## 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, )	CLASS ACTION
Plaintiff,	<del></del>
VS.	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan
)	
HOUSEHOLD INTERNATIONAL, INC., et )	
al.,	
Defendants.	
)	

DECLARATION OF SPENCER A. BURKHOLZ IN SUPPORT OF PLAINTIFFS'
MOTION FOR ENTRY OF JUDGMENT

# I, SPENCER A. BURKHOLZ, declare as follows:

- 1. I am an attorney duly licensed to practice before all of the courts of the State of California and I am also admitted *pro hac vice* in this Court for this action. I am a member of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiffs 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:

Ex. 1:	In re Apollo Group Inc. Sec. Litig., No. CV 04-2147 PHX-JAT, Judgment (D. Ariz. Jan. 30, 2008);
Ex. 2:	In re Apollo Group Inc. Sec. Litig., No. CV 04-2147 PHX-JAT, 2008 WL 410625 (D. Az. Feb. 13, 2008);
Ex. 3:	Relevant excerpt from HSBC Finance Corporation's SEC Form 10-K for 2009;
Ex. 4:	Relevant excerpt from HSBC Holdings plc's SEC Form 6-K dated March 2, 2009;
Ex. 5:	Relevant excerpt from HSBC Finance Corporation's SEC Form 10-Q for period ended September 30, 2009;
Ex. 6:	Thomson Street Events Transcript for full year 2008 HSBC Holdings plc Earnings Conference call on March 2, 2009;
Ex. 7:	Relevant excerpt from HSBC Finance Corporation's SEC Form 10-K for 2008;
Ex. 8:	HSBC, FT.com, Mar. 2, 2009;
Ex. 9:	Relevant excerpt from HSBC Holdings plc's Annual Report and Accounts 2009;
Ex. 10:	Relevant excerpt from Vivendi Annual Financial Report and Consolidated Financial Statements for the Year Ended December 31, 2009;
Ex. 11:	Second Supplemental Declaration of Bjorn Steinholt CFA;
Ex. 12:	Backman v. Polaroid, No. 79-1031 Mc, 1988 U.S. Dist. LEXIS 15834 (D. Mass. June 28, 1988); and
Ex. 13:	In re Apollo Group Inc. Sec. Litig., No. CV 04-2147 PHX-JAT, Order (D. Ariz. Aug. 4, 2008).

I declare under penalt	y of perjury u	nder the lav	ws of the	United	States of	f America	that the
foregoing is true and correct.	Executed this	22nd day	of March	2010, a	ıt San Di	iego, Calif	ornia.

/s/ SPENCER A. BURKHOLZ SPENCER A. BURKHOLZ

#### 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 Diego, State of California, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 655 West Broadway, Suite 1900, San Diego, California 92101.
- 2. That on March 22, 2010, declarant served by electronic mail and by U.S. Mail to the parties the DECLARATION OF SPENCER A. BURKHOLZ IN SUPPORT OF PLAINTIFFS' MOTION FOR ENTRY OF JUDGMENT.

The parties' email addresses are as follows:

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and by U.S. Mail to:

Lawrence G. Soicher, Esq. 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 22nd day of March, 2010, at San Diego, California.

/s/ Mo Maloney
Mo Maloney