

**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 D. CAMERON BAKER CERTIFYING COMPLIANCE WITH THE
COURT'S APRIL 28, 2006 ORDER AND LOCAL RULE 37.2.**

I, D. CAMERON BAKER, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted to the General Bar of the United States District Court in the Northern District of Illinois. I am an attorney in the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel for plaintiffs and the Class 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.

THE CLASS STATEMENT OF COMPLIANCE WITH THE COURT'S APRIL 28, 2006 ORDER AND LOCAL RULE 37.2.

2. In setting a briefing schedule for the disputed Arthur Andersen LLP ("Andersen") documents' motion, the Court's April 28, 2006 Order ("Order") expressly states: "The court reminds the parties that the mere exchange of correspondence will not normally be sufficient to comply with Local Rule 37.2, and urges the parties to schedule a face-to-face meeting regarding this matter."

3. Subsequent to the Court's Order, I sent an email to counsel for the Household International, Inc. ("Household" or the "Company") Defendants requesting to meet and confer on the disputed Andersen documents prior to May 12, the date on which the Household Defendants' brief was due under the Court's Order. When the Household Defendants stated that they wished to meet and confer after that date, I reminded counsel for the Household Defendants of the Court's instructions in its Order. Notwithstanding my reminder, counsel for the Household Defendants declined to meet and confer until May 18, 2006. Attached as Exhibit A is a true and correct copy of my email correspondence with Craig Kesch, counsel for the Household Defendants, on these matters.

4. Regarding the disputed Household documents at issue in the Class's cross-motion, Class counsel first raised an issue relating to document No. 1 in a January 30, 2006 letter. Attached

hereto as Exhibit B is a true and correct copy of my January 30, 2006 letter to Jeremy L. Reiss. In the letter, Class counsel requested that Household withdraw its assertion of privilege as to a document prepared by the Company's General Counsel, Ken Robin, and provided to the Company's auditor, Andersen.

5. The Household Defendants responded claiming that they stood by their privilege assertion. Attached hereto as Exhibit C is a true and correct copy of Jeremy L. Reiss's January 31, 2006 letter to me.

6. With respect to the remaining documents at issue in the cross-motion, during the May 11, 2006 hearing, Class counsel requested leave to file a cross-motion to compel the Household Defendants to produce documents similar to the disputed Andersen documents. The Court granted the Class's request and later that same day, via letter, I identified to counsel for the Household Defendants the categories of documents on Household's privilege logs and the Class's Third Request for Production of Documents at issue. Attached hereto as Exhibit D is a true and correct copy of my May 11, 2006 letter to Landis Best and David Owen. The parties discussed these categories at the May 18 meet and confer, during which the Household Defendants refused to change their previous position as stated on the privilege log and their response to the Class's Third Request for Production of Documents.

7. Attached hereto as Exhibit E is a true and correct copy of excerpts of the transcript of this Court's proceedings on May 11, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 26th day of May, 2006, at San Francisco, California.

s/ D. Cameron Baker

D. CAMERON BAKER

DECLARATION OF SERVICE BY EMAIL AND BY U.S. MAIL

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 May 26, 2006, declarant served by electronic mail and by U.S. Mail the **DECLARATION OF D. CAMERON BAKER CERTIFYING COMPLIANCE WITH THE COURT'S APRIL 28, 2006 ORDER AND LOCAL RULE 37.2** to the parties listed on the attached Service List. The parties' email addresses are as follows:

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and by U.S. Mail to:

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David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of May, 2006, at San Francisco, California.

/s/ Monina O. Gamboa

MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 5/25/2006 (02-0377)

Page 1 of 1

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