

**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

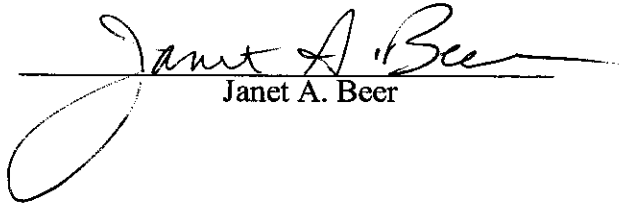
**AFFIDAVIT OF JANET A. BEER IN FURTHER SUPPORT
OF HOUSEHOLD DEFENDANTS' MOTION FOR
SANCTIONS INCLUDING A RECOMMENDATION OF
DISMISSAL FOR FAILURE TO RESPOND AND TO
COMPEL RESPONSES TO DEFENDANTS' COURT
AUTHORIZED SUPPLEMENT TO DEFENDANTS'
SECOND SET OF INTERROGATORIES**

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

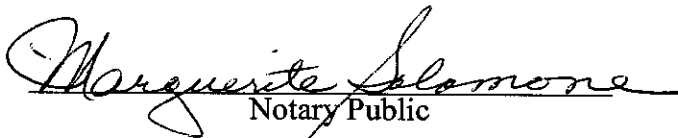
JANET A. BEER, being first duly sworn, deposes and says:

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 caption matter, and am 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 make this affidavit to place before the Court certain documents in further support of Household Defendants' Motion for Sanctions Including a Recommendation of Dismissal for Failure to Respond and to Compel Responses to Defendants' Court Authorized Supplement to Defendants' Second Set of Interrogatories.

2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the August 22, 2006 Hearing on Motions Before the Honorable Nan R. Nolan, Magistrate Judge, excerpted.


Janet A. Beer

Sworn to before me this
3rd day of January, 2007.


Notary Public

MARGUERITE SALAMONE
Notary Public, State of New York
No. 01SA4814416
Qualified in New York County
Commission Expires October 5, 2010

EXHIBIT 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS (Chicago)

LAWRENCE E. JAFFE, etc.,)	
et al.,)	
)	
Plaintiffs,)	
)	
v.)	Docket No. 02-CV-5893
)	
HOUSEHOLD INTERNATIONAL, INC.,)	
et al.,)	Chicago, Illinois
)	August 22, 2006
Defendants.)	

HEARING ON MOTIONS
BEFORE THE
HONORABLE MAGISTRATE JUDGE NAN R. NOLAN

APPEARANCES:

For the Class:

CAMERON BAKER
LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
100 Pine Street, #2600
San Francisco, CA 94111

LORI FANNING
MILLER, FAUCHER & CAFFERTY LLP
30 North LaSalle Street
Suite 3200
Chicago, IL 60602

For Defendants:

PATRICIA FARREN
CAHILL, GORDON & REINDEL
80 Pine Street
New York, NY 10005

APPEARANCES: (Continued)

For the Household
Defendants:

ADAM B. DEUTSCH
EIMER, STAHL, KLEVORN & SOLBERG LLP
224 South Michigan Avenue
Suite 1100
Chicago, IL 60604

TRANSCRIBER'S NOTE: One attorney was standing too far from the microphone for some of her statements to be audible. Attorneys must speak directly into the microphones.

PLEASE SUPPLY CORRECT VOICE IDENTIFICATION.

Transcribed by:

Riki Schatell
6033 North Sheridan Road, 28-K
Chicago, Illinois 60660
773/728-7281

Proceedings recorded by electronic sound recording, transcript produced by transcription service.

1 setting one. The response is due September 1st. The reply is
2 due September 8th. We'll take a look at that, okay?

3 MS. FARREN: Your Honor, may I ask one simple
4 question, please?

5 THE COURT: Um-hum.

6 MS. FARREN: Earlier when you were talking about
7 Plaintiffs' Motion for Reconsideration, you said that you're
8 standing by your observations in the order about the number of
9 interrogatories except adding that no party may propound new
10 interrogatories without permission. I wanted to know, Judge,
11 if that impacts that part of your ruling -- If you remember, it
12 was right at the end and you were talking about five interroga-
13 tories that we thought said A, and they interpreted
14 differently? And you gave us permission, Judge, to reframe
15 those five in a way -- to -- in the way we had intended.

16 Does that permission still stand, your Honor?

17 THE COURT: Yes. It does.

18 MS. FARREN: Thank you. We appreciate all your time,
19 your Honor.


20 THE COURT: Okay.

21 MR. BAKER: Thank you, your Honor.

22 THE COURT: I'll see you in September.

23 (Hearing adjourned.)

I, RIKI SCHATELL, certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.



Riki Schatell

August 24, 2006
Date