UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

Behalf of Itself and All Others Similarly	(Consolidated)
Situated,	(Consolidated)
Plaintiff,	<u>CLASS ACTION</u>
VS.	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et)	
Defendants.	
,)	

DECLARATION OF LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS'
REPLY ON MOTION TO COMPEL RESPONSES TO FIRST SET OF
INTERROGATORIES FROM HOUSEHOLD DEFENDANTS

I, LUKE O. BROOKS, declare as follows:

I am an attorney duly licensed to practice before all of the courts of the State of California

and I am also admitted to the General Bar for the United States District Court for the Northern

District of Illinois. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman &

Robbins LLP, one of the counsel of record for plaintiffs in the above-entitled action. I have personal

knowledge of the matters stated herein and, if called upon, I could and would competently testify

thereto.

Attached are true and correct copies of the following exhibits: 1.

Exhibit 1: HHS 02127509-8208; and

Exhibit 2: Excerpts from the Answer of Defendants Household International, Inc.,

> Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar to [Corrected] Amended Consolidated Class

Action Complaint evidencing affirmative defenses asserted.

I declare under penalty of perjury under the laws of the State of California that the foregoing

is true and correct. Executed this 27th day of September, 2005, at San Francisco, California.

/s/ Luke O. Brooks LUKE O. BROOKS

T:\CasesSF\Household Intl\DEC00024650.doc

DECLARATION OF SERVICE BY UPS OVERNIGHT AND BY EMAIL

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 Francisco, over the age of 18 years, and not a party to

or interested party in the within action; that declarant's business address is 100 Pine Street,

Suite 2600, San Francisco, California 94111.

2. That on September 27, 2005, declarant served by UPS Overnight (with exhibits) and

by email (without exhibits) the: DECLARATION OF LUKE O. BROOKS IN SUPPORT OF

LEAD PLAINTIFFS' REPLY ON MOTION TO COMPEL RESPONSES TO FIRST SET OF

INTERROGATORIES FROM HOUSEHOLD DEFENDANTS to the parties listed on the

attached Service List. The parties' email addresses are as follows:

TKavaler@cahill.com

PSloane@cahill.com

LBest@cahill.com

NEimer@EimerStahl.com

ADeutsch@EimerStahl.com

sparzen@mayerbrownrowe.com

lnale@mayerbrown.com

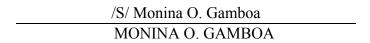
scharles@mayerbrownrowe.com

mmiller@millerfaucher.com

lfanning@millerfaucher.com

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th

day of September, 2005, at San Francisco, California.



HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 9/27/2005 (02-0377) Page 1 of 2

Counsel for Defendant(s)

Thomas J. Kavaler
Peter Sloane
Landis Best
Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005-1702
212/701-3000
212/269-5420 (Fax)

Lucia Nale Stanley J. Parzen Debra L. Bogo-Ernst Mayer, Brown, Rowe & Maw LLP 71 South Wacker Drive Chicago, IL 60606 312/782-0600 312/701-7711 (Fax) Nathan P. Eimer Adam B. Deutsch Eimer Stahl Klevorn & Solberg LLP 224 South Michigan Avenue, Suite 1100 Chicago, IL 60604 312/660-7600 312/692-1718 (Fax)

Counsel for Plaintiff(s)

Lawrence G. Soicher Law Offices of Lawrence G. Soicher 305 Madison Avenue, 46th Floor New York, NY 10165 212/883-8000 212/697-0877 (Fax)

Patrick J. Coughlin Azra Z. Mehdi Monique C. Winkler Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine Street, Suite 2600 San Francisco, CA 94111-5238 415/288-4545 415/288-4534 (Fax) William S. Lerach Lerach Coughlin Stoia Geller Rudman & Robbins LLP 655 West Broadway, Suite 1900 San Diego, CA 92101 619/231-1058 619/231-7423(Fax)

Marvin A. Miller
Jennifer Winter Sprengel
Lori A. Fanning
Miller Faucher and Cafferty LLP
30 N. LaSalle Street, Suite 3200
Chicago, IL 60602
312/782-4880
312/782-4485 (Fax)

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 9/27/2005 (02-0377) Page 2 of 2

David R. Scott Scott + Scott, LLC 108 Norwich Avenue Colchester, CT 06415 860/537-5537 860/537-4432(Fax)