

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

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|---|--------------------------|
| 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.) | |
| |) |
| HOUSEHOLD INTERNATIONAL, INC., et) | |
| al.,) | |
| |) |
| Defendants.) | |
| _____) | |

**DECLARATION OF JAMES GLICKENHAUS IN SUPPORT OF MOTION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES AND REIMBURSEMENT TO THE
CLASS REPRESENTATIVES PURSUANT TO 15 U.S.C. §78U-4(a)(4)**

I, JAMES GLICKENHAUS, declare as follows:

1. I respectfully submit this Declaration in support of approval of Robbins Geller Rudman & Dowd LLP's ("Lead Counsel" or "Robbins Geller") application for an award of attorneys' fees and reimbursement of expenses and Glickenhau & Co.'s ("Glickenhau") application for an award of expenses pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), 15 U.S.C. §78u-4(a)(4).

2. During the Class Period in this case and during the litigation, I was the General Partner of Glickenhau & Co. As a money manager, Glickenhau's investment portfolio includes shareholder positions in numerous publicly-traded companies. Although Glickenhau has suffered investment losses on the stock of a number of publicly-traded companies since the enactment of the PSLRA, we are selective in choosing the cases in which to participate as a lead plaintiff and/or class representative and chose to participate in a representative capacity in the above-captioned action only after determining that this case merited institutional representation and participation.

3. It is my understanding that the Court previously appointed Glickenhau as a Lead Plaintiff and Class Representative in this Litigation. In fulfillment of its responsibilities as a Lead Plaintiff and Class Representative, Glickenhau & Co. performed its duties in pursuit of a favorable result in this case. To that end, Glickenhau:

- (a) Selected Robbins Geller as Class Counsel;
- (b) Engaged in conferences with the other Lead plaintiffs, IUOE and PACE, and counsel from Robbins Geller;
- (c) Participated in the Litigation and provided input into the prosecution of the action;
- (d) Kept informed regarding case developments and procedural status;
- (e) Reviewed pleadings and motions filed in the case;

(f) Complied with class certification and potential discovery requests, including providing relevant documents and information, preparing for deposition, and giving my deposition testimony; and

(g) Monitored and participated in any settlement discussions.

4. As Chairman of Glickenhau, I represent that Glickenhau has approved Lead Counsel's request to seek attorneys' fees of 24.37% of the Judgment Amount. Lead Counsel took on significant risks on behalf of the Class and fronted millions of dollars in expenses and worked thousands of hours for over a decade on this case. I believe that Lead Counsel should be awarded 24.37% of the Judgment.

5. I understand that the PSLRA, while generally prohibiting a class representative being awarded a recovery in percentage terms greater than any other class member, provides for the reimbursement of costs and expenses incurred or otherwise absorbed by a shareholder in connection with its services in a securities class action. In connection with the services performed by Glickenhau in the best interests of the Class, Glickenhau incurred expenses associated with my time expended in the action and various Glickenhau personnel who assisted in responding to written discovery and the production of relevant hard-copy and electronic documents. The total of these unreimbursed expenses is \$27,065. The costs and expenses are further broken down in Exhibit A, attached to this declaration. These unreimbursed expenses were reasonably and necessarily incurred in connection with Glickenhau's services to all Class members in the case and are believed to be fair and reasonable.

6. On behalf of Glickenhau, I appreciate the Court's consideration of the foregoing facts and respectfully request that the Court grant Lead Counsel's application for an award of attorneys' fees and expenses, and Glickenhau's request for reimbursement pursuant to the PSLRA.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 11th day of December, 2013, at Sleepy Hollow, New York.



JAMES GLICKENHAUS
ON BEHALF OF GLICKENHAUS & CO.

DECLARATION OF SERVICE BY ELECTRONIC 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 December 31, 2013, declarant caused to be served by electronic mail to the parties the following document:

DECLARATION OF JAMES GLICKENHAUS IN SUPPORT OF MOTION FOR
AWARD OF ATTORNEYS' FEES AND EXPENSES AND REIMBURSEMENT TO THE
CLASS REPRESENTATIVES PURSUANT TO 15 U.S.C. §78u-4(a)(4)

The parties' e-mail addresses are as follows:

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|---------------------------|---------------------------|
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I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of December, 2013, at San Diego, California.

s/ TERESA HOLINDRAKE
TERESA HOLINDRAKE