

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

<hr/> <p>LAWRENCE E. JAFFE PENSION PLAN, On Behalf of Itself and All Others Similarly Situated,  <p style="text-align:right">Plaintiff,</p></p>	)	Lead Case No. 02-C-5893 (Consolidated)
- <i>against</i> -	)	CLASS ACTION
Household International, Inc., et al.,  <p style="text-align:right">Defendants.</p> <hr/>	)	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

**DECLARATION OF DAVID R. OWEN IN SUPPORT OF THE HOUSEHOLD  
DEFENDANTS' MOTION TO COMPEL DISCOVERY PURSUANT TO RULE  
26(A)(1)(C) AND THIS COURT'S ORDERS, OR IN THE ALTERNATIVE FOR A  
RECOMMENDATION OF PRECLUSION**

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I, DAVID R. OWEN, 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 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 hereby submit this affidavit to place before the Court certain documents referenced in the Household Defendants' Motion to Compel Discovery Pursuant

To Rule 26(a)(1)(C) And This Court's Orders, Or In The Alternative For A Recommendation Of Preclusion.

2. Attached hereto as Exhibit 1 is a true and correct copy of the Report of Daniel R. Fischel (exhibits omitted) which was served upon Defendants by Plaintiffs in this action on August 15, 2007.

3. Attached hereto as Exhibit 2 is a true and correct copy of The Lead Plaintiffs' Opposition To Presentment of Defendants' Premature Motion For Summary Judgment, Which They Entitle A "Motion to Implement", which was served upon Defendants by Plaintiffs in this action on August 31, 2007.

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' Initial Disclosures Pursuant to Federal Rule Of Civil Procedure 26(a)(1), served upon Defendants by Plaintiffs in this action on June 25, 2004 by counsel for Plaintiffs.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Court's September 20, 2004 Order of the Honorable Nan R. Nolan in this case.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Court's June 29, 2007 Order of the Honorable Nan R. Nolan in this case.

7. Attached hereto as Exhibit 6 is a true and correct copy of the September 18, 2007 letter from David R. Owen to Spence Burkholz.

8. Attached hereto as Exhibit 7 is a true and correct copy of the September 24, 2007 letter from David. R. Owen to Azra Z. Mehdi.

9. Attached hereto as Exhibit 8 is a true and correct copy of the September 27, 2007 letter from David R. Owen to Azra Z. Mehdi.

10. Attached hereto as Exhibit 9 is a true and correct copy of the September 28, 2007 letter from Azra Z. Mehdi to David R. Owen.

11. Attached hereto as Exhibit 10 is a true and correct copy of the September 20, 2007 letter from Azra Z. Mehdi to David R. Owen.

12. Attached hereto as Exhibit 11 is a true and correct copy of the Memorandum of Law In Support of The Household Defendants' Motion For Implementation Of This Court's February 28, 2006 Order, which was served upon Plaintiffs by Defendants in this action on August 30, 2007.

Executed this 5th day of October, 2007, in New York, New York.

/s/ David R. Owen  
David R. Owen