.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 28th day of January, 2009, at San Diego, California.

/s/ Michael J. Dowd

MICHAEL J. DOWD

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 Diego, State of California, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 655 West Broadway Suite 1900, San Diego, California 92101.

2. That on January 28, 2009, declarant served by electronic mail and by U.S. Mail to the parties the **DECLARATION OF MICHAEL J. DOWD IN SUPPORT OF OPPOSITION TO DEFENDANTS' CROSS-MOTION PURSUANT TO FED. R. CIV. P. 37(C) TO EXCLUDE DECLARATIONS OF BRANCH SALES MANAGERS.**

The parties' email addresses are as follows:

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and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
110 East 59th Street, 25th Floor
New York, NY 10022

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 28th day of January, 2009, at San Diego, California.

/s/ Teresa Holindrake

TERESA HOLINDRAKE