

**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' MOTION TO
ENFORCE THE COURT'S MARCH 9 AND MARCH 17, 2006 ORDERS**

REDACTED VERSION

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 am admitted to the General Bar of 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 and the Class 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.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the Transcript of Proceedings, held on March 9, 2006, before the Honorable Nan R. Nolan.

3. Attached hereto as Exhibit B is a true and correct copy of the Honorable Nan R. Nolan's March 9, 2006 Order.

4. Attached hereto as Exhibit C is a true and correct copy of an email from Luke O. Brooks to Landis C. Best dated March 13, 2006.

5. Attached hereto as Exhibit D is a true and correct copy of an email from Azra Z. Mehdi to Landis C. Best and Patricia Farren dated March 10, 2006.

6. Attached hereto as Exhibit E is a true and correct copy of the March 15, 2006 letter from Azra Z. Mehdi to Landis C. Best memorializing the meet and confer that took place on March 15, 2006 between Class counsel Azra Z. Mehdi, Sylvia Sum, Bing Z. Ryan and Lori A. Fanning and counsel for the Household Defendants Landis C. Best, Ira J. Dembrow and Craig S. Kesch.

7. Attached hereto as Exhibit F is a true and correct copy of the March 16, 2006 letter from Landis C. Best to Azra Z. Mehdi memorializing the meet and confer that took place on March 15, 2006 between Class counsel Azra Z. Mehdi, Sylvia Sum, Bing Z. Ryan and Lori A. Fanning and counsel for the Household Defendants Landis C. Best, Ira J. Dembrow and Craig S. Kesch.

8. Attached hereto as Exhibit G is a true and correct copy of a letter from Azra Z. Mehdi to Landis C. Best dated March 24, 2006.

9. Attached hereto as Exhibit H is a true and correct copy of a letter from Landis C. Best to Azra Z. Mehdi dated March 27, 2006.

10. Attached hereto as Exhibit I is a true and correct copy of a letter from Landis C. Best to Azra Z. Mehdi dated March 30, 2006.

11. Attached hereto as Exhibit J is a true and correct copy of the March 31, 2006 letter from Azra Z. Mehdi to Landis C. Best memorializing the meet and confer that took place on March 31, 2006 between Class counsel Azra Z. Mehdi and Luke O. Brooks and counsel for the Household Defendants Landis C. Best and Ira Dembrow.

12. Attached hereto as Exhibit K is a true and correct copy of a letter from D. Cameron Baker to Landis C. Best dated March 31, 2006.

13. Attached hereto as Exhibit L is a true and correct copy of a letter from Azra Z. Mehdi to the Honorable Nan R. Nolan on March 16, 2006.

14. Attached hereto as Exhibit M is a true and correct copy of Judge Nan R. Nolan's March 17, 2006 Order.

15. Attached hereto as Exhibit N is a true and correct copy of a letter from Landis C. Best to Azra Z. Mehdi dated March 24, 2006.

16. Attached hereto as Exhibit O is a true and correct copy of a letter from Lori A. Fanning to Judge Nan R. Nolan dated March 17, 2006.

17. Attached hereto as Exhibit P is a true and correct copy of a letter from KMZ Rosenman to Kent McAlister dated January 21, 2004, Bates numbered HHS 02765165-69.

18. Attached hereto as Exhibit Q is a true and correct copy of the Stipulation and Order Providing for Household International, Inc. to Preserve and Maintain Relevant Documents in the United States, filed on April 17, 2003.

19. Attached hereto as Exhibit R is a true and correct copy of a letter from Landis C. Best to the Honorable Nan R. Nolan on October 13, 2005.

20. Attached hereto as Exhibit S is a true and correct copy of excerpts of the transcript from the Deposition of Christine Cunningham, on November 11, 2004.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 3rd day of April, 2006, at San Francisco, California.

/s/ Luke O. Brooks

LUKE O. BROOKS

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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 April 3, 2006, declarant served by electronic mail and by U.S. Mail the **DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' MOTION TO ENFORCE THE COURT'S MARCH 9 AND MARCH 17, 2006 ORDERS (REDACTED VERSION)** 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
mmiller@millerfaucher.com
lfanning@millerfaucher.com

and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
305 Madison Ave., 46th Floor
New York, New York 10165

David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of April, 2006, at San Francisco, California.

/s/ Monina O. Gamboa

MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 4/3/2006 (02-0377)

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Counsel for Defendant(s)

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

Stanley J. Parzen
Mayer, Brown, Rowe & Maw LLP
71 South Wacker Drive
Chicago, IL 60606
312/782-0600
312/701-7711(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)

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)

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)

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)

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David R. Scott

Scott + Scott, LLC

108 Norwich Avenue

Colchester, CT 06415

860/537-5537

860/537-4432 (Fax)