

**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,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	Judge Ronald A. Guzman
)	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
Defendants.)	
_____)	

**DECLARATION OF MICHAEL J. DOWD IN SUPPORT OF PLAINTIFFS'
MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR
JUDGMENT AS A MATTER OF LAW PURSUANT TO RULE 50(a)**

I, MICHAEL J. DOWD, declare as follows:

1. I am a member of the bar of the State of California and a member of the firm of Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel for plaintiffs in this action. I am admitted *pro hac vice* in this Court for this action. I submit this declaration in support of Plaintiffs' Memorandum of Law in Opposition to Defendants' Motion for Judgment as a Matter of Law Pursuant to Rule 50(a). I make this declaration based upon information and belief and my review of relevant documents.

2. I have attached hereto as Exhibit A a true and correct copy of the transcript of those portions of the deposition of Charles Cross designated by plaintiffs and presented at trial on April 9, 2009.

3. I have attached hereto as Exhibit B a true and correct copy of the transcript of those portions of the deposition of Dennis Hueman designated by plaintiffs and presented at trial on April 9, 2009.

4. I have attached hereto as Exhibit C a true and correct copy of the transcript of those portions of the deposition of Todd May designated by plaintiffs and presented at trial on April 20, 2009.

5. I have attached hereto as Exhibit D a true and correct copy of the transcript of those portions of the deposition of Kenneth Walker designated by plaintiffs and presented at trial on April 9, 2009.

6. I have attached hereto as Exhibit E a true and correct copy of the transcript of those portions of the deposition of Lewellyn Walter designated by plaintiffs and presented at trial on April 9, 2009.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of April, 2009 at Chicago, Illinois.

/s/ MICHAEL J. DOWD

MICHAEL J. DOWD

S:\CasesSD\Household Intl\Trial\DEC00059174.doc

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 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on April 27, 2009, declarant served by electronic mail and by U.S. Mail to the parties the DECLARATION OF MICHAEL J. DOWD IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION FOR JUDGMENT AS A MATTER OF LAW PURSUANT TO RULE 50(a).

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
--	--

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 27th day of April, 2009, at Chicago, Illinois.

/s/ Rika J. Ellis

RIKA J. ELLIS