

**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.)	
_____)	

DECLARATION OF CAROLE K. SYLVESTER

I, CAROLE K. SYLVESTER, declare as follows:

1. I am employed by Gilardi & Co. LLC (“Gilardi”), located at 3301 Kerner Blvd., San Rafael, CA. My firm has been retained as Claims Administrator in this matter. Gilardi provides class action administration services and over the past 20 years has provided claims administration services in thousands of cases. The services that Gilardi provides include: completion of court-ordered class notice programs, including obtaining and compiling mailing lists of potential class members; address searches for returned and undeliverable mail; processing claims; calculation of claimant losses under court-approved distribution plans; and distribution of funds to class members.

2. Lead Counsel asked me to obtain the transfer records for purchasers of Household International Inc. (“Household”) securities between October 23, 1997 and October 11, 2002. I was provided with contact information for Craig Kesch of Cahill Gordon & Reindel LLP and was informed he was the person who would obtain the Household transfer records for me.

3. I initially attempted to contact Mr. Kesch on October 5, 2005. I left messages for Mr. Kesch on October 5, October 6 and October 11, 2005. Mr. Kesch called me on October 11th and told me he would look into the matter of obtaining records from the transfer agent. When I had received no information, I left messages for Mr. Kesch on October 23 and 27, 2005. Mr. Kesch left me a message on October 27th stating he was out of the office until October 31st.

4. On October 31, 2005 I spoke to Mr. Kesch who informed me that he needed Gilardi to sign a confidentiality letter before the transfer records could be sent to us. I received the proposed confidentiality letter from Mr. Kesch on November 22, 2005. For the Court’s convenience, a copy of the letter is attached as Exhibit A. The proposed confidentiality letter required Gilardi to destroy the new database of transfer records created for this case within three years of its creation. This does not work because distribution can be more than three years after creation of the database, especially where an appeal to the settlement is filed or in cases like this one where there is only a partial

settlement. On November 23rd, I sent Mr. Kesch a sample order signed by a court in another case where the court (in accordance with Gilardi's standard procedure) ordered Gilardi to destroy the database within three years after distribution of the settlement proceeds. On December 19, 2005, Rob Forrest of Gilardi and I spoke with Mr. Kesch to further explain the necessity of maintaining the database for three years from distribution of funds. A revised confidentiality letter was sent to me on December 22, 2005, which I signed on January 3, 2006 and is attached hereto as Exhibit B.

5. On January 3, 2006, I asked Mr. Kesch how soon I could expect to receive the transfer agent records. It is my understanding that Mr. Kesch contacted Computershare on January 3, 2006, and for the first time asked Computershare to pull together the transfer records. *See* email attached as Exhibit C hereto.

6. Subsequently, I was copied on a January 10, 2006 email where Lead Counsel informed Mr. Kesch that the Court ordered that class notices be mailed on January 24, 2006. On January 12, 2006, Mr. Kesch sent an email informing us that Computershare had technical, labor and personnel issues and would not likely be able to provide the transfer records by January 24, 2006. Mr. Kesch stated he would provide further information on January 17th. On January 18, 2006, Lead Counsel and Gilardi received an email from Mr. Kesch advising that Computershare would not meet the January 24, 2006 deadline and that we would be provided with a firm date later in the day. On January 19, 2006, we were informed that Computershare would send the records by January 27, 2006.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of January, 2006, at San Rafael, California.



CAROLE K. SYLVESTER

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2006, I electronically filed 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 denoted on the attached Electronic Mail Notice List, and I hereby certify that I have served the foregoing document or paper via overnight delivery to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ JOY ANN BULL

JOY ANN BULL

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Mailing Information for a Case 1:02-cv-05893

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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