

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

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

Plaintiff,

- *against* -

HOUSEHOLD INTERNATIONAL, INC., ET. AL.,

Defendants.

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

CLASS ACTION

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**DECLARATION OF PATRICIA FARREN IN SUPPORT OF THE HOUSEHOLD
DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO COMPEL DISCOVERY
FROM ANDREW KAHR**

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

PATRICIA FARREN declares and says:

1. I am a member of the bar of the State of New York and a member 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 (the "Household Defendants") in this action. I submit this Declaration to place before the Court certain information and documents referenced in The Household Defendants' Response to Plaintiffs' Motion to Compel Discovery from Andrew Kahr.

2. On June 23, 2004, Defendants produced a set of documents to Plaintiffs that had been previously produced to the SEC, including the document that is attached to the Declaration of Luke O. Brooks in Support of Plaintiffs' Motion ("Brooks Decl.") as Exhibit 5.

3. In April of 2005, Defendants made multiple document productions to Plaintiffs, including about 400 pages of documents related to Andrew Kahr, which included Brooks Decl. Exhibits 1, 4 and 6.

4. On October 26, 2006, Ira Dembrow, Esq., one of the counsel for the Household Defendants, sent a letter to Jason Davis, Esq., one of the counsel for Plaintiffs, asking whether or not Andrew Kahr had been served with Plaintiffs' subpoena. At a meet and confer session on the same day, Luke O. Brooks, Esq., one of the counsel for Plaintiffs, announced the intention of Plaintiffs to file a Motion related to Mr. Kahr pursuant to the Walsh Act.

5. On November 3, 2006, Craig Kesch, Esq., one of the counsel for the Household Defendants, sent a letter to Jason Davis asking when Plaintiffs would file their promised Motion related to Mr. Kahr pursuant to the Walsh Act.

6. Attached as Exhibit A is a true and correct copy of Senate Report 1580.

7. Attached as Exhibit B is a true and correct copy of excerpts from the transcript of the July 28, 2006 Deposition of Paul Creatura.

8. Attached as Exhibit C is a true and correct copy of excerpts from the transcript of the June 22, 2006 Deposition of Ned Hennigan.

9. Attached as Exhibit D is a true and correct copy of excerpts from the transcript of the May 4, 2006 Deposition of Tom Schneider.

10. Attached as Exhibit E is a true and correct copy of excerpts from the transcript of the June 6, 2006 Deposition of Lisa Sodeika.



Patricia Farren

7th day of December, 2006.