

**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, )	
Plaintiff, )	Judge Ronald A. Guzman
vs. )	
HOUSEHOLD INTERNATIONAL, INC., et )	
al., )	
Defendants. )	
_____ )	

**DECLARATION OF MARVIN A. MILLER FILED ON BEHALF OF  
MILLER LAW LLC IN SUPPORT OF APPLICATION FOR AWARD OF  
ATTORNEYS' FEES AND EXPENSES**

I, Marvin A. Miller, declare as follows:

1. I am a member of the firm of Miller Law LLC. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. This firm is counsel of record for plaintiff Lawrence E. Jaffe Pension Plan.

3. The identification and background of my firm and its partners is attached hereto as Exhibit A.

4. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts prepared and maintained by the firm in the ordinary course of business. I oversaw and/or conducted the day-to-day activities in the litigation and reviewed these printouts (and backup documentation where necessary or appropriate). The purpose of these reviews was to confirm both the accuracy of the entries on the printouts as well as the necessity for and reasonableness of the time and expenses committed to the litigation. I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace. Beginning January 1, 2007 through November 30, 2013, the total number of hours spent on this litigation by my firm is 1911.4. The total lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$1,072,161.00. The hourly rates shown below are the usual and customary rates set by the firm for each individual. A breakdown of the lodestar is as follows:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Marvin A. Miller	(P)	438.0	\$815	\$356,970.00
Lori A. Fanning	(P)	993.0	600	595,800.00

Kathleen Boychuck	(A)	45.8	350	16,030.00
Anne Skallerup	(A)	63.5	350	22,225.00
Grant Manny	(A)	4.0	190	760.00
Kira Thomas	(A)	8.0	190	1,520.00
Anne Jewell	(PL)	18.8	250	4,700.00
Jorge Ramirez	(PL)	269.3	220	59,246.00
Kay Pulido	(PL)	71.0	210	14,910.00
<b>TOTAL:</b>		<b>1,911.40</b>		<b>\$1,072,161.00</b>

(P) Partner

(A) Associate

(PL) Paralegal

5. My firm seeks an award of \$22,404.36 in expenses/charges in connection with the prosecution of the litigation. They are broken down as follows:

***EXPENSES/CHARGES***

From Inception through November 2013

<b><i>CATEGORY</i></b>	<b><i>TOTAL</i></b>
Meals, Hotels & Transportation	\$1,399.14
Photocopies	10,453.25
Postage	60.57
Telephone, Facsimile	230.75
Messenger, Overnight Delivery	364.71
Court Hearing and Deposition Reporting, and Transcripts	4,342.89
Online Legal and Financial Research	5,553.05
<b><i>TOTAL</i></b>	<b><i>\$22,404.36</i></b>

6. The following is additional information regarding certain of these expenses:

(a) Meals, Hotels and Transportation: \$1,399.14. This was for cab fares to and from the courthouse to drop off boxes; cab fares for employees working late and lunch and dinner for attorneys working late during overtime and meals during the trial.

- (b) Photocopying:  
 In-house (39,937 copies @ \$0.25 per copy): \$9,984.25  
 In-house Imaging/Scanning/Printing: \$-0-  
 Outside Copying: \$469.00

<i><b>DATE</b></i>	<i><b>VENDOR</b></i>	<i><b>DESCRIPTION</b></i>
1/10/2007	Document Technologies	Copying exhibits, binding and exhibit tabs
2/17/2009	Landmark	951 copies, binding and exhibit tabs
3/5/2009	Landmark	1266 copies, binding and exhibit tabs

- (c) Court Hearing and Deposition Reporting, and Transcripts: \$4,342.89

<i><b>DATE</b></i>	<i><b>VENDOR</b></i>	<i><b>DESCRIPTION</b></i>
1/17/2007	Geraldine D. Monahan CSR	1/10/2007 hearing transcript
1/23/2007	Pamela Warren	4/12/2007 hearing transcript
2/21/2007	Riki Schatell	2/12/07 hearing transcript
1/27/2007	April Metzler	1/24/2007 status conference transcript
2/27/2007	Geraldine Monahan	2/15/2007 hearing transcript
3/9/2007	Riki Schatell	2/27/2007 hearing transcript
3/27/2007	Pamela Warren	3/12/2007 hearing transcript
5/7/2007	Riki Schatell	4/22/2008 hearing transcript
9/6/2007	Nancy LaBella	9/4/2007 hearing transcript
11/26/2007	Riki Schatell	11/20/2007 hearing transcript
3/28/2008	Riki Schatell	3/13/2008 hearing transcript
4/7/2008	Nancy LaBella	3/27/2008 hearing transcript
4/30/2008	Riki Schatell	4/29/2008 hearing transcript
5/19/2008	Riki Schatell	4/22/2008 hearing transcript
5/19/2008	Riki Schatell	4/29/2008 hearing transcript
12/8/2008	Nancy LaBella	12/2/2008 hearing transcript
12/17/2008	Nancy LaBella	12/16/2008 hearing transcript
1/6/2011	Nancy LaBella	1/5/2011 hearing transcript
1/7/2011	Nancy LaBella	8/20/2009 hearing transcript
1/28/2011	Nancy LaBella	1/27/2011 hearing transcript
4/11/2011	Nancy LaBella	4/7/2011 hearing transcript

- (d) Online Legal and Financial Research: \$5,553.05. This was for the West Publishing research database and PACER Service Center charges. These databases were used to obtain access to SEC filings, legal research and cite-checking of briefs.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of December, 2013 at Chicago, Illinois.

*s/Marvin A. Miller*  
\_\_\_\_\_  
MARVIN A. MILLER

**DECLARATION OF SERVICE BY ELECTRONIC 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 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on December 31, 2013, declarant caused to be served by electronic mail to the parties the following document:

DECLARATION OF MARVIN A. MILLER FILED ON BEHALF OF MILLER LAW  
LLC IN SUPPORT OF APPLICATION FOR AWARD OF ATTORNEYS' FEES  
AND EXPENSES

The parties' e-mail addresses are as follows:

Tkavaler@cahill.com	Zhudson@bancroftpllc.com
Pfaren@cahill.com	Mrakoczy@skadden.com
Dowen@cahill.com	Rstoll@skadden.com
Jhall@cahill.com	Mmiller@MillerLawLLC.com
Pclement@bancroftpllc.com	Lfanning@MillerLawLLC.com

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of December, 2013, at San Diego, California.

s/ TERESA HOLINDRAKE  
\_\_\_\_\_  
TERESA HOLINDRAKE