

**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 JASON A. OTTO IN SUPPORT OF DEFENDANTS'
MEMORANDUM OF LAW IN OPPOSITION TO LEAD PLAINTIFFS' MOTION FOR
ADDITIONAL DEPOSITION TIME PURSUANT TO F.R.C.P. 30(d)(2)**

I, Jason A. Otto, declare as follows:

1. I am a member of the bar of the State of New York and an associate of 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 ("Defendants" or "Household") in this action. I have also been admitted *pro hac vice* in this action. Unless otherwise stated, I have personal knowledge of the matters stated herein and, if called upon, could testify competently thereto.

2. I make this Declaration in support of Household's Memorandum of Law in Opposition to Lead Plaintiffs' Motion for Additional Deposition Time Pursuant to F.R.C.P. 30(d)(2).

3. A true and correct copy of the transcript of the June 6, 2006 deposition of Lisa Sodeika is attached hereto as Exhibit 1.

4. A true and correct copy of the Transcript Of Proceedings - Motions Before The Honorable Nan R. Nolan, Magistrate Judge is attached hereto as Exhibit 2.

5. True and correct copies of selected excerpts from the transcript of the February 24, 2006 deposition of Walt Rybak are attached hereto as Exhibit 3.

6. True and correct copies of selected excerpts from the transcript of the May 9, 2006 deposition of Timothy Titus are attached hereto as Exhibit 4.

7. True and correct copies of selected excerpts from the transcript of the April 6, 2006 deposition of Elisa Gargul are attached hereto as Exhibit 5.

8. True and correct copies of selected excerpts from the transcript of the June 13, 2006 deposition of Lidney Clarke are attached hereto as Exhibit 6.

9. True and correct copies of selected excerpts from the transcript of the June 27, 2006 deposition of Carin Rodemoyer are attached hereto as Exhibit 7.

10. True and correct copies of selected excerpts from the transcript of the March 28, 2006 deposition of Per Ekholdt are attached hereto as Exhibit 8.

11. True and correct copies of selected excerpts from the transcript of the June 28, 2006 deposition of Rich Peters are attached hereto as Exhibit 9.

12. True and correct copies of David R. Owen, Esq.'s June 15 and 16, 2006 correspondence to Azra Z. Mehdi, Esq. are attached hereto as Exhibit 10.

13. A true and correct copy of my April 24, 2006 letter to D. Cameron Baker, Esq. is attached hereto as Exhibit 11.

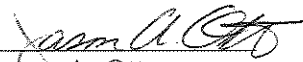
14. A true and correct copy of my April 26, 2006 e-Mail correspondence with D. Cameron Baker, Esq. is attached hereto as Exhibit 12.

15. A true and correct copy of David R. Owen, Esq.'s June 19, 2006 e-Mail correspondence with D. Cameron Baker, Esq. is attached hereto as Exhibit 13.

16. A true and correct copy of Luke Brooks's June 23, 2006 e-Mail correspondence with Craig Kesch, Esq. is attached hereto as Exhibit 14.

17. A true and correct copy of Lori A. Fanning, Esq.'s March 17, 2006 letter to Hon. Nan R. Nolan is attached hereto as Exhibit 15.

18. A true and correct copy of the Court's March 17, 2006 Minute Order is attached hereto as Exhibit 16.


Jason A. Otto