

**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 JANET A. BEER IN SUPPORT OF THE
HOUSEHOLD DEFENDANTS' MEMORANDUM IN
OPPOSITION TO THE SUPPLEMENTAL DECLARATION OF
AZRA Z. MEHDI IN SUPPORT OF PLAINTIFFS' OBJECTION
TO THE MAGISTRATE'S JULY 6, 2006 ORDER APPLYING
THE ATTORNEY WORK-PRODUCT DOCTRINE TO AUDIT
LETTERS AND RELATED DOCUMENTS
(FILED UNDER SEAL PURSUANT TO COURT ORDER)**

**RESTRICTED DOCUMENT PURSUANT TO L.R.26.2
FILED UNDER SEAL PURSUANT TO PROTECTIVE ORDER DATED NOVEMBER 5,
2004 AND THE MINUTED ORDER DATED OCTOBER 10, 2006 (DOCKET 704)**

I, JANET A. BEER, declare as follows:

1. I am a member of the bar of the State of New York, admitted to this Court *pro hac vice* in connection with the above-captioned matter, and an attorney associated with the firm Cahill Gordon & Reindel LLP, co-counsel for defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar in this action. I submit this declaration to place before the Court a document that bears on Defendants' opposition to the Supplemental Declaration of Azra Z. Mehdi in Support of Plaintiffs' Objection to the Magistrate's July 6, 2006 Order Applying the Attorney Work Product Doctrine to Audit Letters and Related Documents.
2. Attached hereto as Exhibit One is a copy of a document bearing Bates stamp PFG 000009, which is a February 14, 2002 letter produced in this action by third party Promontory Financial Group.

Executed this 20th Day of December, 2006 in New York, New York.


JANET A. BEER

EXHIBIT ONE

FILED UNDER SEAL