

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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| LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED, |) | Lead Case No. 02-C-5893 (Consolidated) |
| |) | |
| Plaintiff, |) | CLASS ACTION |
| |) | |
| - against - |) | Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan |
| |) | |
| HOUSEHOLD INTERNATIONAL, INC., ET. AL., |) | |
| |) | |
| Defendants. |) | |

**DECLARATION OF JOSHUA M. GREENBLATT IN SUPPORT OF
DEFENDANTS' (I) RENEWED MOTION TO QUASH PLAINTIFFS'
MARCH 1, 2006 DEPOSITION NOTICE AND (II) MOTION TO QUASH
ALL 13 OF THE NON-PARTY DEPOSITIONS NOTICED AND/OR
SUBPOENAED BY PLAINTIFFS**

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 relevant portions of the transcript of the March 9, 2006 hearing before The Hon. Nan R. Nolan.

3. Attached hereto as Exhibit B is a true and correct copy of a March 13, 2006 email from Luke O. Brooks, counsel for Plaintiffs, to Landis C. Best, counsel for Defendants.

4. Attached hereto as Exhibit C is a true and correct copy of a March 16, 2006 letter from Landis C. Best, counsel for Defendants, to Azra Z. Mehdi, counsel for Defendants.

5. Attached hereto as Exhibit D is a true and correct copy of a March 31, 2006 letter from Azra Z. Mehdi, counsel for Plaintiffs, to Landis C. Best, counsel for Defendants.

6. Attached hereto as Exhibit E is a true and correct copy of a March 31, 2006 letter from D. Cameron Baker, counsel for Plaintiffs, to Landis C. Best, counsel for Defendants.

7. Attached hereto as Exhibit F is a true and correct copy of an April 7, 2006 letter from Landis C. Best, counsel for Defendants, to Azra Z. Mehdi and D. Cameron Baker, counsel for Defendants.

8. Attached hereto as Exhibit G is a true and correct copy of The Hon. Nan R. Nolan's March 9, 2006 Order.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 13th day of April, 2006, at New York, New York.


JOSHUA M. GREENBLATT