

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

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,)	
)	
Plaintiff,)	
- <i>against</i> -)	
)	
HOUSEHOLD INTERNATIONAL, INC., ET. AL.,)	
)	
Defendants.)	

Lead Case No. 02-C-5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzmán

**SUPPLEMENTAL DECLARATION OF THOMAS J. KAVALER IN
SUPPORT OF DEFENDANTS' MOTIONS FOR JUDGMENT AS A
MATTER OF LAW PURSUANT TO RULE 50(b) OR, IN THE
ALTERNATIVE, FOR A NEW TRIAL PURSUANT TO RULE 59**

I, THOMAS J. KAVALER, declare as follows:

1. I am a member of the bar and the trial bar of this Court and a member of the firm of Cahill Gordon & Reindel LLP, attorneys for Household International, Inc., William F. Aldinger, David A. Schoenholz and Gary Gilmer, Defendants in this action. I submit this declaration to place before the Court certain information and documents referenced in the accompanying Reply Memorandum of Law in Support of Defendants' Motions for Judgment as a Matter of Law Pursuant to Rule 50(b) or, in the alternative, for a new trial pursuant to Rule 59 ("Defendants' Memorandum").

2. Attached hereto as Exhibit 1 is a true and correct copy the draft verdict form submitted by Plaintiffs to the Court on April 26, 2009 pursuant to the Court's instructions on April 24, 2009.

3. Attached hereto as Exhibit 2 is a true and correct copy of an excerpt of the transcript of the hearing before the Honorable Ronald A. Guzmán, District Judge, dated December 16, 2008.

4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Joint Report of John L. Bley and Carl A. LaSusa, which was served upon Plaintiffs in this action on February 15, 2008.

5. I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct.

Executed this 18th day of September, 2009, in New York, New York.

/s/ Thomas J. Kavalier

Thomas J. Kavalier