

**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,)	<u>CLASS ACTION</u>
vs.)	Judge Ronald A. Guzman
)	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
Defendants.)	
_____)	

**DECLARATION OF LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS’
REPLY ON MOTION TO COMPEL RESPONSES TO FIRST SET OF
INTERROGATORIES FROM HOUSEHOLD DEFENDANTS**

I, LUKE O. BROOKS, declare as follows:

I am an attorney duly licensed to practice before all of the courts of the State of California and I am also admitted to the General Bar for the United States District Court for the Northern District of Illinois. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiffs in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

1. Attached are true and correct copies of the following exhibits:

Exhibit 1: HHS 02127509-8208; and

Exhibit 2: Excerpts from the Answer of Defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar to [Corrected] Amended Consolidated Class Action Complaint evidencing affirmative defenses asserted.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 27th day of September, 2005, at San Francisco, California.

/s/ Luke O. Brooks

LUKE O. BROOKS

DECLARATION OF SERVICE BY UPS OVERNIGHT AND BY EMAIL

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 Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on September 27, 2005, declarant served by UPS Overnight (with exhibits) and by email (without exhibits) the: **DECLARATION OF LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS' REPLY ON MOTION TO COMPEL RESPONSES TO FIRST SET OF INTERROGATORIES FROM HOUSEHOLD DEFENDANTS** to the parties listed on the attached Service List. The parties' email addresses are as follows:

TKavaler@cahill.com
PSloane@cahill.com
LBest@cahill.com
NEimer@EimerStahl.com
ADeutsch@EimerStahl.com
sparzen@mayerbrownrowe.com
lnale@mayerbrown.com
scharles@mayerbrownrowe.com
mmiller@millerfaucher.com
lfanning@millerfaucher.com

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of September, 2005, at San Francisco, California.

/S/ Monina O. Gamboa

MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 9/27/2005 (02-0377)

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Counsel for Defendant(s)

Thomas J. Kavalier
Peter Sloane
Landis Best
Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005-1702
212/701-3000
212/269-5420(Fax)

Nathan P. Eimer
Adam B. Deutsch
Eimer Stahl Klevorn & Solberg LLP
224 South Michigan Avenue, Suite 1100
Chicago, IL 60604
312/660-7600
312/692-1718(Fax)

Lucia Nale
Stanley J. Parzen
Debra L. Bogo-Ernst
Mayer, Brown, Rowe & Maw LLP
71 South Wacker Drive
Chicago, IL 60606
312/782-0600
312/701-7711(Fax)

Counsel for Plaintiff(s)

Lawrence G. Soicher
Law Offices of Lawrence G. Soicher
305 Madison Avenue, 46th Floor
New York, NY 10165
212/883-8000
212/697-0877(Fax)

William S. Lerach
Lerach Coughlin Stoia Geller Rudman &
Robbins LLP
655 West Broadway, Suite 1900
San Diego, CA 92101
619/231-1058
619/231-7423(Fax)

Patrick J. Coughlin
Azra Z. Mehdi
Monique C. Winkler
Lerach Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111-5238
415/288-4545
415/288-4534(Fax)

Marvin A. Miller
Jennifer Winter Sprengel
Lori A. Fanning
Miller Faucher and Cafferty LLP
30 N. LaSalle Street, Suite 3200
Chicago, IL 60602
312/782-4880
312/782-4485(Fax)

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David R. Scott

Scott + Scott, LLC

108 Norwich Avenue

Colchester, CT 06415

860/537-5537

860/537-4432(Fax)