UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, On Behalf of Itself and All Others Similarly Situated, Plaintiff, vs. HOUSEHOLD INTERNATIONAL, INC., et al., Defendants.	Lead Case No. 02-C-5893 (Consolidated) CLASS ACTION Honorable Jorge L. Alonso

MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT

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I. INTRODUCTION

Class Representatives Glickenhaus & Co. ("Glickenhaus"), PACE Industry Union-Management Pension Fund ("PACE") and International Union of Operating Engineers Local No. 132 Pension Plan ("IUOE") (collectively, "Plaintiffs") submit this memorandum in support of preliminary approval of the parties' Stipulation of Settlement dated as of June 17, 2016 (the "Stipulation"), filed contemporaneously herewith.[1] After more than 14 years of litigation, the parties have reached an agreement to settle Plaintiffs' and the Class's claims. The settlement provides for the payment of $1,575,000,000 for the benefit of the Class. This settlement is the largest securities class action settlement ever achieved in the Seventh Circuit.

The settlement is the result of well-informed and extensive arm's-length negotiations between and among highly experienced counsel, facilitated by the respected mediator, the Honorable Layn R. Phillips (Ret.). Plaintiffs respectfully submit that the proposed settlement is fair, reasonable and adequate, and therefore ask the Court to enter the accompanying Order Preliminarily Approving Settlement and Providing for Notice ("Notice Order"). The Notice Order will (1) preliminarily approve the terms of the settlement as set forth in the Stipulation; (2) approve the form and method for providing notice of the settlement to the Class; and (3) schedule a settlement hearing at which the Court will consider the request for final approval of (a) the settlement set forth in the Stipulation, (b) the Plan of Allocation of settlement proceeds among Class Members, and (c) Lead Counsel's application for an award of attorneys' fees and expenses and Plaintiffs' application for expenses incurred in representing the Class.

II. SUMMARY OF THE LITIGATION

On August 19, 2002, Lawrence E. Jaffe Pension Plan initiated an action in the United States District Court for the Northern District of Illinois, Eastern Division, by complaint styled as *Lawrence E. Jaffe Pension Plan v. Household International, Inc. et al.*, Lead Case No. 02-C-5893, alleging violations of the federal securities laws and naming as defendants Household, Chief Executive Officer William F. Aldinger, Chief Financial Officer David A. Schoenholz and outside

[1] All capitalized terms that are not defined herein have the same meanings as set forth in the Stipulation.

auditor Arthur Andersen (the "Jaffe Complaint"). Dkt. No. 1. The Jaffe Complaint brought claims on behalf of all persons who purchased Household securities between October 23, 1997 and August 14, 2002. Thereafter, a number of similar, related, class action complaints were filed. In all, a total of 7 actions involving similar claims were filed. On December 9, 2002, these cases were consolidated by Court order. Dkt. No. 33. On December 18, 2002, the Court entered an order granting the Glickenhaus Institutional Group's motion for appointment as Lead Plaintiffs. Dkt. No. 38. Robbins Geller was appointed as lead counsel, and Miller Law as liaison counsel.

On March 13, 2003, Plaintiffs filed the Consolidated Complaint which included claims for violations of §§10(b) and 20(a) of the Securities Exchange Act of 1934 and Rule 10b-5 promulgated thereunder and §§11, 12(a)(2) and 15 of the Securities Act of 1933, which added defendant Gary Gilmer. Dkt. No. 54. The Consolidated Complaint asserted claims on behalf of all persons who purchased or otherwise acquired securities of Household during the period from October 23, 1997 to October 11, 2002. On May 13, 2003, Defendants moved to dismiss the complaint. On March 19, 2004, the Court entered an Order granting in part and denying in part Defendants' motions to dismiss the Consolidated Complaint. Dkt. No. 135.

By order entered December 3, 2004, the Court certified a class (the "Class") with the Class defined as follows: all persons who purchased or otherwise acquired the securities of Household during the period between October 23, 1997 and October 11, 2002. Dkt. No. 194.

On June 30, 2005, the Household Defendants filed a motion to dismiss pursuant to the Seventh Circuit's decision in *Foss v. Bear, Sterns Co.*, 394 F.3d 540 (7th Cir. 2005). Dkt. No. 243. On February 28, 2006, following briefing on Defendants' motion, the Court granted Defendants' motion, dismissing Plaintiffs' §10(b) claims that arose prior to July 30, 1999. Dkt. No. 434.

On August 16, 2005, the parties filed a Joint Motion and [Proposed] Order for Entry of Modification to Stipulation and Order Regarding Class Action Certification Entered December 3, 2004. Dkt. No. 277. Under the terms of the modified stipulation, the parties agreed that Defendants would waive their right to decertify in part the Class as set forth in the stipulation. The parties also requested that the Court direct that notice be sent to the Class. On August 22, 2005, the Court

entered an order approving the parties' modification to the stipulation and order regarding class certification. Dkt. No. 287.

On June 16, 2005, Plaintiffs and Arthur Andersen reached a settlement, pursuant to which Arthur Andersen agreed to pay cash consideration of $1,500,000. On January 31, 2006, a notice was sent to Class Members informing them of the Arthur Andersen settlement, of the certification of the Class, and notifying Class Members of the right to be excluded from the Litigation. On March 30, 2006, Plaintiffs filed a motion for final approval of the settlement with Arthur Andersen. Dkt. No. 452. On April 6, 2006, the Court approved the settlement, entering final judgment and an order of dismissal with prejudice as to Arthur Andersen. Dkt. No. 485.

A six (6) week jury trial of the Litigation commenced on March 30, 2009 against Defendants Household, Aldinger, Schoenholz and Gilmer on behalf of all purchasers of Household stock from July 30, 1999 through October 11, 2002. On May 7, 2009, the jury rendered a verdict in the case. The jury found that the Trial Defendants did not violate the federal securities laws for statements made during the time period of July 30, 1999 through March 22, 2001. Plaintiffs did not appeal this determination. For Class Members who purchased Household common stock during that time frame, as well as those who purchased between October 23, 1997 and July 30, 1999, there is no recovery. The jury found that the Trial Defendants did violate the federal securities laws for 17 public statements regarding Household made in connection with purchases of Household common stock from March 23, 2001 through October 11, 2002, inclusive. The jury also awarded per share damages for each trading day during this period.

On November 22, 2010, the Court entered an Order creating the protocol for Phase II of this case. Dkt. No. 1703. On January 10, 2011, the Court approved a Notice of Verdict to be sent to all persons who purchased or otherwise acquired the common stock of Household between October 23, 1997 and October 11, 2002, inclusive. In light of the Court's rulings and the jury's verdict, only persons who purchased or otherwise acquired Household common stock between March 23, 2001 and October 11, 2002 were entitled to a recovery. After the submission of claims and the claims administration process was completed, the claims administrator filed reports with the Court on December 22, 2011 identifying potentially valid claims and claims that were rejected. Thereafter,

the Court allowed defendants to object to any potentially valid claims. Defendants' objections were filed on February 27, 2012, and Plaintiffs responded to these objections on March 28, 2012. The Court also required all class members to answer the "reliance question," which was set forth on page five (5) of the Proof of Claim Form. Persons who failed to answer the reliance question, either in 2011 as part of the claims process or, thereafter, during a second opportunity provided by the Court in 2013, had their claims rejected.

On October 17, 2013, the Court entered final judgment pursuant to Fed. R. Civ. P. 54(b) in the amount of $1,476,490,844.21 plus prejudgment interest in the amount of $986,408,772.00, for a total amount of $2,462,899,616.21, along with post-judgment interest and taxable costs. Dkt. No. 1898.

Defendants filed a notice of appeal on October 17, 2013. The appeal was fully briefed on April 11, 2014. On appeal, defendants raised issues with respect to three elements: loss causation, the Court's instruction on what it means to "make" a false statement, and reliance. On May 21, 2015, the Court of Appeals reversed the judgment and remanded the case for a new trial on three issues: (1) loss causation; (2) damages; and (3) whether the three Individual Defendants "made" certain statements under the Supreme Court's decision in *Janus Capital Group, Inc. v. First Derivative Traders*, 564 U.S. 135 (2011). In addition, the Court of Appeals held that the new jury would need to reapportion liability in light of the *Janus* issue described above. A new trial was scheduled to begin on June 6, 2016, before the Honorable Jorge L. Alonso.

The parties have engaged in mediation sessions in May 2005, May 2008, June 2011, June 2014; before this Court on August 22, 2005; and in the Seventh Circuit's mediation program in December 2013 and January 2014. At various times during the course of the Litigation, the parties engaged the services of Judge Layn R. Phillips (Ret.), a nationally recognized mediator. The parties engaged in numerous telephonic mediation sessions with Judge Phillips during 2016 regarding a potential settlement of the Litigation. On June 5, 2016, Judge Phillips issued a mediator's proposal to settle the Litigation for $1,575,000,000.00. The parties tentatively accepted Judge Phillips' mediator's proposal to settle the Litigation for that amount on June 6 subject to the negotiation of the terms of a Stipulation of Settlement and approval by the Court.

III. TERMS OF THE SETTLEMENT

The settlement set forth in the Stipulation resolves the claims of the Class against all Defendants. Plaintiffs and their counsel have diligently litigated this action and, after arm's-length negotiations, have reached an agreement to settle this Litigation for $1,575,000,000 in cash. Plaintiffs and their counsel have concluded, after a thorough investigation of the factual and legal issues in the Litigation, as well as consideration of the expense and risks of continued litigation, that the substantial and certain monetary recovery obtained for the benefit of the Class is an excellent result and is in the best interests of Members of the Class.

IV. THE PROPOSED SETTLEMENT WARRANTS PRELIMINARY APPROVAL

A. The Proposed Settlement Meets the Standard for Preliminary Approval

Settlement is a strongly favored method for resolving litigation. *Isby v. Bayh*, 75 F.3d 1191, 1196 (7th Cir. 1996). This is especially true in complex class actions such as this:

> In the class action context in particular, "there is an overriding public interest in favor of settlement." Settlement of the complex disputes often involved in class actions minimizes the litigation expenses of both parties and also reduces the strain such litigation imposes upon already scarce judicial resources.

Armstrong v. Bd. of Sch. Dirs., 616 F.2d 305, 313 (7th Cir. 1980) (citation omitted).

Federal Rule of Civil Procedure 23(e) requires judicial approval for the compromise of claims brought on a class basis. Approval of a class action settlement under Rule 23(e) involves a two-step process: first, a "preliminary approval" order; and second, after notice of the proposed settlement has been provided to the class and a hearing has been held to consider the fairness, reasonableness, and adequacy of the proposed settlement, a "final approval" order or judgment. *See Manual for Complex Litigation* §13.14 (4th ed. 2004). At the final approval hearing, the Court will have before it more detailed papers submitted in support of final approval of the proposed settlement and only then will it be asked to make a final determination as to whether the settlement is fair, reasonable, and adequate under all the circumstances. At this time, Plaintiffs request only that the Court grant preliminary approval of the settlement.

In determining whether preliminary approval is warranted, the sole issue before the Court is whether the proposed settlement is within the range of what might be found fair, reasonable, and adequate, so that notice of the proposed settlement should be given to Class Members and a hearing scheduled to consider final settlement approval. *Manual for Complex Litigation, supra*, §13.14, at 173 ("First, the judge reviews the proposal preliminarily to determine whether it is sufficient to warrant public notice and a hearing. If so, the final decision on approval is made after the hearing.").

The proposed settlement clearly satisfies the standard for approval. The settlement provides an immediate and substantial cash benefit to the Class, providing the sum of $1,575,000,000 for distribution to eligible Class Members. It was the product of zealous, arm's-length negotiations with the assistance of an experienced mediator. Both Plaintiffs and Defendants were fully prepared to try the case for a second time rather than settle the Litigation for a sum each party deemed unreasonable. Indeed, the proposed settlement was only reached after aggressive negotiations and acceptance of Judge Phillip's mediator's proposal, supporting a finding that the settlement is fair. *See Wong v. Accretive Health, Inc.*, 773 F.3d 859, 864 (7th Cir. 2014). Given the complexities of the Litigation and the substantial risks and uncertainties of continued litigation, Lead Counsel believe the settlement represents a very good resolution of the Litigation and eliminates the risk that the Class might not otherwise recover if the Litigation were to continue.

B. The Factors Considered When Granting Final Approval Also Support Preliminary Approval of the Proposed Settlement

When granting final approval of a settlement, courts in the Seventh Circuit consider: "(1) the strength of plaintiffs' case compared to the terms of the proposed settlement; (2) the likely complexity, length and expense of continued litigation; (3) the amount of opposition to settlement among affected parties; (4) the opinion of competent counsel; and (5) the stage of the proceedings and the amount of discovery completed." *In re AT&T Mobility Wireless Data Servs. Sales Litig.*, 270 F.R.D. 330, 346 (N.D. Ill. 2010) (citations omitted). "At the preliminary approval stage, however, the court's task is merely to 'determine whether the proposed settlement is within the range of possible approval,' not to conduct a full-fledged inquiry into whether the settlement meets Rule 23(e)'s standards." *Am. Int'l Grp., Inc. v. ACE INA Holdings, Inc.*, No. 07 C 2898, 2011 WL

3290302, at *6 (N.D. Ill. July 26, 2011) (citation omitted). A "summary" review of this criteria demonstrates that the proposed settlement is clearly "'within the range of possible approval."' *See id*. (citation omitted).

The proposed $1,575,000,000 settlement falls well within the range of approval, representing the largest securities class action recovery ever achieved in the Seventh Circuit. *See* Securities Class Action Services, *The SCAS 100 for Q2 2010*, at 2-4 (MSCI 2010). This sum is extraordinary whether viewed in isolation or considered along with the risks that Plaintiffs and the Class would face if the parties proceeded to a second trial.

Although Plaintiffs believe that their claims have substantial merit, Lead Counsel recognize the significant risks inherent in prosecuting Plaintiffs' claims against Defendants through another trial and more appeals, as well as the inherent difficulties and delays complex litigation like this entails. Lead Counsel are also mindful of the many problems of proof under and possible defenses to the securities law violations alleged. Having completed fact and expert discovery, and proceeded through summary judgment, trial preparation, trial, appeal, expert discovery and preparation for a second trial, Plaintiffs, through their counsel, were able to thoroughly evaluate their claims and assess the risks of continued litigation. To this day, Defendants adamantly deny any wrongdoing. They have denied liability and asserted defenses that might have found favor with the trier of fact. For example, Defendants would present expert testimony and other evidence at trial that the false and misleading statements made about predatory lending, re-aging and the restatement did not cause Plaintiffs' losses or that the models relied upon by Plaintiffs' expert failed to adequately account for non-fraud disclosures. If the jury agreed with Defendants, Plaintiffs' claims would fail and the Class would not recover. While Plaintiffs believe that they would prevail on their claims, even if they were successful at trial risks would still remain, including the risk that damages awarded by the jury could be either less than Plaintiffs sought through the quantification including leakage, by adopting the specific disclosure model, or by adopting damages models proposed by Defendants, which would dramatically decrease Plaintiffs' damages. Ultimately, there is no guarantee of success and the settlement provides a very good recovery for the Class while eliminating the risk, expense, and uncertainty of continued litigation.

Plaintiffs, through their counsel, having carefully considered and evaluated, *inter alia*, the relevant legal authorities and evidence to support the claims asserted, the likelihood of prevailing on these claims, the risk, expense and duration of continued litigation, and the likely appeals and subsequent proceedings necessary if Plaintiffs did prevail at the second trial, have concluded that the settlement is not only fair, reasonable, and adequate but a highly favorable resolution of this complex action. Lead Counsel have significant experience in securities and other complex class action litigation and have negotiated numerous other substantial class action settlements throughout the country. *See* www.rgrdlaw.com/firm.html. It is well established that significant weight should be attributed to the belief of experienced counsel that settlement is in the best interest of the class. *See Accretive*, 773 F.3d at 864 (noting as a relevant factor in affirming settlement approval that Lead Counsel Robbins Geller "are highly experienced"); *EEOC v. Hiram Walker & Sons, Inc.*, 768 F.2d 884, 889 (7th Cir. 1985); *Isby*, 75 F.3d at 1200 (the court placed significant weight on the opinion of plaintiffs' well-respected attorneys); *Great Neck Capital Appreciation Inv. P'ship, L.L.P. v. PricewaterhouseCoopers, L.L.P.*, 212 F.R.D. 400, 410 (E.D. Wis. 2002) ("opinion of competent counsel weighs in favor of approval of a settlement").

Barring settlement, this case would require the expenditure of substantial additional sums of money, with no guarantee that any additional benefit would be provided to the Class. If not for the settlement, this case would have continued to a second trial and, even if Plaintiffs did prevail, Defendants would undoubtedly appeal again, resulting in further delay and the risk of reversal. Conversely, the settlement confers a substantial and immediate benefit on the Class, and avoids the risks associated with obtaining a wholly speculative, but potentially larger, sum several years from now. The $1,575,000,000 settlement sum is fair, reasonable and adequate, and unquestionably falls "'within the range of possible approval,"' to warrant the preliminary approval sought here. *See Am. Int'l Grp.*, 2011 WL 3290302, at *6 (citation omitted).

While Plaintiffs believe the settlement merits final approval, the Court need not make that determination now. The Court is being asked to permit notice of the terms of the settlement to be sent to the Class and to schedule a hearing, pursuant to Federal Rule of Civil Procedure 23(e), to consider any expressed views by Class Members about the fairness of the settlement, the Plan of

Allocation, Lead Counsel's request for an award of fees and expenses, and Plaintiffs' expense application. *See* 5 James Wm. Moore, *Moore's Federal Practice* §23.162[3] (3d ed. 2013).

V. THE PROPOSED NOTICE PROGRAM IS APPROPRIATE

Under Federal Rule of Civil Procedure 23(e)(1), "[t]he court must direct notice in a reasonable manner to all class members who would be bound by the proposal" (*i.e.*, the proposed settlement). Here, the parties negotiated the form of the Notice of Proposed Settlement of Class Action (the "Notice"). The Claims Administrator will send the Notice to those Class Members who were previously identified during the process of the mailing of the Notice of Verdict in Favor of the Plaintiff Class, dated January 11, 2011. In addition, the Claims Administrator will send the Notice to entities which commonly hold securities in "street name" as nominees for the benefit of their customers who are the beneficial purchasers of the securities. The parties further propose to supplement the mailed Notice with a Summary Notice published in *Investor's Business Daily* and over *PR Newswire*. The Notice and Summary Notice are attached to the Stipulation as Exhibits A-1 and A-2.

In addition, Rule 23(h)(1) requires that "[n]otice of the motion [for attorneys' fees] must be served on all parties and, for motions by class counsel, directed to class members in a reasonable manner." Here, the Notice satisfies the requirements of Rule 23(h)(1), as it notifies Class Members that counsel for Plaintiffs will apply to the Court for attorneys' fees of 24.68% of the Settlement Fund and expenses not to exceed $38 million, to be paid from the Settlement Fund. *See* Exhibit A-1 to the Stipulation, at §IV.

Furthermore, in securities class actions, the PSLRA requires the notice of settlement to include: (1) "[t]he amount of the settlement proposed to be distributed to the parties to the action, determined in the aggregate and on an average per share basis"; (2) "[i]f the parties do not agree on the average amount of damages per share that would be recoverable if the plaintiff prevailed on each claim alleged under this chapter, a statement from each settling party concerning the issue or issues on which the parties disagree"; (3) "a statement indicating which parties or counsel intend to make . . . an application [for attorneys' fees or costs], the amount of fees and costs that will be sought (including the amount of such fees and costs determined on an average per share basis), and a brief

explanation supporting the fees and costs sought"; (4) "[t]he name, telephone number, and address of one or more representatives of counsel for the plaintiff class who will be reasonably available to answer questions from class members"; and (5) "[a] brief statement explaining the reasons why the parties are proposing the settlement." 15 U.S.C. §78u-4(a)(7). The Notice includes all of the information required by the PSLRA, as well as additional relevant information.

The proposed form of notice describes the settlement and sets forth the Settlement Amount ($1,575,000,000) and the average distribution per damaged share represented by all valid claims (approximately $7.25/share); states the parties' disagreement over damages and liability; sets out the amount of attorneys' fees and expenses in the aggregate and on a per share basis (approximately $1.96/share) that Lead Counsel intend to seek in connection with final settlement approval; and describes the Plan of Allocation. In addition, the Notice briefly explains the nature, history and status of the Litigation; sets forth the definition of the Class; states the Class's claims and issues; discusses the rights of persons who fall within the definition of the Class; and summarizes the reasons the parties are proposing the settlement.

Finally, the Notice sets forth the date, time, and place of the Settlement Hearing, along with the procedures for commenting on the settlement, the Plan of Allocation or the application for Lead Counsel's fees and expenses and Plaintiffs' expenses, and includes the postal address for the Court, Lead Counsel, and counsel for Defendants.

The contents of the Notice and Summary Notice satisfy all applicable requirements of both the Federal Rules of Civil Procedure and the PSLRA. Accordingly, in granting preliminary approval of the settlement, Plaintiffs respectfully request that the Court also approve the parties' proposed form and method of giving notice to the Class.

VI. PROPOSED SCHEDULE OF EVENTS

In connection with preliminary approval of the settlement, the Court must set a Settlement Hearing date, dates for mailing the Notice and publication of the Summary Notice, and deadlines for: (i) objecting to the settlement, the Plan of Allocation of settlement proceeds, or Lead Counsel's application for attorneys' fees and expenses and Plaintiffs' application for expenses; and (ii) filing

papers in support of the settlement, Plan of Allocation of settlement proceeds, and fee and expense application. Plaintiffs propose the following schedule:

Event	Proposed Schedule	Assuming the Notice Order Is Entered June 23, 2016
Notice mailed to Class ("Notice Date")	10 business days after entry of the Notice Order	July 8, 2016
Summary Notice published	No later than 14 calendar days after the Notice Date	July 22, 2016
Deadline for filing initial papers in support of the settlement, Plan of Allocation of settlement proceeds, or request for an award of attorneys' fees and expenses and Plaintiffs' expenses	50 calendar days after the Notice Date	August 29, 2016
Deadline for objecting to the settlement, Plan of Allocation of settlement proceeds, or request for an award of attorneys' fees and expenses and Plaintiffs' expenses	65 calendar days after the Notice Date	September 12, 2016
Reply papers in support of the settlement, Plan of Allocation of settlement proceeds, or request for an award of attorneys' fees and expenses and Plaintiffs' expenses	7 calendar days prior to the Settlement Hearing	September 29, 2016
Settlement Hearing	90 calendar days after the Notice Date	October 6, 2016

VII. CONCLUSION

For all the foregoing reasons, the settlement warrants the Court's preliminary approval, and Lead Counsel respectfully request that the Court enter the Notice Order.

DATED: June 20, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for counsel of record denoted on the attached Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 20, 2016.

s/ Michael J. Dowd
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