

**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 D. CAMERON BAKER IN SUPPORT OF THE CLASS' MOTION
FOR ADDITIONAL DEPOSITION TIME PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 30(d)(2)**

I, D. CAMERON BAKER, 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 United States District Court in the Northern District of Illinois. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel 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 are true and correct copies of the following exhibits:

Exhibit A: String of emails from Jason Otto to D. Cameron Baker re: Jaffe v. Household, dated April 26, 2006;

Exhibit B: Transcript of Proceedings Before the Honorable Nan R. Nolan, Magistrate Judge, dated June 15, 2006;

Exhibit C: Email from D. Cameron Baker to David Owen re: Depositions, dated June 19, 2006;

Exhibit D: Email from David Owen to D. Cameron Baker re: Depositions, dated June 22, 2006;

Exhibit E: Letter from Craig S. Kesch to D. Cameron Baker re: Discovery, dated June 1, 2006; and

Exhibit F: String of emails between David Owen and D. Cameron Baker, starting June 16, 2006.

3. Household has produced over 62,000 pages of documents from Ms. Sodeika's files, including numerous emails and hand-written notes.

4. On April 24, 2006, I requested in a telephonic meet and confer that Household agree to extend the deposition of Ms. Sodeika beyond seven hours. In response, counsel for Household stated that they would not agree in advance to the extension, but would consider it in "good faith" at the conclusion of seven hours. The parties then scheduled Ms. Sodeika's deposition for June 6, 2006 with the date of June 7, 2006 available as a second day.

5. The Class had requested a resume or similar document be produced in response to its Notice of Deposition. Household objected to producing a resume or similar document and did not alter this position during the subsequent meet and confer process. As part of the meet and confer over the length of the Sodeika deposition, the Class requested that Household reconsider its objection to producing a resume as provision of a resume would expedite the deposition. Household responded that it would do so only if the Class agreed “not to question her on the subjects set forth therein.” *See* Exhibit A to this Declaration. I did not agree to this limitation and thus, Household did not produce Ms. Sodeika’s resume or similar document.

6. The Class has deposed Ms. Sodeika for slightly less than seven hours. The Class was unable to depose Ms. Sodeika on a number of significant topics in this initial session. These topics include Ms. Sodeika’s involvement in internal investigations by Household into complaints, including the “Effective Rate Complaints” and complaints emanating from the Bellingham, Washington branch office, as well as further examination of her with respect to: a) the settlement discussions with the Attorneys General and the resulting \$484 settlement million agreement; b) communications with ACORN, the Attorneys General and the state regulators as to predatory lending complaints; c) Household’s efforts to develop lending “best practices;” and d) Household’s internal discussions on the foregoing topics.

7. Household has refused to produce Ms. Sodeika for a further day of deposition.

8. After the status conference, in effort to avoid filing this motion the Class narrowed its request for extended depositions to Ms. Sodeika, Ms. Allcock and Mr. Pantelis and the four named individual defendants and requested that Household stipulate to extending these depositions and producing a resume or similar document in light of the Court’s comments. *See* Exhibit C hereto. Notwithstanding the Court’s comments and this narrow request for relief, Household refused to make this stipulation. *See* Exhibit D hereto.

9. To date, Household has produced 10,559 documents (not pages) with Ms. Allcock's name. By letter dated June 1, 2006, Household advised the Class that it had recently discovered an additional 21 boxes of Ms. Allcock's files. *See* Exhibit E hereto. To date, Household has only produced a box and a half of these files.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of June, 2006, at San Francisco, California.

s/ D. Cameron Baker

D. CAMERON BAKER