

**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 Jorge L. Alonso
HOUSEHOLD INTERNATIONAL, INC., et )	
al., )	
Defendants. )	
_____ )	

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

I, TREVOR ENGLAND, declare as follows:

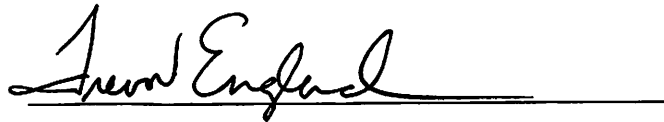
1. I respectfully submit this Supplemental Declaration in support of PACE Industry Union-Management Pension Fund’s (“PACE”) application for an award of expenses pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”), 15 U.S.C. §78u-4(a)(4).
2. I am the Chief Executive Officer for PACE and responsible for administering the daily operations of the Fund and report to the Board of Trustees.
3. 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 \$14,008.62. *See id.*

4. In response to the Court's request, I have reviewed our records, and am submitting additional detail in support of our Motion for Reimbursement. *See Exhibit A* attached. Upon further review of our records, I believe expenses related solely to the negotiation of attorney's fees were included in PACE's earlier declaration, but should be excluded. Consistent with that, I am revising the total amount of expenses sought by PACE.

5. On behalf of PACE, I appreciate the Court's consideration of the foregoing and attached, 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 25th day of October, 2016, at Nashville, Tennessee.

A handwritten signature in black ink, reading "Trevor England", is written over a horizontal line.

TREVOR ENGLAND  
On behalf of PACE Industry Union Management  
Pension Fund

**EXHIBIT A**

## 1. Slevin &amp; Hart (Fund Counsel) Fees and Expenses

Discovery, including preparation for deposition and responses to written discovery	\$3,247.50
Review filings, drafts of filings and correspondence regarding filings	\$1,560.00
Settlement, including discussions and review of correspondence	\$611.50
Case strategy and analysis, including proposed substitution of counsel and other strategic discussions and analysis	\$1,866.00
Trial, including preparation	\$35.00
Periodic client-related updates and case-status updates	\$1,468.00
<b>TOTAL</b>	<b>\$8,788.00</b>

## 2. Fund Employees, using the same categories as detailed above:

	<b>HOURLY</b>	<b>HOURS</b>	<b>LABOR</b>	<b>+BENEFIT</b>
<b>Wieck</b>				
Discovery	73.71	32.00	2,358.72	3,538.08
Review filings	73.71	6.00	442.26	663.39
Settlement	73.71	2.00	147.42	221.13
<b>Ellis</b>				
Discovery	33.05	5.00	165.25	247.88
<b>England</b>				
Updates	65.65	4.50	295.43	443.14
<b>Haley</b>				
Settlement	45.81	1	45.81	68.72
<b>Ray</b>				
Settlement	25.52	1	25.52	38.28

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 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 October 27, 2016.

s/ Michael J. Dowd

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MICHAEL J. DOWD

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