

**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,)	
) Honorable Jorge L. Alonso
vs.)	
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
)

**DECLARATION OF MICHAEL JOAQUIN IN SUPPORT OF PLAINTIFFS' MOTION
FOR AN APPEAL BOND**

I, Michael Joaquin, declare:

1. I am a Senior Vice President for Gilardi & Co. LLC (“Gilardi”), located at 3301 Kerner Boulevard, San Rafael, California. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. Gilardi was appointed by the Court and engaged by Lead Counsel to provide settlement notification and claim distribution services in connection with the Settlement reached in the above-captioned matter.

3. Lead Counsel has requested that Gilardi estimate the additional fees and expenses resulting from the pending appeal and associated with the administration of the Settlement. Additional professional service fees and expenses will result primarily from the maintenance and operation of the Settlement call center, emails with counsel for the parties and with Class Members, and handling of mailed communications with Class Members during the pending appeal process. Additional case management and systems expenses will be incurred during the appeal period to update and maintain the Settlement website, the telephone system, and Post Office Box established for this matter, and for extended document storage and database maintenance. Lead Counsel has indicated that resolution of the appeal may take ten months or more. Absent the pending appeal, Gilardi would have been prepared to distribute the Net Settlement Fund twenty days after the Final Judgment and Order of Dismissal With Prejudice, dated November 10, 2016, became final. Therefore, the pending appeal appears likely to extend the administration by approximately ten months. Gilardi’s estimates are based on those assumptions. Should resolution of the appeal take more or less time, Gilardi’s estimates would vary accordingly.

4. Gilardi estimates that if the appeal period does extend the Settlement administration by ten months, the additional fees and expenses will be approximately \$30,000, depending on call and email volume during the pending appeal. Gilardi prepared this estimate based on our experience involving very large settlements as well as classes of this size, and the expenditures to date in this matter. In order to be as conservative as possible, we assumed that the rate of class member inquires

would continue at the levels experienced over the most recent several months, during which the number of such inquires has been relatively low when compared to other periods during the course of the litigation. Gilardi estimates that it will incur approximately \$25,000 in costs related to communications with Class Members and counsel, and approximately \$5,000 in case management and systems maintenance costs.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16th day of December, 2016, at San Rafael, California.

A handwritten signature in black ink, appearing to read "Michael Joaquin", written in a cursive style.

MICHAEL JOAQUIN

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 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 December 19, 2016.

s/ Luke O. Brooks
LUKE O. BROOKS

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