

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, ON
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

- *against* -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

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

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**DECLARATION OF IRA J. DEMBROW IN SUPPORT OF HOUSEHOLD
DEFENDANTS' OPPOSITION TO LEAD PLAINTIFFS' MOTION TO COMPEL
HOUSEHOLD DEFENDANTS TO PRODUCE RESPONSIVE DOCUMENTS TO
PLAINTIFFS' THIRD [CORRECTED] REQUEST FOR PRODUCTION OF DOCUMENTS**

I, Ira J. Dembrow, 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 in this action. I have also been admitted *pro hac vice* 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 a February 13, 2006 letter from David Owen, counsel for the Household Defendants, to Bing Ryan, counsel for the Lead Plaintiffs.

3. Attached hereto as Exhibit B is a true and correct copy of a February 15, 2006

letter from Bing Ryan to David Owen.

4. Attached hereto as Exhibit C is a true and correct copy of a June 14, 2006 letter from Craig Kesch, counsel for the Household Defendants, to Azra Mehdi, counsel for the Lead Plaintiffs.


IRA J. DEMBROW