

**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. )	
_____ )	

**REPLY DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS'  
MOTION TO COMPEL HOUSEHOLD DEFENDANTS' RESPONSES TO THE THIRD  
SET OF INTERROGATORIES**

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

- Exhibit 1: May 16, 2001 Memo from Gregory Snyder to Larry Bangs, *et al.* re: Responsible Lending Rapid Response Team (HHS 02911562-63);
- Exhibit 2: May 31, 2006 Letter from Luke O. Brooks to Ira J. Dembrow re: Defendants' June 25, 2004 initial disclosures;
- Exhibit 3: June 8, 2006 Letter from Ira J. Dembrow to Luke O. Brooks re: Defendants' June 25, 2004 initial disclosures;
- Exhibit 4: Estimate of Attorney General Costs (HHS 03070933-38);
- Exhibit 5: January 20, 2002 Memo from Robin Allcock to Gary Gilmer, *et al.* re: Executive Complaints 2001 Review (HHS 02939244-46);
- Exhibit 6: July 2, 2002 Effective Rate Complaint Review (HHS 03418244-56);
- Exhibit 7: May 2002 Household-Audit Committee (HHS 03150529-45).
- Exhibit 8: OCC Report of Examination, September 1999 (HHS 03117381-82; HHS 03117392);
- Exhibit 9: February 14, 2002 Memo from Margaret A. Sprude to Bobby Mehta, *et al.* re: OCC Update (HHS 01232632-33);
- Exhibit 10: February 19, 2002 Regulatory Strategy: Briefing on OCC Positions (HHS 01884718-20);
- Exhibit 11: March 24, 2006 Letter from Landis C. Best to D. Cameron Baker re: Judge Nolan's February 17, 2006 Order with respect to Plaintiffs' Second Interrogatories;
- Exhibit 12: Excerpts from August 27, 2001 OTS Report of Examination; and
- Exhibit 13: October 11, 2002 Household Int'l Conference Call Transcript (HHS-03195991-6012).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 20th day of July, 2006, at San Francisco, California.

s/ Luke O. Brooks  
\_\_\_\_\_  
LUKE O. BROOKS

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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 July 21, 2006, declarant served by electronic mail and by U.S. Mail the **REPLY DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' MOTION TO COMPEL HOUSEHOLD DEFENDANTS' RESPONSES TO THE THIRD SET OF INTERROGATORIES (REDACTED VERSION)** to the parties listed on the attached Service List. The parties' email addresses are as follows:

[TKavaler@cahill.com](mailto:TKavaler@cahill.com)  
[PSloane@cahill.com](mailto:PSloane@cahill.com)  
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.  
Law Offices of Lawrence G. Soicher  
110 East 59th Street, 25th Floor  
New York, NY 10022

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 21st day of July, 2006, at San Francisco, California.

s/ Marcy Medeiros  
\_\_\_\_\_  
MARCY MEDEIROS