

**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

CERTIFICATE OF SERVICE

I hereby certify that on August 29, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for counsel of record denoted on the attached Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 29, 2016.

s/ Spencer A. Burkholz

SPENCER A. BURKHOLZ

ROBBINS GELLER RUDMAN
& DOWD LLP

655 West Broadway, Suite 1900

San Diego, CA 92101-8498

Telephone: 619/231-1058

619/231-7423 (fax)

E-mail: SpenceB@rgrdlaw.com

Jaffe v. Household Int'l, Inc., No. 02-5893 (N.D. Ill.)
 Service List

Counsel	E-mail address
Stewart Theodore Kuser Giovanni Antonio Raimondi THE KUSPER LAW GROUP, LTD. 20 North Clark Street, Suite 3000 Chicago, IL 60602 (312) 204-7938 Tim S. Leonard JACKSON WALKER L.L.P. 1401 McKinney Street, Ste. 1900 Houston, TX 77010 (713)752-4439	Stewart.Kuser@Kuserlaw.com Giovanni.Raimondi@Kuserlaw.com tleonard@jw.com
Counsel for Defendant David A. Schoenholz	
Dawn Marie Canty Gil M. Soffer KATTEN MUCHIN ROSENMAN LLP 525 West Monroe Street Chicago, Illinois 60661 (312)902-5253	dawn.canty@kattenlaw.com gil.soffer@kattenlaw.com
Counsel for Defendant William F. Aldinger	
David S. Rosenbloom C. Maeve Kendall McDERMOTT WILL & EMERY, LLP 227 West Monroe Street Chicago, IL 60606 (312) 984-2175	drosenbloom@mwe.com makendall@mwe.com
Counsel for Defendant Gary Gilmer	

Counsel	E-mail address
<p>R. Ryan Stoll Mark E. Rakoczy Andrew J. Fuchs Donna L. McDevitt Patrick Fitzgerald SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 155 North Wacker Drive Chicago, IL 60606 (312)407-0700</p> <p>Paul D. Clement D. Zachary Hudson BANCROFT PLLC 1919 M Street NW, Ste. 470 Washington, DC 20036 (202)234-0090</p> <p>Dane H. Butswinkas Steven M. Farina Leslie C. Mahaffey Amanda M. MacDonald WILLIAMS & CONNOLLY LLP 725 Twelfth Street NW Washington DC 20005 202-434-5000</p> <p>Luke DeGrand Tracey L. Wolfe DEGRAND & WOLFE, P.C. 20 South Clark Street Suite 2620 Chicago, Illinois 60603 (312) 236-9200 (312) 236-9201 (fax)</p>	<p>rstoll@skadden.com mrakoczy@skadden.com Andrew.Fuchs@skadden.com Donna.McDevitt@skadden.com Patrick.Fitzgerald@skadden.com pclement@bancroftpllc.com zhudson@bancroftpllc.com TKavaler@cahill.com Jhall@cahill.com dbutswinkas@wc.com sfarina@wc.com lmahaffey@wc.com amacdonald@wc.com twolfe@degrandwolfe.com ldegrand@degrandwolfe.com</p>
<p>Counsel for Defendant Household International Inc.</p>	
<p>Michael J. Dowd Spencer A. Burkholz Daniel S. Drosman Luke O. Brooks Hillary B. Stakem ROBBINS GELLER RUDMAN & DOWD LLP 655 West Broadway, Suite 1900</p>	<p>miked@rgrdlaw.com spenceb@rgrdlaw.com dand@rgrdlaw.com lukeb@rgrdlaw.com hstakem@rgrdlaw.com jdavis@rgrdlaw.com mmueller@rgrdlaw.com</p>

Counsel	E-mail address
<p>San Diego, CA 92101 (619)231-1058 619/231-7423 (fax)</p> <p>Jason C. Davis ROBBINS GELLER RUDMAN & DOWD LLP Post Montgomery Center One Montgomery Street, Suite 1800 San Francisco, CA 94104 (415)288-4545 (415)288-4534 (fax)</p> <p>Maureen E. Mueller ROBBINS GELLER RUDMAN & DOWD LLP 120 East Palmetto Park Road, Suite 500 Boca Raton, FL 33432 (561)750-3000 (561)750-3364 (fax)</p>	
<p>Lead Counsel for Plaintiffs</p>	
<p>Marvin A. Miller Lori A. Fanning MILLER LAW LLC 115 S. LaSalle Street, Suite 2910 Chicago, IL 60603 (312)332-3400 (312)676-2676 (fax)</p>	<p>Mmiller@millerlawllc.com Lfanning@millerlawllc.com</p>
<p>Liaison Counsel for Plaintiffs</p>	

EXHIBIT A

EXHIBIT A

1. Slevin & Hart (Fund Counsel) Fees and Expenses \$10,066.45
2. Fund Employees:

	HOURLY	HOURS	LABOR	+ BENEFIT
Wieck	\$73.71	40.00	\$2,948.40	\$4,422.60
Ellis	\$33.05	5.00	\$165.25	\$247.88
England	\$65.65	4.50	\$295.43	\$443.14
Haley	\$45.81	1.00	\$45.81	\$68.72
Ray	\$25.52	1.00	\$25.52	\$38.28
				\$5,220.61