

**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.)	
_____)	

**DECLARATION OF JASON C. DAVIS IN SUPPORT OF THE CLASS' MOTION FOR
RECONSIDERATION OF THE COURT'S JANUARY 24, 2007 ORDER
OR FOR ALTERNATIVE RELIEF REGARDING STOCK REPURCHASE
DISCOVERY**

I, JASON C. DAVIS, 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. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for Lead Plaintiffs and 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: The Class' Fifth Request for Production of Documents to Household International, Inc., William Aldinger, David Schoenholz, Gary Gilmer, and J.A. Vozar;
- Exhibit 2: The Household Defendants' Objections and Responses to Plaintiffs' Fifth Request for Production of Documents;
- Exhibit 3: Excerpt of Defendants' Status Report for the November 30, 2006 Status Conference, Dkt. No. 782;
- Exhibit 4: December 15, 2006 Minute Order, Dkt. No. 831;
- Exhibit 5: Letter from Landis C. Best to Azra Z. Mehdi, dated December 18, 2006;
- Exhibit 6: Letter from Jason C. Davis to Landis C. Best, dated December 20, 2006;
- Exhibit 7: Defendants' Status Report for the January 10, 2007 Status Conference Before Magistrate Judge Nolan, Dkt. No. 883;
- Exhibit 8: Excerpt of January 10, 2007 hearing transcript;
- Exhibit 9: The Class' Status Report to Magistrate Judge Nan R. Nolan in Advance of the January 24, 2007 Status Conference, Dkt. No. 927;
- Exhibit 10: January 24, 2007 Minute Order, Dkt. No. 934;
- Exhibit 11: Excerpt of January 24, 2007 draft hearing transcript;
- Exhibit 12: Excerpt of Chart Reflecting Historic Trading Prices and Volumes of Household Common Stock, Obtained from "Sungard" Database; and
- Exhibit 13: Excerpt of Household Form 10-Q filed with the Securities and Exchange Commission on May 10, 2000.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of February, 2007, at San Francisco, California.

s/ Jason C. Davis

JASON C. DAVIS

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