

**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. )	
_____ )	

**APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO  
DEFENDANTS' OBJECTIONS TO CERTAIN CLAIMS INCLUDED IN THE REPORT  
OF CLAIMS ADMINISTRATOR GILARDI & CO. LLC**

**Exhibits Hereto Are Restricted Documents Pursuant to L.R. 26.2 Filed  
Under Seal Pursuant to Protective Order Dated November 5, 2004 and  
the Minute Order Dated October 10, 2006 (Docket 704)**

Plaintiffs hereby submit the following exhibits:

Exhibit A-1-a:	Chart of BNY Mellon Claims Challenged by Defendants;
Exhibit A-1-b:	BNY Mellon cover letter dated March 31, 2011 with proof of claim form;
Exhibit A-1-c:	Declaration of The Bank of New York Mellon, dated October 5, 2011;
Exhibit A-1-d:	BNY Mellon Certification of Signing Authority, dated August 22, 2011;
Exhibit A-2-a:	Chart of Northern Trust Claims Challenged by Defendants;
Exhibit A-2-b:	Northern Trust cover letter dated March 18, 2011 with certification and proof of claim form;
Exhibit A-2-c:	Declaration of Patrick Krull of The Northern Trust Company, dated October 3, 2011;
Exhibit A-3-a:	Chart of Bank of America Claims Challenged by Defendants;
Exhibit A-3-b:	Bank of America cover letter dated May 10, 2011 with proof of claim form;
Exhibit A-3-c:	Declaration of Bank of America, N.A., dated November 7, 2011;
Exhibit A-3-d:	Declaration of Richard Reardon of Bank of America, N.A., dated March 20, 2012;
Exhibit A-4-a:	Chart of Wells Fargo Bank NA as Trustee Claims Challenged by Defendants;
Exhibit A-4-b:	Wells Fargo Bank cover letter dated March 29, 2011 with proof of claim form and certification;
Exhibit A-4-c:	Declaration of Gail Richardson of Wells Fargo Bank NA, dated October 11, 2011;
Exhibit A-4-d:	Chart of claim numbers for each claim submitted by Wells Fargo Bank NA;
Exhibit A-5-a:	Chart of US Bank Claims Challenged by Defendants;
Exhibit A-5-b:	US Bank cover letter dated March 29, 2011 with proof of claim form and certificate;
Exhibit A-5-c:	Declaration of Scott Olson of US Bank, NA, dated October 24, 2011;
Exhibit A-6-a:	Chart of Chicago Clearing Corporation Claims Challenged by Defendants;
Exhibit A-6-b:	Chicago Clearing Corporation cover letter dated May 16, 2011 with proof of claim form;
Exhibit A-6-c:	Chicago Clearing Corporation Assignments and Agency Agreements;
Exhibit A-6-d:	Affidavits provided by Chicago Clearing Corporation's clients;
Exhibit A-7-a:	Chart of State Street Bank & Trust Claims Challenged by Defendants;
Exhibit A-7-b:	State Street Bank & Trust Company cover letter dated March 31, 2011 with proof of claim form and certification;
Exhibit A-7-c:	Declaration of Arthur Pelissier of State Street Bank & Trust Company, dated October 21, 2011;
Exhibit A-8-a:	Chart of First Manhattan Claims Challenged by Defendants;
Exhibit A-8-b:	First Manhattan cover letter dated April 26, 2011 with proof of claim form;
Exhibit A-8-c:	Declaration of Cheryl M. Kallem of First Manhattan Co., dated November 1, 2011;
Exhibit A-8-d:	Declaration of Cheryl M. Kallem of First Manhattan Co., dated March 26, 2012;
Exhibit A-9-a:	Chart of Sun Trust Claims Challenged by Defendants;
Exhibit A-9-b:	SunTrust Bank cover letter dated March 31, 2011 with proof of claim form and corporate resolution;
Exhibit A-10-a:	Chart of J.P. Morgan Lockbox Claims Challenged by Defendants;

Exhibit A-10-b:	JPMorgan cover letters with proof of claim forms;
Exhibit A-10-c	Declaration of Philip C. Roy of JPMorgan, dated November 29, 2011;
Exhibit A-11-a:	Chart of State Street Bank / IBT Legacy Claims Challenged by Defendants;
Exhibit A-11-b:	State Street Bank / IBT Legacy cover letter dated March 30, 2011 with proof of claim form and certificate;
Exhibit A-11-c:	Declaration of Arthur Pelissier of State Street Bank and Trust Company, dated October 21, 2011;
Exhibit A-12-a:	Chart of KeyBank Claims Challenged by Defendants;
Exhibit A-12-b:	KeyBank cover letter dated March 28, 2011 with proof of claim form and certification;
Exhibit A-12-c:	Declaration of Roland S. MacDonald of KeyBank, N.A., dated December 2, 2011;
Exhibit A-13-a:	Chart of JP Morgan Newark Claims Challenged by Defendants;
Exhibit A-13-b:	J.P. Morgan Asset Management-Newark cover letter dated April 1, 2011 with proof of claim form
Exhibit B-1-a:	Chart of Class Members' Claims Challenged by Defendants that Per Gilardi Provided Supporting Documentation;
Exhibit B-1-b-1-a:	Chart of MFS Claims Challenged by Defendants;
Exhibit B-1-b-1-b:	MFS Investment Management cover letter dated May 23, 2011 and May 19, 2011 letter from Christopher D. Frier, Vice President, Global Investment Support with proof of claim forms;
Exhibit B-1-b-1-c:	Affidavit of Christopher D. Frier, dated August 12, 2011;
Exhibit B-1-b-2-a:	Invesco cover letter dated May 23, 2011 with master proof of claim form;
Exhibit B-1-b-2-b:	Declaration of Peter A. Davidson of Invesco, dated November 3, 2011;
Exhibit B-1-b-3-a:	Timber Hill LLC cover letter dated May 11, 2011 with proof of claim form;
Exhibit B-1-b-3-b:	Declaration of Timber Hill LLC, dated November 1, 2011;
Exhibit B-1-b-4-a:	Chart of Principal Financial Group's Claims Challenged by Defendants;
Exhibit B-1-b-4-b:	Principal Funds cover letter dated April 13, 2011 with master proof of claim form;
Exhibit B-1-b-4-c:	Declaration of Layne A. Rasmussen of Principal Funds, dated November 9, 2011;
Exhibit B-1-b-5-a:	Chart of JP Morgan Clearing Corporation Claims Challenged by Defendants;
Exhibit B-1-b-5-b:	JP Morgan Clearing Corporation cover letter dated April 28, 2011 with master proof of claim form;
Exhibit B-1-b-5-c:	Declaration of Nimeh Barakat of JP Morgan Clearing Corporation, dated November 10, 2011;
Exhibit B-1-b-6-a:	Chart of ING's Claims Challenged by Defendants;
Exhibit B-1-b-6-b:	ING Investment Management cover letter dated May 19, 2011 with master proof of claim form;
Exhibit B-1-b-6-c:	Declaration of Susan L. Syme of ING Investment Management, dated November 30, 2011;
Exhibit B-1-b-7-a:	Declaration of Hal Levine of JPMorgan Securities LLC, dated March 20, 2012;
Exhibit B-1-b-8-a:	Affidavit of Bhavesh Soni of Morgan Stanley, dated August 19, 2011;
Exhibit B-1-c-1-a:	Goldman Sachs Execution & Clearing cover letter dated June 7, 2011 with master proof of claim form and written consent form;
Exhibit B-1-c-2-a	Chart of BNP Paribas' Claims Challenged by Defendants;

Exhibit B-1-c-2-b:	BNP Paribas Securities Corp. cover letter dated March 8, 2011 with proof of claim form;
Exhibit B-1-c-3-a:	Davis Selected Advisers, L.P. cover letter dated May 23, 2011 with master proof of claim form;
Exhibit B-1-d-1	Chart of Class Members that Provided Proof of Claim Forms;
Exhibit B-1-d-2:	Susquehanna Investment Group's proof of claim forms;
Exhibit B-2-a-1-a:	Declaration of American Century Investments, dated November 9, 2011;
Exhibit B-2-a-1-b:	Declaration of Laurie C. Harrigan, dated October 28, 2011;
Exhibit B-2-a-1-c	Declaration of Paul M. Donahue of John Hancock Funds, dated November 9, 2011;
Exhibit B-2-a-1-d:	Declaration of Pioneer Investments, dated November 2, 2011;
Exhibit B-2-a-1-e:	Declaration of Russell Investments, dated November 3, 2011;
Exhibit B-2-a-1-f:	Declaration of BlackRock, dated October 28, 2011;
Exhibit B-2-a-1-g:	Declaration of Elliott Associates, L.P., dated November 3, 2011;
Exhibit B-2-a-1-h	Declaration of Standard Life Investment Funds, dated November 16, 2011;
Exhibit B-2-a-1-i:	Declaration of William Blair & Company, L.L.C., dated October 31, 2011;
Exhibit B-2-a-1-j:	Declaration of Millennium Partners LP, dated October 28, 2011;
Exhibit B-2-a-1-k:	Declaration of Thrivent Financial for Lutherans, dated October 31, 2011;
Exhibit B-2-a-1-l:	Declaration of Citadel LLC, dated October 27, 2011;
Exhibit B-2-a-1-m:	Declaration of Fifth Third Bank, dated October 31, 2011;
Exhibit B-2-a-1-n:	Declaration of Kerrill O'Mahony of Moore Capital Management, LP, Ltd, dated November 2, 2011;
Exhibit B-2-a-1-o-1:	Chart of Ruane, Cunniff & Goldfarb's 219 Claims Challenged by Defendants;
Exhibit B-2-a-1-o-2:	Declaration of Ruane, Cunniff & Goldfarb, Inc., dated October 31, 2011;
Exhibit B-2-a-1-p:	Declaration of O'Connor Global Multi-Strategy Alpha Master Limited, dated November 9, 2011;
Exhibit B-2-a-1-q:	Certification of Catherine Sullivan of Northern Trust Investments, Inc.;
Exhibit B-2-a-1-r-1:	RiskMetrics' Claims Challenged by Defendants;
Exhibit B-2-a-1-r-2:	RiskMetrics cover letter dated April 5, 2011;
Exhibit B-2-a-2-a:	RiskMetrics / Merrill Lynch Broadridge cover letter dated May 24, 2011 with proof of claim form;
Exhibit B-2-a-2-b:	Declaration of Robert B. Kroner, Jr., dated November 3, 2011;
Exhibit B-2-a-2-c:	Chart of Merrill Lynch Broadridge Claims Challenged by Defendants;
Exhibit B-2-a-3-a:	RiskMetrics / SunAmerica cover letter dated April 13, 2011 with proof of claim form;
Exhibit B-2-a-3-b:	Chart of SunAmerica's Claims Challenged by Defendants;
Exhibit B-2-a-4:	ING letters dated November 30, 2010; RiskMetrics / ING cover letter dated April 6, 2011 with proof of claim form;
Exhibit B-2-a-5:	PGGM letter dated May 11, 2011; RiskMetrics /PGGM cover letter dated September 13, 2011 with proof of claim form;
Exhibit B-2-a-6:	Declaration of The Public School Retirement System of Missouri, dated November 2, 2011;
Exhibit B-2-a-7-a:	Chart of Ruane, Cunniff & Goldfarb's 54 Claims Challenged by Defendants;
Exhibit B-2-a-7-b:	Declaration of Ruane, Cunniff & Goldfarb, Inc., dated October 31, 2011;
Exhibit B-2-a-8:	RiskMetrics / National Australia Bank cover letter dated May 25, 2011 with proof of claim form and November 7, 2005 authorization letter;

Exhibit B-2-a-9:	RiskMetrics / Prudential Financial cover letter dated May 24, 2011 with proof of claim form and November 10, 2009 authorization letter;
Exhibit B-2-a-10:	RiskMetrics / Pioneer Munich cover letter dated April 26, 2011 with proof of claim form and April 20, 2011 authorization letter;
Exhibit B-2-a-11-a:	RiskMetrics / Loomis Sayles cover letter dated May 23, 2011 with proof of claim form and April 15, 2005 authorization letter;
Exhibit B-2-a-11-b:	Declaration of Loomis, Sayles & Company, dated November 4, 2011;
Exhibit B-2-a-12-a:	RiskMetrics /William Blair cover letter dated May 3, 2011 with proof of claim form and March 31, 2011 authorization letter;
Exhibit B-2-a-12-b:	Declaration of William Blair & Company, L.L.C., dated October 31, 2011;
Exhibit B-2-b:	Affidavit of James C. Tharin in Support of Claims Submitted by Chicago Clearing Corporation, dated October 31, 2011;
Exhibit B-2-c-1:	Class Action Services, LLC cover letter dated February 9, 2011 with proof of claim form;
Exhibit B-2-c-2:	Class Action Services, LLC Service Agreements;
Exhibit B-2-d:	Sturman LLC cover letter dated May 24, 2011 with proof of claim forms;
Exhibit B-2-e:	Declaration of Norman S. Jung of Claims Compensation Bureau, LLC, dated November 8, 2011;
Exhibit B-2-f:	First International Claims Filing cover letter dated May 6, 2011 with proof of claim forms;
Exhibit B-2-g-1:	Financial Recovery Technologies cover letter dated October 4, 2011 with proof of claim form and certificate of authority and authorization to file claims;
Exhibit B-2-g-2:	Financial Recovery Technologies cover letter dated May 18, 2011 with proof of claim form and Declaration of Jeff Feinberg of JLF Asset Management dated November 7, 2011;
Exhibit B-2-h-1:	Class Action Claims Management, LLC cover letters with proof of claim forms;
Exhibit B-2-h-2:	Declaration of Class Action Claims Management, dated November 18, 2011;
Exhibit B-2-i:	Declaration of Stephen M. Everard of Goal Global Recoveries Ltd, dated November 8, 2011;
Exhibit B-2-j:	Greenback Holdings, Inc. cover letters dated April 29, 2011 with proof of claim forms;
Exhibit B-2-k:	Grahm Capital Recovery Group, LLC cover letters, proof of claim forms and letters of authority;
Exhibit C-1:	Chart of Duplicate Claims;
Exhibit C-2:	Chart of Claims with No Activity During the Damages Period;
Exhibit D-2:	Chart of Claims Answering the Reliance Question, Filed by the Beneficiaries Themselves;
Exhibit D-3:	Chart of 4 Claimants that Answered "No"; and 41 Claimants that Provided an Explanation for the Reliance Question with Claim Amounts Greater than \$250,000 Filed by Third-Party Filers;
Exhibit E-1:	Declaration of Alexander Reus in Support of Claims Filed on Behalf of UBS Fund Management (Switzerland) AG, dated March 26, 2012;
Exhibit E-2:	Declaration of Seven Prudential Funds in Support of Supplemental Claim Forms Filed November 2011, dated March 21, 2012;

Exhibit E-3:	Supplemental form submitted by LaFarge UK Pension Plan-Wellington, dated and postmarked September 8, 2011;
Exhibit E-4:	Supplemental form submitted by WITCO-Smith Barney, dated September 9, 2011;
Exhibit E-5:	CCC Claims Objected To by Defendants in E.1.;
Exhibit F:	Relevant excerpts from the deposition transcript of Mike Majure taken on May 17, 2011;
Exhibit G:	Relevant excerpts from the deposition transcript of Arthur Pelissier taken on May 24, 2011;
Exhibit H:	Relevant excerpts from the deposition transcript of Tommy Plymale taken on May 10, 2011;
Exhibit I:	Relevant excerpts from the deposition transcript of Martin A. Romo taken on May 19, 2011;
Exhibit J:	Relevant excerpts from the deposition transcript of Ho Hin Wah taken on May 19, 2011; and
Exhibit K:	Declaration of Lara McDermott re Defendants' Objections, dated March 27, 2012.

DATED: March 28, 2012

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Attorneys for Plaintiff

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 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on March 28, 2012, declarant served by electronic mail to the parties listed below, the following documents:

**APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' OBJECTIONS TO CERTAIN CLAIMS INCLUDED IN THE REPORT OF CLAIMS ADMINISTRATOR GILARDI & CO. LLC**

The parties' e-mail addresses are as follows:

TKavaler@cahill.com PSloane@cahill.com PFarren@cahill.com LBest@cahill.com DOwen@cahill.com JHall@cahill.com	Mrakoczy@skadden.com Rstoll@skadden.com Ldegrand@degrandwolfe.com TWolfe@degrandwolfe.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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3. That Declarant also served by overnight mail the Exhibits to the **APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' OBJECTIONS TO CERTAIN CLAIMS INCLUDED IN THE REPORT OF CLAIMS ADMINISTRATOR GILARDI & CO. LLC** on CD-ROM to the following parties:

Thomas J. Kavaler Howard G. Sloan Patricia Farren Landis Best David Owen Jason Hall CAHILL GORDON & REINDEL LLP 80 Pine Street New York, NY 10005	Mark E. Rakoczy R. Ryan Stoll SKADDEN ARPS SLATE MEAGHER & FLOM 155 North Wacker Drive Chicago, Il 60606
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Luke DeGrand Tracy L. Wolfe DEGRAND & WOLFE, P.C. 20 South Clark Street, Ste 2620 Chicago, Il 60603	
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I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of March, 2012, at San Diego, California.



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DEBORAH S. GRANGER

ALL EXHIBITS HERETO  
Are Restricted Documents  
Pursuant to L.R. 26.2 Filed  
Under Seal Pursuant to  
Protective Order Dated  
November 5, 2004 and the  
Minute Order Dated  
October 10, 2006 (Docket 704)