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,
 	
   vs.
 	
HOUSEHOLD INTERNATIONAL, INC., et al.,
 	
                   Defendants.
	Lead Case No. 02-C-5893
	(Consolidated)
	
	CLASS ACTION
	
	Judge Ronald A. Guzman
	Magistrate Judge Nan R. Nolan

DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' MOTION FOR AUTHORIZATION PURSUANT TO THE WALSH ACT FOR ISSUANCE OF SUBPOENA FOR ANDREW KAHR

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. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiff 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.   Pursuant to the Court's November 30, 2006 instructions, I inquired into when the Class first learned of Andrew Kahr. Based on these inquiries, I am informed of and believe the following:

(a)   In February 2006, as part of its review of defendants' document production, the Class discovered that Mr. Kahr acted as a consultant for Household during the Class Period. At that time the Class did not fully understand Mr. Kahr's role at Household.

(b)   Over the course of the next several weeks, the Class began to gain a better understanding of Mr. Kahr's role at Household. For example, the Class learned that Mr. Kahr was hired by defendant Aldinger to introduce "opportunistic" measures to initiate growth.

(c)   The Class also conducted an investigation of Mr. Kahr independent of the documents produced by defendants and discovered in late March or early April that not only had Mr. Kahr been a consultant to Household but also was the founder, and later, a consultant with Providian, another sub-prime lender which paid more than $400 million to settle charges of unfair business practices.

(d)   Based on its investigation, the Class determined that it would depose Mr. Kahr and drafted a subpoena. In May 2006, counsel for the Class instructed its in-house investigator, Diana Schneider, to locate and serve Mr. Kahr with a subpoena. Subsequently, counsel for the Class directed Ms. Schneider's attempts to serve Mr. Kahr.

3.   On December 4, 2006, I contacted a travel agent and requested an estimate of the cost

for: (1) a round trip ticket from Paris, France to Chicago, Illinois for the week of travel from Paris,

France, departing January 15, 2007 and returning January 18, 2007 and (2) hotel accommodations in

Chicago for the three nights. The total estimated cost was: $2,733 ($1,683 flight, $900 hotel and

$150 incidentals).

4.   Attached hereto are true and correct copies of the following:

Exhibit 1:   Memorandum from Gary Gilmer to Bill Aldinger, et al., attaching "Initiatives
to Accelerate Growth of U.S. Consumer Finance," dated January 27, 1999;

Exhibit 2:   *SFGate.com* article by Sam Zuckerman, entitled "How Providian misled card
holders," dated May 5, 2002;

Exhibit 3:   Transcript from the PBS program *Frontline's* broadcast entitled "Secret
History of the Credit Card," posted November 24, 2004, at
http://www.pbs.org/wgbh/pages/frontline/shows/credit/etc/script/html;

Exhibit 4:   Memorandum from Gary Gilmer to Bill Aldinger re "December and YTD
Operating Results," dated January 18, 1999;

Exhibit 5:   Memorandum from Andrew Kahr to Chuck Colip, *et al.*, re "Projects," dated
January 1, 2002;

Exhibit 6:   Memorandum from Andrew Kahr to Joe Vozar, *et al.*, re "Redoing HFC
Mortgage Forms to Impose High Prepayment Penalties," dated March 20,
1999; and

Exhibit 7:   Email from David A. Schoenholz to Kenneth H. Robin re "Kahr Memos,"
dated June 28, 2002.

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

is true and correct. Executed this 4th day of December, 2006, at San Francisco, California.

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LUKE O. BROOKS

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