

**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.)	
_____)	

[PROPOSED] ORDER APPROVING THE FORM AND MANNER OF NOTICE

WHEREAS, a consolidated action is pending before this Court styled *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*, Lead Case No. 02-C-5893 (the “Action”):

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Court does hereby approve, as to form and content, the Notice of Verdict in Favor of Plaintiff Class and Against Household International, Inc., William Aldinger, David Schoenholz, and Gary Gilmer (“Notice of Verdict”), the Proof of Claim form (the “Proof of Claim”), and the Summary Notice annexed as Exhibits 1, 2, and 3 hereto. The Court finds that the mailing and distribution of the Notice and publishing of the Summary Notice substantially in the manner and form set forth in ¶¶2-3 of this Order meet the requirements of Federal Rule of Civil Procedure 23 and due process, and is the best notice practicable under the circumstances and shall constitute due and sufficient notice to all persons entitled thereto.

2. The firm of Gilardi & Co. LLC (“Claims Administrator”) is hereby appointed to supervise and administer the notice procedure as well as the processing of claims as more fully set forth below:

(a) Lead Counsel shall make reasonable efforts to identify all Persons who are Members of the Class and not later than January 24, 2011 (the “Notice Date”), Lead Counsel shall cause a copy of the Notice of Verdict and the Proof of Claim, substantially in the forms annexed as Exhibits 1 and 2 hereto, to be mailed by first class mail to all Class Members who can be identified with reasonable effort; and

(b) Not later than February 1, 2011, Lead Counsel shall cause the Summary Notice to be published once in *USA Today*.

3. Nominees who purchased the common stock of Household for the beneficial ownership of Class Members during the Class Period shall send the Notice of Verdict and the Proof of Claim to all beneficial owners of such Household common stock within ten (10) days after receipt thereof, or, if they have not already done so in connection with the Andersen Settlement, send a list

of the names and addresses of such beneficial owners to the Claims Administrator within ten (10) days of receipt thereof, in which event the Claims Administrator shall promptly mail the Notice of Verdict and Proof of Claim to such beneficial owners. Lead Counsel shall, if requested, reimburse banks, brokerage houses or other nominees solely for their reasonable out-of-pocket expenses incurred in providing notice to beneficial owners who are Class Members, which expenses would not have been incurred except for the sending of such Notice of Verdict, subject to further order of this Court with respect to any dispute concerning such compensation.

4. Class Members who wish to participate in any award of damages shall complete and submit Proof of Claim forms in accordance with the instructions contained therein. Unless the Court orders otherwise, all Proof of Claim forms must be postmarked no later than one hundred twenty (120) days from the Notice Date. Any Class Member who does not timely submit a Proof of Claim within the time provided for, shall be barred from sharing in the distribution of the proceeds of any award of damages, unless otherwise ordered by the Court. Notwithstanding the foregoing, Lead Counsel may, in their discretion, accept late-submitted claims for processing by the Claims Administrator so long as further proceedings in the Action are not materially delayed thereby.

IT IS SO ORDERED.

DATED: _____, 2011

THE HONORABLE RONALD A. GUZMAN
UNITED STATES DISTRICT JUDGE

Submitted by:

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