

**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 LUKE O. BROOKS IN SUPPORT OF COMPLIANCE WITH
LOCAL RULE 37.2 AND THE CLASS' MOTION TO COMPEL RESPONSES TO
THIRD SET OF INTERROGATORIES FROM HOUSEHOLD DEFENDANTS**

REDACTED VERSION

I, LUKE O. BROOKS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and the United States District Court, 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 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.

2. Counsel for the Class met and conferred with counsel for defendants via recorded conference in compliance with Local Rule 37.2, regarding defendants' Responses and Objections to the Lead Plaintiffs' Third Set of Interrogatories ("Defendants' Responses to the Third Set of Interrogatories") on May 3 and May 5, 2006. I am informed and believe that counsel for the parties met and conferred in person on June 15, 2006 to discuss defendants' supplemental responses to the Class' Third Set of Interrogatories. Attached are true and correct copies of relevant portions of meet and confer transcripts between the parties regarding the Defendants' Responses to the Third Set of Interrogatories:

Exhibit A: Relevant portions of the Meet and Confer Transcript of May 3, 2006; and

Exhibit B: Relevant portions of the Meet and Confer Transcript of May 5, 2006.

3. The parties also exchanged multiple correspondence memorializing their meet and confer discussions. Attached are true and correct copies of relevant correspondence:

Exhibit C: April 12, 2006 Letter from D. Cameron Baker to Landis C. Best re: Defendants' Responses to the Third Set of Interrogatories;

Exhibit D: May 9, 2006 Letter from D. Cameron Baker to Landis C. Best re: Defendants' Responses to the Third Set of Interrogatories;

Exhibit E: May 10, 2006 Letter from Landis C. Best to D. Cameron Baker and Luke Brooks re: Defendants' Responses to the Third Set of Interrogatories;

Exhibit F: May 18, 2006 Letter from Ira J. Dembrow to D. Cameron Baker re: Defendants' Responses to the Third Set of Interrogatories;

- Exhibit G: May 19, 2006 Letter from Ira J. Dembrow to D. Cameron Baker and Luke Brooks re: Defendants' Responses to the Third Set of Interrogatories;
- Exhibit H: May 31, 2006 Letter from Joshua M. Newville to D. Cameron Baker re: Defendants' Responses to the Third Set of Interrogatories;
- Exhibit I: June 2, 2006 Letter from D. Cameron Baker to Craig S. Kesch re: Defendants' Responses to the Third Set of Interrogatories; and
- Exhibit J: June 9, 2006 Letter from Ira J. Dembrow to D. Cameron Baker re: Defendants' Responses to the Third Set of Interrogatories.

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

- Exhibit K: Defendants' Second Amended Responses and Objections to Lead Plaintiff's Third Set of Interrogatories;
- Exhibit L: November-December 2000 Investor Relations Report (HHS 03155440-50);
- Exhibit M: Deposition Transcript of Celeste Murphy, taken April 11, 2006;
- Exhibit N: Exhibit 30 from Lisa Sodeika's Deposition, taken June 6, 2006;
- Exhibit O: July 10, 2002 Meeting Summary of the Credit Extension Risk Monitoring Working Session (HHS 01561549-51);
- Exhibit P: June 26, 2002 Email from Dave K. Stockdale to Walt X. Rybak, Kathryn X. Madison and Rich X. Peters and cc: Paul A Makowski, Jennifer A. Strybel, Daniel J. Pantelis, Tony C. Shelley and Robert J. Pesicka re: RE Secured Reage Policies – Draft Needed by 7/1 (HHS 03433720-22);
- Exhibit Q: May 20, 2002 Email from Rich X. Peters to Paul A. Makowski and cc: Walt X. Rybak regarding current collection practices, charge-off trends and restructures (HHS 01594726);
- Exhibit R: December 10, 2001 *Business Week* article titled "Aggressive Accounting?" (HHS 03069256-57);
- Exhibit S: October 11, 2002 Key Managers' Special Report regarding the AG Settlement (HHS 03070980-91); and
- Exhibit T: October 11, 2002 Conference Call regarding the AG Settlement (HHS 03195991-92).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of June, 2006, at Chicago, Illinois.

s/ Luke O. Brooks

LUKE O. BROOKS

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