

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, ON
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

- *against* -

HOUSEHOLD INTERNATIONAL, INC., ET. AL.,

Defendants.

Lead Case No. 02-C-5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**AFFIDAVIT OF DAVID R. OWEN IN SUPPORT OF
HOUSEHOLD DEFENDANTS' MOTION TO COMPEL
RESPONSES TO HOUSEHOLD DEFENDANTS' SECOND
SET OF INTERROGATORIES TO LEAD PLAINTIFFS**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

DAVID R. OWEN, being first duly sworn, deposes and says:

1. I am a member of the bar of the State of New York, admitted to this Court *pro hac vice* in connection with the above caption matter, and a member of the firm Cahill Gordon & Reindel LLP, co-counsel for defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar in this action. I make this affidavit to place before the Court certain documents in support of Household Defendants' Motion to Compel Responses to Household Defendants' Second Set of Interrogatories to Lead Plaintiffs.

2. Attached hereto as Exhibit 1 is a true and correct copy of the November 10, 2005 Order of Magistrate Judge Nan R. Nolan in this case.

3. Attached hereto as Exhibit 2 is a true and correct copy of the Lead Plaintiffs' Memorandum in Support of Motion to Compel Responses to First Set of Interrogatories From Household Defendants filed on September 6, 2005.

4. Attached hereto as Exhibit 3 is a true and correct copy of the Memorandum of Law in Opposition to Lead Plaintiffs' Motion to Compel Responses to First Set of Interrogatories From Household Defendants filed on September 20, 2005.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Lead Plaintiffs' Reply in Support of Motion to Compel Responses to First Set of Interrogatories From Household Defendants filed on September 27, 2005.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Lead Plaintiffs' Second Set of Interrogatories Propounded to Defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar served on Defendants on September 21, 2005 by counsel for Plaintiffs.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Defendants Household International, Inc., Household Finance Corporation and J.A. Vozar's Fourth Amended Responses and Objections to Lead Plaintiffs' Second Set of Interrogatories served on Plaintiffs on March 24, 2006 by counsel for Defendants.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Household Defendants' Second Set of Interrogatories to Lead Plaintiffs served on Plaintiffs on February 13, 2006 by counsel for Defendants.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Lead Plaintiffs' Supplemental Responses and Objections to Household's [Fourth] Set of Interrogatories to Lead Plaintiffs served on Defendants on May 25, 2006 by counsel for Plaintiffs.

10. Attached hereto as Exhibit 9 is a true and correct copy of the transcript of the April 27, 2006 meet and confer conference call between counsel for Plaintiffs and counsel for Defendants.

11. Attached hereto as Exhibit 10 is a true and correct copy of the June 15, 2006 Transcript of Proceedings—Motions Before the Honorable Nan R. Nolan, Magistrate Judge.



David R. Owen

Sworn to before me this
29th day of June, 2006.



Notary Public

STELLA L. MAROTTA
Notary Public, State of New York
No. 01MA254480
Qualified in Kings County
Certificate Filed in New York County
Commission Expires April 30, 2007