

**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 LANDIS C. BEST IN SUPPORT OF THE HOUSEHOLD  
DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO COMPEL ANDREW  
KAHR DOCUMENTS ALLEGEDLY IMPROPERLY WITHHELD AS PRIVILEGED  
OR DESTROYED BY THE HOUSEHOLD DEFENDANTS**

**REDACTED VERSION**

I, LANDIS C. BEST, declare as follows:

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 have been admitted *pro hac vice* in this matter.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the transcript of the deposition of Paul Creatura on July 28, 2006.

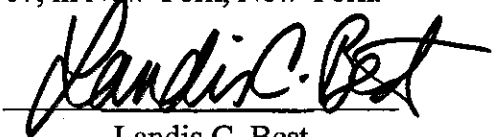
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3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the transcript of the deposition of Thomas Detelich on December 22, 2006.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts from the preliminary transcript of the deposition of Gary Gilmer on January 12, 2007.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from the transcript of the deposition of Household's General Counsel, Kenneth H. Robin, Esq., on December 7, 2006.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 17th day of January, 2007, in New York, New York.

  
Landis C. Best

# EXHIBIT A

Document filed  
under seal

# EXHIBIT B

Document filed  
under seal

# EXHIBIT C

Document filed  
under seal



# EXHIBIT D

Document filed  
under seal