

**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 D. CAMERON BAKER IN SUPPORT OF PLAINTIFFS’
MEMORANDUM IN OPPOSITION TO HOUSEHOLD DEFENDANTS’ DAUBERT
MOTION TO EXCLUDE THE EXPERT TESTIMONY OF
CATHERINE A. GHIGLIERI**

I, D. CAMERON BAKER, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted to the General Bar of the United States District Court in the Northern District of Illinois. I am an attorney in the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel for 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: Expert Witness Report of Catherine A. Ghiglieri, dated August 15, 2007;

Exhibit B: Rebuttal Report of Catherine A. Ghiglieri, dated February 1, 2008;

Exhibit C: Report of Robert E. Litan, dated December 10, 2007;

Exhibit D: Declaration of John L. Bley, dated January 28, 2009;

Exhibit E: Excerpts of the December 2, 2008 Hearing Transcript before the Hon. Ronald A. Guzman;

Exhibit F: Curriculum Vitae of Catherine A. Ghiglieri;

Exhibit G: Transcript Excerpts of the April 9, 2008 Deposition of Charles Cross;

Exhibit H: Household Report regarding its reaging policies and Office of Thrift Supervisor Special Compliance Examination, bates labeled HHS-OTS-00032, 38, 50, and 58-148;

Exhibit I: Transcript Excerpts of the February 13, 2008 Deposition of Catherine A. Ghiglieri;

Exhibit J: E-mail from Jason M. Hall to Catherine Ghiglieri, dated June 14, 2007;

Exhibit K: Expert Report of Roman L. Weil, dated December 10, 2007;

Exhibit L: Chicago Tribune article titled, "To Fight Predatory Lending, Regulators Need Complaints," dated January 13, 2002;

Exhibit M: Transcript excerpt of the February 4, 2003 deposition of Charles L. Cross from Luna v. Household Fin. Corp., No. 02-1635 (W.D. Wash 2004);

- Exhibit N: Letter from the Washington State Department of Financial Institutions to Gary D. Gilmer, dated March 14, 2001;
- Exhibit O: Joint Report Pursuant to Federal Rule of Civil Procedure 26 of John L. Bley and Carl A. Lasusa;
- Exhibit P: Stipulation Regarding Expert Discovery
- Exhibit Q: Excerpt from Gramlich, Edward G. Subprime Mortgages: America's Latest Boom and Bust; and
- Exhibit R: Transcript excerpt from the February 27, 2008 deposition of Robert A. Litan.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of February, 2009, at San Francisco, California.

/s/ D. Cameron Baker
D. CAMERON BAKER

DECLARATION OF SERVICE BY ELECTRONIC MAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on February 10, 2009, declarant served by electronic mail and by U.S. Mail to the parties the **DECLARATION OF D. CAMERON BAKER IN SUPPORT OF PLAINTIFFS' MEMORANDUM IN OPPOSITION TO HOUSEHOLD DEFENDANTS' DAUBERT MOTION TO EXCLUDE THE EXPERT TESTIMONY OF CATHERINE A. GHIGLIERI.**

The parties' email addresses are as follows:

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and by U.S. Mail to:

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Law Offices of Lawrence G. Soicher
110 East 59th Street, 25th Floor
New York, NY 10022

David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of February, 2009, at San Francisco, California.

/s/ Marcy Medeiros

MARCY MEDEIROS