

**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,

- against -

HOUSEHOLD INTERNATIONAL, INC., ET. AL.,

Defendants.

Lead Case No. 02-C-5893  
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman  
Magistrate Judge Nan R. Nolan

**DECLARATION OF JOSHUA M. GREENBLATT IN OPPOSITION TO CLASS'  
MOTION TO COMPEL RE RULE 30(B)(6) DEPOSITION ON HOUSEMAIL TOPIC**

I, JOSHUA M. GREENBLATT, declare as follows :

1. I am a member of the bar of the State of New York and an associate at the firm Cahill Gordon & Reindel LLP, attorneys for defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (the "Household Defendants") in this action. I have personal knowledge of the matters stated herein and, if called upon, could testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of the November 30, 2005 Order of Judge Nan R. Nolan.

3. Attached hereto as Exhibit B is a true and correct copy of portions of the October 26, 2005 Report of Proceedings Before the Honorable Magistrate Judge Nan R. Nolan.

4. Attached hereto as Exhibit C is a true and correct copy of the transcript from the December 2, 2005 deposition of Chris Cunningham.

5. Attached hereto as Exhibit D is a true and correct copy of the December 8, 2005 letter from D. Cameron Baker, counsel for lead Plaintiffs, to Peter Sloane, counsel for Household Defendants.

6. Attached hereto as Exhibit E is a true and correct copy of the December 12, 2005 letter from Peter Sloane to D. Cameron Baker.

7. Attached hereto as Exhibit F is a true and correct copy of the December 19, 2005 letter from D. Cameron Baker to Peter Sloane.

8. Attached hereto as Exhibit G is a true and correct copy of my December 21, 2005 letter to D. Cameron Baker.

9. Attached hereto as Exhibit H is a true and correct copy of D. Cameron Baker's December 21, 2005 letter to me.

10. On January 9, 2006, I spoke with D. Cameron Baker regarding a variety of Housemail discovery-related matters. During this conversation, I confirmed for Mr. Baker that Defendants would not provide an affidavit in advance of the deposition of Carol Werner because it would serve no useful purpose given Plaintiffs' insistence on deposing Ms. Werner rather than accepting Defendants' offer to provide information on the technical questions on which Ms. Cunningham deferred to Ms. Werner during her December 2, 2005 deposition.

11. Attached hereto as Exhibit I is a true and correct copy of D. Cameron Baker's January 9, 2006 letter to me.

12. Attached hereto as Exhibit J is a true and correct copy of my January 10, 2006 letter to D. Cameron Baker.

13. Attached hereto as Exhibit K is a true and correct copy of D. Cameron Baker's January 10, 2006 letter to me.

14. Attached hereto as Exhibit L is a true and correct copy of my January 13, 2006 letter to D. Cameron Baker.

15. Attached hereto as Exhibit M is a true and correct copy of D. Cameron Baker's January 13, 2006 letter to me.

16. Attached hereto as Exhibit N is a true and correct copy of my January 17, 2006 letter to D. Cameron Baker.

17. Attached hereto as Exhibit O is a true and correct copy of D. Cameron Baker's *first* January 17, 2006 letter to me.

18. Attached hereto as Exhibit P is a true and correct copy of D. Cameron Baker's *second* January 17, 2006 letter to me.

19. Attached hereto as Exhibit Q is a true and correct copy of my January 18, 2006 e-mail message to D. Cameron Baker.

20. Attached hereto as Exhibit R is a true and correct copy of D. Cameron Baker's January 18, 2006 e-mail message to me.

21. Following our e-mail exchange, I contacted D. Cameron Baker on January 18 to confirm that Defendants would respond to the language proposed in his second January 17 letter to me by the end of that week or sooner if possible. I explained to Mr. Baker that his demand that Defendants respond by 5 p.m. on January 18 was an arbitrary and counterproductive deadline. I told him that, given his demand that Defendants subscribe to the *new language* crafted by Plaintiffs and set forth in his second January 17 letter, I would need to consult with our client and could not guarantee a response by the deadline Mr. Baker sought to impose.

22. Attached hereto as Exhibit S is a true and correct copy of my January 18, 2006 letter to D. Cameron Baker.

23. Attached hereto as Exhibit T is a true and correct copy of D. Cameron Baker's January 19, 2006 letter to me.

24. Attached hereto as Exhibit U is a true and correct copy of my January 19, 2006 letter to D. Cameron Baker.

25. Attached hereto as Exhibit V is a true and correct copy of D. Cameron Baker's January 20, 2006 letter to me.

26. Attached hereto as Exhibit W is a true and correct copy of my January 23, 2006 letter to D. Cameron Baker.

27. Attached hereto as Exhibit X is a true and correct copy of D. Cameron Baker's January 23, 2006 letter to Peter Sloane.

28. Attached hereto as Exhibit Y is a true and correct copy of Peter Sloane's January 24, 2006 letter to D. Cameron Baker.

29. Attached hereto as Exhibit Z is a true and correct copy of D. Cameron Baker's January 24, 2006 letter to Peter Sloane.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 30<sup>th</sup> day of January, 2006, at New York, New York.



JOSHUA M. GREENBLATT