

**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.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' SUBMISSION
REGARDING POST-CLASS PERIOD DOCUMENTS SUBMITTED PURSUANT TO
THE COURT'S MARCH 9, 2006 DIRECTION**

I, Luke O. Brooks, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and the United States District Court, 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 make this declaration based upon personal knowledge of the matters stated herein and, when indicated, information and belief. If called upon, I could and would competently testify thereto.

2. At the meet and confers on October 20 and 21, 2004 related to the First Request for Production of Documents, the Class requested that defendants produce relevant post-Class Period documents and provided a detailed explanation of why these documents are relevant to this case.

3. I am informed and believe that during meet and confers on May 20, July 18, and August 29 of 2005 related to the Second Request for Production of Documents, the Class further requested relevant post-Class Period documents and again explained the relevancy of these documents to defendants. The May 25 and July 27, 2005 letters from Sylvia Sum to Landis Best, memorializing the May 20 and July 18, 2005 meet and confers, are attached as Exhibits 1 and 2.

4. In addition to meet and confers, the Class raised the issue of producing relevant post-Class Period documents to defendants by letter on at least two other occasions. The November 1, 2005 letter from Sylvia Sum to Landis Best and the December 2, 2005 letter from Sylvia Sum to Craig S. Kesch are attached as Exhibits 3 and 4. Defendants replied in writing and refused to produce all relevant post-Class Period documents. The November 14 and December 7, 2005 letters from Craig S. Kesch to Sylvia Sum are attached as Exhibits 5 and 6.

5. I am informed and believe that on March 15, 2006, the Class met and conferred with defendants pursuant to the Court's March 9, 2006 instructions. During the meet and confer, the Class narrowed the post-Class Period discovery to specific requests and explained to defendants why

these documents are relevant to the case. Defendants sought an “all or nothing deal,” but refused to explain what was entailed in their compromise. Defendants refused to produce relevant post-Class Period documents and informed the Class the same in writing on the same day. The March 15, 2006 letter from Azra Mehdi to Landis Best memorializing the meet and confer and the March 16, 2006 response from Landis Best to Azra Mehdi are attached as Exhibits 7 and 8.

6. Several market analysts made observations regarding the expected impact of the October 2002 settlement between the multi-state Attorneys General and Household. The October 11, 2002 report, prepared by Merrill Lynch, is attached as Exhibit 9. An excerpt of Household’s September to October 2002 Investor Relations Report, quoting the October 14, 2002 Prudential Securities report, is attached as Exhibit 10. The November 15, 2002 *Wall Street Journal* article is attached as Exhibit 11.

7. The Consent Decree, entered into by Household and the United States Securities and Exchange Commission on March 18, 2003, is attached as Exhibit 12.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March, 2006, at San Francisco, California.

/s/ LUKE O. BROOKS

LUKE O. BROOKS

DECLARATION OF SERVICE BY EMAIL AND BY U.S. 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 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 March 20, 2006, declarant served by electronic mail and by U.S. Mail the **DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' SUBMISSION REGARDING POST-CLASS PERIOD DOCUMENTS SUBMITTED PURSUANT TO THE COURT'S MARCH 9, 2006 DIRECTION** to the parties listed on the attached Service List. The parties' email addresses are as follows:

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and by U.S. Mail to:

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Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of March, 2006, at San Francisco, California.

/s/ Marcy Medeiros

MARCY MEDEIROS

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 3/20/2006 (02-0377)

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