

**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.)	
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**DECLARATION OF MARIA WIECK IN SUPPORT OF MOTION FOR
REIMBURSEMENT TO THE CLASS REPRESENTATIVES PURSUANT TO 15 U.S.C.
§78U-4(A)(4)**

I, MARIA WIECK, declare as follows:

1. I respectfully submit this Declaration in support of PACE Industry Union-Management Pension Fund's ("PACE") 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. I am the Administrative Officer for PACE and responsible for administering the daily operations of the Fund and report to the Board of Trustees. As an institutional investor, PACE's investment portfolio includes shareholder positions in numerous publicly-traded companies. Although PACE 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 PACE as a Lead Plaintiff and Class Representative in this Litigation. In fulfillment of its responsibilities as a Class Representative, PACE performed its duties in pursuit of a favorable result in this case. To that end, PACE:

- (a) Selected Robbins Geller as Class Counsel;
- (b) Engaged in conferences with the other Lead plaintiffs, IUOE and Glickenhau & Co., and counsel from Robbins Geller and our counsel (Motley Rice LLC);
- (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 gave my deposition testimony;

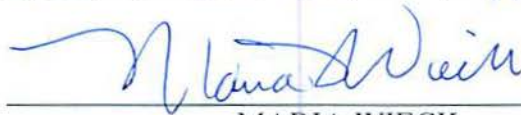
(g) Monitored and participated in any settlement discussions; and

(h) I personally attended the first day of trial of this action.

4. 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 PACE in the best interests of the Class, PACE incurred expenses associated with this action in the amount of \$15,287.07. *See* Exhibit A attached. These unreimbursed expenses were reasonably and necessarily incurred in connection with PACE's services to all Class members in the case and are believed to be fair and reasonable.

5. On behalf of PACE, I appreciate the Court's consideration of the foregoing facts and respectfully request that the Court grant PACE'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 18 day of December, 2013, at Nashville, TN



MARIA WIECK
ON BEHALF OF PACE INDUSTRY UNION
MANAGEMENT PENSION FUND

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 MARIA WIECK IN SUPPORT OF MOTION FOR
REIMBURSEMENT TO THE CLASS REPRESENTATIVES PURSUANT TO 15 U.S.C.
§78U-4(a)(4)

The parties' e-mail addresses are as follows:

Tkavaler@cahill.com	Zhudson@bancroftpllc.com
Pfaren@cahill.com	Mrakoczy@skadden.com
Dowen@cahill.com	Rstoll@skadden.com
Jhall@cahill.com	Mmiller@MillerLawLLC.com
Pclement@bancroftpllc.com	Lfanning@MillerLawLLC.com

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