UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,	Lead Case No. 02-C-5893 (Consolidated)
Plaintiff,	CLASS ACTION
- against -	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolar
HOUSEHOLD INTERNATIONAL, INC., ET. AL.,	

Defendants.

DECLARATION OF JANET A. BEER IN SUPPORT OF THE HOUSEHOLD DEFENDANTS' MEMORANDUM IN OPPOSITION TO PLAINTIFFS' OBJECTIONS TO THE MAGISTRATE JUDGE'S DECEMBER 6, 2006 ORDER

I, JANET A. BEER, declare as follows:

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-captioned matter, and associated with 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. Unless otherwise stated, I have personal knowledge of the matters stated herein and, if called upon, could testify competently thereto. I submit this declaration to place before the Court certain information and documents referenced in the Household Defendants' Memorandum of Law in Opposition to Plaintiffs' Objections to the Magistrate Judge's December 6, 2006 Order.

- 2. Attached hereto as <u>Exhibit 1</u> is a true and correct copy of Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Further Responses to the Class' Questions for Per Ekholdt Concerning Exhibit 13 and the Production of Documents Underlying Wilmer, Cutler & Pickering Reports.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Janet A. Beer in Support of Household Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Further Responses to the Class' Questions for Per Ekholdt Concerning Exhibit 13 and the Production of Documents Underlying Wilmer, Cutler & Pickering Reports dated November 3, 2006, with Exhibits A through J as filed.
- 4. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of James R. Wrathall, dated November 3, 2006, with Exhibit A as filed.
- 5. Attached hereto as Exhibit 4 is a true and correct copy of the Final Report to the Audit Committee of the Board of Directors of Household International, Inc. Concerning Allegations of Elaine Markell with Respect to Loan Restructuring Practices of Household Mortgage Services, dated March 24, 2003, a copy of which was produced to Plaintiffs in this litigation bearing Bates numbers HI KPMG 019161.01 019161.11.

Executed this 10th Day of January, 2007 in New York, New York

Janet A. Beer