

**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 JASON C. DAVIS IN SUPPORT OF THE CLASS' MOTION TO
COMPEL PRODUCTION OF ERNST & YOUNG LLP DOCUMENTS AND FOR
SANCTIONS FOR DEFENDANTS' CONTINUING VIOLATIONS OF
JUDGE GUZMAN'S FEBRUARY 1, 2007 ORDER AND THIS
COURT'S DECEMBER 6, 2006 ORDER**

I, JASON C. DAVIS, 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. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for Lead 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: Excerpt of Household privilege log relating to Ernst & Young documents;
- Exhibit B: Letter from Jason C. Davis to Susan Buckley dated February 16, 2007;
- Exhibit C: Letter from Lucia Nale of Mayer Brown Rowe & Maw to Cameron Baker dated February 21, 2007;
- Exhibit D: Letter from Amy Barabas to Jason C. Davis dated February 20, 2007;
- Exhibit E: E-mail from Landis Best to Cameron Baker dated February 21, 2007; and
- Exhibit F: E-mail correspondence between Cameron Baker and Landis Best dated February 22, 2007.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22nd day of February, 2007, at San Francisco, California.

s/ Jason C. Davis

JASON C. DAVIS