

**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 LUKE O. BROOKS IN SUPPORT OF THE CLASS' RESPONSE
TO HOUSEHOLD DEFENDANTS' MOTION TO COMPEL RESPONSES TO
DEFENDANTS' [EIGHTH] SET OF INTERROGATORIES TO LEAD PLAINTIFFS**

(REDACTED VERSION)

I, LUKE O. BROOKS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted to the General Bar of the United States District Court in the Northern District of Illinois. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel for 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 A: Letter from Luke O. Brooks to David R. Owen dated February 13, 2007;

Exhibit B: Excerpt of Lead Plaintiffs' Amended Supplemental Responses and Objections to Household Defendants' [Fourth] Set of Interrogatories to Lead Plaintiffs, served on December 1, 2006;

Exhibit C: Letter from the Minnesota Department of Commerce to Household Industrial Finance Company dated October 15, 2002, Bates Nos. HHS 03442011-52; and

Exhibit D: Letter from Nebraska Department of Banking and Finance to Household Finance Corporation dated December 12, 2001, Bates No. HHS 03436255-92.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 2nd day of March, 2007, at San Francisco, California.

s/ Luke O. Brooks

LUKE O. BROOKS

DECLARATION OF SERVICE BY EMAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on March 2, 2007, declarant served by electronic mail and by U.S. Mail to the parties the: **DECLARATION OF LUKE O. BROOKS IN SUPPORT OF THE CLASS' RESPONSE TO HOUSEHOLD DEFENDANTS' MOTION TO COMPEL RESPONSES TO DEFENDANTS' [EIGHTH] SET OF INTERROGATORIES TO LEAD PLAINTIFFS (Redacted Version)**. The parties' email addresses are as follows:

TKavaler@cahill.com PSloane@cahill.com PFarren@cahill.com LBest@cahill.com DOwen@cahill.com	NEimer@EimerStahl.com ADeutsch@EimerStahl.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
110 East 59th Street, 25th Floor
New York, NY 10022

David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2nd day of March, 2007, at San Francisco, California.

s/ Monina O. Gamboa

MONINA O. GAMBOA