

**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,

- against -

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 THOMAS J. KAVALER IN SUPPORT OF  
DEFENDANTS' OMNIBUS MOTION *IN LIMINE* TO EXCLUDE OR LIMIT 14  
CATEGORIES OF EVIDENCE**

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STATE OF NEW YORK     )  
                                      : ss.:  
COUNTY OF NEW YORK    )

I, THOMAS J. KAVALER, declare as follows:

1. I am a member of the bar of the State of New York and a member of the firm of Cahill Gordon & Reindel LLP, attorneys for Defendants Household International, Inc., Household Finance Corporation (collectively "Household"), William F. Aldinger, David A. Schoenholz and Gary Gilmer (the "Individual Defendants" and, collectively with Household, the "Household Defen-

dants” or “Defendants”).<sup>1</sup> I am admitted *pro hac vice* in this Court for this action. I submit this Declaration to place before the Court certain information and documents referenced in the Memorandum of Law in Support of Defendants’ Omnibus Motion *In Limine* to Exclude or Limit 14 Categories of Evidence. I make this declaration based on my personal knowledge as well as my review of relevant documents.

2. Attached hereto as Exhibits 1-41 are true and correct copies of the documents identified below.

EXHIBIT	START BATES	END BATES	DATE	DESCRIPTION
1			4/6/2005	Deposition Transcript of Elaine Markell, excerpted
2			3/31/2006	Letter from Douglas W. Roeder, Senior Deputy Comptroller, OCC, to D. Cameron Baker re: information request
3			4/6/2006	Letter from Dirk S. Roberts, Special Counsel, Office of Thrift Supervision, to D. Cameron Baker re: use of certain unpublished OTS information
4			4/11/2006	Letter from Jack D. Smith, Deputy General Counsel, FDIC, to Azra Z. Mehdi re: information request
5			5/24/2006	Deposition Transcript of Robert O’Han, excerpted
6			7/28/2006	Deposition Transcript of Paul Creatura, excerpted

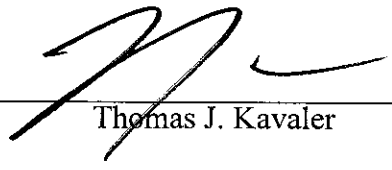
<sup>1</sup> Plaintiffs have acknowledged that no claims have been asserted against defendants Joseph A. Vozar (“Vozar”) and Household Finance Corporation (“HFC” and, collectively with Vozar, the “Non-Class Action Defendants”) on behalf of the Class, and that no claim or claims that will be at issue in the trial scheduled to begin on March 30, 2009 have been asserted or will be tried against Vozar or HFC. The Non-Class Action Defendants do not waive, but on the contrary, each expressly reserves and intends to preserve, the right to adopt, amend, supplement or re-assert the arguments set forth in the referenced Motion to the extent that Plaintiffs at any future time seek to introduce the evidence discussed in the Motion in a trial of claims asserted against Vozar and HFC.

EXHIBIT	START BATES	END BATES	DATE	DESCRIPTION
7			11/7/2006	Deposition Transcript of Dennis Hueman, excerpted
8			12/6/2006	Memorandum Opinion and Order of Magistrate Judge N. Nolan granting Plaintiffs' Motion to Compel Documents Pertaining to Household's Consultations with Ernst & Young LLP
9			12/22/2006	Deposition Transcript of Thomas Detelich, excerpted
10			1/12/2007	Deposition Transcript of Gary Gilmer, excerpted
11			2/27/2007	Order of Magistrate Judge N. Nolan granting in part, denying in part, and entering and continuing in part Plaintiffs' Motion to Compel Production of Ernst & Young Documents
12			6/13/2007	Order of Magistrate Judge N. Nolan granting in part and denying in part Plaintiffs' Motion to Compel Production of Ernst & Young LLP Documents and for Sanctions
13			8/15/2007	Report of Catherine A. Ghiglieri, excerpted
14			8/15/2007	Report of Daniel R. Fischel, excerpted
15			2/1/2008	Lead Plaintiffs Fifth Supplemental Amended Responses and Objections to Household Defendants' [Eighth] Set of Interrogatories, excerpted
16			2/13/2008	Deposition Transcript of Catherine A. Ghiglieri, excerpted
17			2/22/08	Rule 26 Statement of Harris L. Devor, excerpted
18			4/9/2008	Deposition Transcript of Charles Cross, excerpted
19			3/28/2000	Household International Annual Report (Form 10-K), excerpted
20			3/28/2001	Household International Annual Report (Form 10-K), excerpted
21	HHS 02940017	HHS 02940045	5/7/2001	Letter from Tom Schneider to Charles Agbonkolor re: California Examination
22	HHS 02940009	HHS 02940016	6/4/2001	Letter from Tom Schneider to Charles Agbonkolor re: California Examination
23	HHS 3446709	HHS 03446711	6/29/2001	Letter from Tom Schneider to Charles Agbonkolor re: California Examination
24	H 003523	H 003526	7/28/2001	Household Press Release: Household International Redefines Best Practices in Subprime Lending

EXHIBIT	START BATES	END BATES	DATE	DESCRIPTION
25	HHS 02859015	HHS 02859018	1/3/2002	Letter from Robin Allcock to Russell M. Spain re: Virginia Examination
26	HHS 03442422	HHS 03442432	1/24/2002	Letter from Robin Allcock to Paul Swierczek re: New Jersey Examination
27	HHS 02913001	HHS 02913002	3/6/2002	Letter from Gary Gilmer to Carl LaSusa re: "Best Practices Initiatives"
28			3/13/2002	Household International Annual Report (Form 10-K), excerpted
29	HHS 02858732	HHS 02858736	4/26/2002	Letter from Robin Allcock to Nancy E. Walker re: Virginia Examination
30	HHS 02857447	HHS 02857456	5/17/2002	Letter Robin Allcock to Karen Reynolds re: Nebraska Examination
31	HHS 02857664	HHS 02857675	5/21/2002	Letter from Robin Allcock to Paul Swierczek re: New Jersey Examination
32	HHS 03452033	HHS 03452040	5/23/2002	Letter from Robin Allcock to H. James Krueger re: Oregon Examination
33			8/27/2002	Household International Amended Annual Report (Form 10-K/A), excerpted
34	HHS 02982043	HHS 02982044	8/28/2002	Letter from James Kauffman to Robert Tillman re: meeting with New Jersey Dept. of Banking staff
35	HHS 03447647	HHS 03447673	9/27/2002	Letter from Stephen Hicks to Sandra F. Rosenberg re: Colorado Examination
36	HHS 03441952	HHS 03441977	11/18/2002	Letter from Stephen Hicks to Terry R. Meyer re: Minnesota Examination
37	HHS 03441978	HHS 03442010	11/21/2002	Letter from Stephen Hicks to Terry R. Meyer re: Minnesota Examination
38			3/20/2003	Household International Annual Report (Form 10-K), excerpted
39			5/1/2007	Deposition Transcript of Todd May, excerpted
40			1/30/2007	Deposition Transcript of William F. Aldinger, excerpted

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 30th day of January, 2009, in New York, New York.



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Thomas J. Kavalier