

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

-----X
LAWRENCE E. JAFFE PENSION PLAN, ON
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

- against -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.
-----X

Lead Case No. 02-C5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman

**DECLARATION OF LANDIS C. BEST IN SUPPORT OF
DEFENDANTS' CROSS-MOTION PURSUANT TO
FED. R. CIV. P. 37(C) TO EXCLUDE DECLARATIONS OF
PLAINTIFFS' PREVIOUSLY CONCEALED WITNESSES**

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 of 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 (the "Household Defendants") in this action. I am admitted *pro hac vice* in this Court for this action. I submit this declaration to place before the Court certain documents and information in support of Defendants' Cross-Motion Pursuant to Fed. R. Civ. P. 37(c) to Exclude Declarations of Plaintiffs' Previously Concealed Witnesses. I make this declaration based on my personal knowledge as well as my review of relevant documents.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1), dated June 25, 2004.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1), dated August 20, 2004. Plaintiffs have not supplemented the list of individuals contained in their Amended Initial Disclosures at any time since August 20, 2004.

4. Attached hereto as Exhibit 3 is a true and correct copy of Defendants' Fifth Set of Interrogatories to Lead Plaintiffs, dated December 22, 2006.

5. Attached hereto as Exhibit 4 is a true and correct copy of relevant excerpts of Plaintiffs' Amended Responses and Objections to Defendants' [Eighth] Set of Interrogatories, in response to Defendants' Fifth Set of Interrogatories, dated January 29, 2007.

6. Attached hereto as Exhibit 5 is a true and correct copy of relevant excerpts of Plaintiffs' Fifth Amended Responses and Objections to Defendants [Eighth] Set of Interrogatories, in response to Defendants' Fifth Set of Interrogatories, dated February 1, 2008.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Witness List, received by counsel for Defendants via email on October 31, 2008.

8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiffs' Revised Witness List, received by counsel for Defendants via email on November 12, 2008.

9. Attached hereto as Exhibit 8 is a true and correct copy of the November 7, 2008 letter from Ira J. Dembrow to Luke O. Brooks.

10. Attached hereto as Exhibit 9 is a true and correct copy of the November 10, 2008 letter from Luke O. Brooks to Ira J. Dembrow.

11. Attached hereto as Exhibit 10 is a true and correct copy of the November 21, 2008 Letter from Ira J. Dembrow to Luke O. Brooks.

12. Attached hereto as Exhibit 11 is a true and correct copy of the November 24, 2008 letter from Luke O. Brooks to Ira J. Dembrow.

13. On November 25, 2008, I, along with my colleagues Joshua Newville, Jason Hall and Lauren Perlgut, held a telephonic meet-and-confer with Plaintiffs' counsel, including Luke O. Brooks, D. Cameron Baker, Spence Burkholz and Azra Mehdi, concerning Plaintiffs' nine previously undisclosed trial witnesses and other topics.

14. During the November 25 meet-and-confer, counsel for Plaintiffs represented that they did not learn of the nine witnesses and their relevant knowledge until after the close of fact discovery. Plaintiffs' counsel refused to answer further questions regarding the dates on which Plaintiffs discovered the existence of the nine witnesses or when Plaintiffs conducted their "continuing factual investigation" to discover such witnesses, citing work product protection.

15. During the November 25 meet-and-confer, counsel for Plaintiffs demanded to know how Defendants were prejudiced by the late disclosure of the nine witnesses. In response, I noted that it is Plaintiffs' burden to show substantial justification for their delay and to show a lack of prejudice to Defendants. Nevertheless, I set forth ways in which Defendants are prejudiced by the late disclosure of the nine witnesses, including that the belated disclosure of witnesses deprived Defendants of information during the discovery period, which is long over, and that investigating nine new surprise witnesses and an untold number of rebuttal witnesses would require the diversion of substantial resources while Defendants are already busy preparing the pretrial order components and preparing for trial. Counsel for Plaintiffs responded that Defendants cannot demonstrate prejudice and that Plaintiffs are entitled to present these witnesses at trial. Plaintiffs' counsel also stated that pretrial depositions of the nine witnesses would not be appropriate or justified under the circumstances, even though Defendants never asked for depositions of these witnesses.

16. During the November 25 meet-and-confer, I asked that Plaintiffs agree to remove the nine new witnesses from their witness list. Plaintiffs' counsel declined to do so.

17. Attached hereto as Exhibit 12 is a true and correct copy of Plaintiffs' Witness List, received by counsel for Defendants via email on January 15, 2009.

18. Attached hereto as Exhibit 13 is a true and correct copy of the January 17, 2009 email from Luke Brooks to me, Josh Newville, and Cameron Baker, stating that Plaintiffs "inadvertently" left James Bernstein off of the witness list sent on January 15, 2009.

19. Attached hereto as Exhibit 14 is a true and correct copy of the August 24, 2004 letter from L. Anthony Pellegrino to Luke Brooks and Monique Winkler.

20. During 2005 and 2006, Defendants searched for and produced relevant, non-privileged emails from 291 current and former Household employees requested by Plaintiffs, including 129 agreed-upon custodians and 162 additional custodians pursuant to Magistrate Judge Nolan's Oct. 31, 2005 Order. Plaintiffs did not request emails for any of the seven declarants.

_____/s/ Landis C. Best _____

Landis C. Best

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 19th day of January, 2009, in New York, New York.

Exhibit 1

ORIGINAL

**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,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	Judge Ronald A. Guzman
)	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
Defendants.)	
_____)	

**PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 26(a)(1)**

I. INTRODUCTION

Lead plaintiff Glickenhau & Company ("Glickenhau"), PACE Industry Union Management Pension Fund ("PACE"), The International Union of Operating Engineers Local No. 132 Pension Plan ("IUOE"), together with named plaintiffs, The Archdiocese of Milwaukee Supporting Fund, Inc. ("AMS Fund") and The West Virginia Laborers' Trust Fund ("West Virginia Fund") (collectively with lead plaintiff, "plaintiffs") make the following initial disclosures to defendants pursuant to Fed. R. Civ. P. 26(a)(1). Plaintiffs' Initial Disclosures are made without waiver of, or prejudice to, any objections they may have. Plaintiffs expressly reserve all objections, including, but not limited to: (a) relevance; (b) attorney-client privilege; (c) work product protection; (d) privacy; (e) any other applicable privilege or protection under federal or state law; (f) undue burden; (g) materiality; (h) overbreadth; and (i) the admissibility in evidence of these Initial Disclosures or the subject matter thereof. Plaintiffs further reserve their right to move for a protective order.

All formal discovery was stayed pursuant to the mandatory discovery stay provision of the Private Securities Litigation Reform Act until the [Corrected] Amended Consolidated Class Action Complaint for Violation of the Federal Securities Laws (the "Complaint") was upheld on March 19, 2004. Further, plaintiffs have not yet completed their investigation of this case and discovery may reveal additional documents or additional individuals and/or entities likely to have discoverable information that plaintiffs may use to support their claims. As such, plaintiffs reserve the right to clarify, amend, modify or supplement the information contained in these Initial Disclosures, if and when plaintiffs obtain supplemental information, if required by the Federal Rules of Civil Procedure or the Local Rules.

II. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION UNDER FED. R. CIV. P. 26(a)(1)(A)

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), plaintiffs believe that the following individuals are likely to have discoverable information that plaintiffs may use to support their claims:

A. Plaintiffs

The following individuals associated with Glickenhau are likely to have discoverable information relating to Glickenhau's investments in Household International, Inc.¹ ("Household") as described in the Complaint in this action:

James Glickenhau
General Partner
Glickenhau & Company
c/o Lerach Coughlin Stoia & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Tel: 415/288-4545

The following individuals associated with PACE are likely to have discoverable information relating to PACE's investments in Household as described in the Complaint in this action:

Maria Wieck
Funds Administrative Manager
PACE Industry Union Management Pension Fund
c/o Lerach Coughlin Stoia & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Tel: 415/288-4545

The following individuals associated with IUOE are likely to have discoverable information relating to IUOE's investments in Household as described in the Complaint in this action:

¹ Unless specified otherwise, Household includes all its subsidiaries, including, but not limited to, Household Finance Corporation, Household Realty Corporation and Beneficial Corporation, subsequent to its merger with Household on June 30, 1998.

John Nooner
Custodian
The International Union of Operating Engineers Local No. 132 Pension Plan
c/o United Bank
500 Virginia Street, East
Charleston, WV 25301
Tel: 304/348-8400

The following individuals associated with AMS Fund are likely to have discoverable information relating to AMS Fund's investments in Household as described in the Complaint in this action:

Patrick J. Byrne
Chief Financial Officer
The Archdiocese of Milwaukee Supporting Fund, Inc.
c/o Lerach Coughlin Stoia & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Tel: 415/288-4545

Michael G. Hull
Senior Vice President
Smith Barney – Citigroup Global Markets
1 South Pineknay Street, #300
Madison, WI 53703
Tel: 608/251-4477

The following individuals associated with West Virginia Fund are likely to have discoverable information relating to AMS Fund's investments in Household as described in the Complaint in this action:

Richard Fredeking
The West Virginia Laborers' Trust Fund
c/o Lerach Coughlin Stoia & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Tel: 415/288-4545

B. Defendants

The following individuals and entities have discoverable information relating to subjects in the Complaint, including, but not limited to: (a) Household's business, finances and operations; (b)

defendants' knowledge of Household's business, finances and operations; (c) defendants' improper accounting relating to Household's business, finances and operations; (d) defendants' scheme to artificially inflate the earnings of Household; (e) defendants' scheme to artificially inflate the price of Household's securities; (f) Household's improper, abusive and illegal lending practices; (g) Household's improper reaging practices and restructuring of delinquent loans; (h) Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; (i) defendants' false and misleading statements relating to Household's business, finances and operations; (j) Household's securitization of its loan pools to raise capital; (k) Household's debt securities offerings identified in the Complaint; (l) defendants' executive compensation, bonuses and other benefits; (m) the circumstances around the sale of Household to HSBC Holdings plc; and/or (n) any other undisclosed arrangements between defendants:

1. Household International, Inc., including all its subsidiaries
2. Household Finance Corporation
3. William Aldinger
4. David Schoenholz
5. Gary Gilmer
6. J.A. Vozar
7. Arthur Andersen LLP

C. Other Persons and Entities

The following individuals and entities have discoverable information relating to subjects in the Complaint, including, but not limited to: (a) Household's business, finances and operations; (b) defendants' knowledge of Household's business, finances and operations; (c) defendants' improper accounting relating to Household's business, finances and operations; (d) defendants' scheme to artificially inflate the earnings of Household; (e) defendants' scheme to artificially inflate the price of Household's securities; (f) Household's improper, abusive and illegal lending practices; (g) Household's improper reaging practices and restructuring of delinquent loans; (h) Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing

agreements; (i) defendants' false and misleading statements relating to Household's business, finances and operations; (j) Household's securitization of its loan pools to raise capital; (k) Household's debt securities offerings identified in the Complaint; (l) defendants' executive compensation, bonuses and other benefits; (m) the circumstances around the sale of Household to HSBC Holdings plc; and/or (n) any other undisclosed arrangements between defendants:

1. Adams, Tamara
2. Alexander, Suzanne
3. Allshouse, David
4. Alpert, Mark (Deutsche Banc Alex. Brown)
5. American Banker
6. AmeriCredit Corp.
7. Ancona, Edgar
8. Arrowhead Economic Opportunity Agency (Minnesota)
9. Associated Press (AP Online)
10. Associates First Capital
11. Association of Community Organizations for Reform Now (ACORN)
12. Avila, Cindy
13. Avila, Jose
14. Avila, Joseph
15. Bangs, Lawrence N.
16. *Barron's*
17. Battle, Michael
18. Beckett, Juanita
19. Bell, James
20. Bell, Murelin
21. *Bellingham Herald*
22. Bennett, Brenda
23. Bennett, Carl
24. Blake, Timothy
25. Bley, Anne
26. Bley, Michael
27. Boudreaux, Cynthia
28. Boudreaux, Leon
29. Brooks, Charles
30. Brooks, Renee
31. Brown, Emily
32. Brown, Lawrence
33. Brown, Pamela
34. *Business Week*
35. Byers, Fredrick
36. Byers, Sonya
37. Byington, Edith
38. Cabral, Lisa

39. Cabral, Mark
40. California Congress of Seniors
41. California Department of Corporations
42. California Reinvestment Committee
43. Callander, Robert J.
44. Campana, Tina M.
45. Caspersen, Finn M. W.
46. Center for Community Change
47. Chaffins, Leanna
48. Cho, Angela
49. *Christian Science Monitor*
50. *CIO* magazine
51. Clark, Robert C.
52. Clay, Billy W.
53. Clay, Delores
54. Coburn, Michelle
55. Cocoa, Alma
56. Colby, Pecola L.
57. Cole, Jaime
58. Coleman, Leonard S., Jr.
59. Colgan, John
60. Commissioner of Banks of North Carolina
61. Community Action Committee of the Lehigh Valley (Pennsylvania)
62. Connell, Jerry
63. Connell, Linda
64. Consumers Union
65. ContiFinancial
66. *Contra Costa Times*
67. Copley News Service
68. Corcn, S. (Bear Sterns)
69. Cossetti, Claudia
70. Coy, Elizabeth
71. Coy, Gary
72. Cross, Chuck
73. Darnall, Robert J.
74. Davis, Mary
75. Davis, Reed
76. Detelich, Thomas
77. Dillon, Gary G.
78. Dockery, Darlene
79. Dodge, Cory
80. Dodge, Jennifer
81. Donohue, Matthew
82. Duff & Phelps Credit Rating Co.
83. Dyche, Jared
84. Eden, Kurt
85. Edwardson, John A.
86. Emerson, Tracy

87. Etheridge, Cheryl
88. Fabiano, Rocco J.
89. Farris, David J.
90. Fenton, Debra
91. Fenton, Marty
92. Fishburn, Dudley
93. Fitch
94. *Forbes*
95. Foreclosure Prevention Project (New York)
96. Fort Knox National Bank
97. Foster, Morris
98. Freidheim, Cyrus F., Jr.
99. Frost, Michael L.
100. Galindo, Corina
101. Gallagher, Colleen
102. Gibson, Greg
103. Gilliam, James H., Jr.
104. Goldman Sachs & Co., Inc.
105. Gombert, Joel (William Blair & Company L.L.C.)
106. Grant, Rachel
107. Greater Rochester Community Reinvestment Coalition
108. Greenlining Institute
109. Guzman, Juan
110. Guzman, Maria
111. Hall, Jason
112. Halvorsen, Andrew C.
113. Hanley, Thomas (Warburg Dillon Read)
114. Harvey, Ken
115. Hayden, Megan
116. Hendrickson, Lora
117. Hendrix, D. (Friedman, Billings, Ramsey & Co.)
118. Hernandez, Roland A.
119. Hillier, J. Robert
120. Hinson, Reginald
121. Hochstim, D. (Bear Stearns)
122. Hoeffle, George
123. Holm, Gerald L.
124. Howard, Jada
125. HSBC Holdings plc
126. Hueman, Dennis
127. Hulse, Norma
128. Hulse, Thomas A.
129. Indiana Department of Insurance and Financial Institutions
130. J.P. Morgan
131. Jackson, Timothy
132. James Bernstein (former Minnesota Commissioner of Commerce)
133. Johnston, Mary B.
134. Johnston, Julian

135. Johnston, Terry
136. Jones, Annie
137. Jordan, Beulah
138. Kahre, Eileen
139. Kean, Thomas H.
140. Kellogg, Jennifer
141. Kelly, Jeffrey
142. KPMG LLP
143. Kwidzinski, Bruce
144. Lane, David II
145. Lemmon, Jared
146. Lester, Robert
147. Levy, Louis E.
148. Lewis, Joe
149. Long Island Housing Services, Inc.
150. Lorch, George A.
151. Lower East Side People's Federal Credit Union (New York)
152. Luna, Jeanie
153. Luna, Joseph
154. Lundquist, Jami
155. Lundquist, Justin
156. MacDonald, John (UBS Warburg LLC)
157. Madura, Carla
158. Malarkey, Susannah
159. Marco, William
160. Marshall, Chad
161. Martin, Ross
162. Mason, Robert L.
163. Mayes, Thomas
164. MBNA Consumer Services Inc.
165. Mehta, Bobby
166. Merrill Lynch, Pierce, Fenner & Smith, Inc.
167. Merryman, Michele
168. Metropolitan Council of the New York State Conference of the NAACP
169. Miclitz, Doug
170. Moonwind, Jolcen A.K.
171. Moore, Betty J.
172. Moore, James
173. Moore, Timothy
174. Muller, Steven
175. Murphy, David J.
176. Myers, William
177. Napoli, R. (ABN AMRO)
178. National Consumer Law Center
179. *National Mortgage News*
180. Neal, Geniva
181. Nelson, Cheryl
182. Nelson, Elsie L.

183. Nelson, Mark
184. Nelson, Neil
185. Newman, Sally
186. Nguyen, Jackie
187. Nichols, John D.
188. Nolan, Bill
189. Odoi, Sam
190. Oleson, Leia
191. Oliver, Judy
192. Olson-Murphy, James
193. Osborn, Jeffrey
194. Osborn, Mildred
195. Osmulski, Kerri
196. Patel, Mina
197. Paul, Brian P.
198. Paul, Cheryl A.
199. Pecheos, Sue S.
200. Pemberton, Arthur A.
201. Pemberton, Gay M.
202. Peters, Doreen
203. Pickett, Kathy
204. Pirblado, James B.
205. Pisinger, Todd A. (Friedman, Billings, Ramsey & Co.)
206. Poling, Brandy
207. Provident Financial Corp.
208. Ramirez, Alex
209. Responsible Wealth Project of United for a Fair Economy
210. Reyes, Irene
211. Reyes, Julio
212. Reynolds, Stacey
213. Robertson, Regina C.
214. Robinson, Josephine
215. Robinson, Rebecca
216. Ross, Susan Julia
217. Rutland-Drury, Melissa
218. Schneider, Tom
219. Scutti, Jennifer (Prudential Securities)
220. Seaton, Victor
221. Shiba, Donald
222. Smart, Georgia
223. Smartt, Symoria
224. Smith, David
225. Smith, Jaime
226. Smith, Jerry
227. Smith, Jr., Joseph A.
228. Sochol, David (Legg Mason)
229. South Brooklyn Legal Services
230. Spassov, Teri

231. Speller, Kedra
232. *Star-Tribune* (Minneapolis-St. Paul)
233. State Attorney Generals and/or state financial regulators involved in the multi-state settlement with Household and Beneficial Corporation of predatory lending charges
234. Stewart, S. Jay
235. Stroom, Craig
236. Sullivan, Louis W.
237. Swanberg, G. (Deutsche Banc Alex. Brown)
238. Swanson, David
239. Tapia, Maria
240. *The Record*
241. *The Wall Street Journal*
242. Thomas Golden,
243. Torres, Julie
244. Trojanowski, Jack
245. Tucker, Robert A.
246. Tull, Marc
247. Turner, Corey
248. Vega, Mireya
249. Wachter, Susan M.
250. Walsh, Robert (City Council Member, Bridgeport, Conn)
251. Washington Department of Financial Institutions
252. Weaver, Ken
253. Willa, Joan (J.I.)
254. Williams, Bobby
255. Williams, Shantel
256. Wilmer, Walter, Jr.
257. Winkler, Jason
258. Wright, Rcncc
259. Xu, Sophie
260. Young, William
261. Zarnetti, Jennifer

Additionally, plaintiffs believe that there are Regional Sales Managers (RSM), District Sales Managers (DSM), Branch Sales Managers (BSM), Senior Account Executives, Account Executives (AE), Sales Assistants, as well as trainers, collections people, underwriters, and other individuals within the Household organization whose identities are not known to plaintiffs at this time, who are likely to have discoverable information relating to one or more of the subjects outlined in the Complaint. At this time, plaintiffs' investigation is continuing and plaintiffs will supplement the

information contained in the Initial Disclosures as additional information becomes available to plaintiffs.

III. COPY OR DESCRIPTION BY CATEGORY OF DOCUMENTS AND TANGIBLE THINGS RELEVANT TO FACTS ALLEGED IN THE PLEADINGS UNDER FED. R. CIV. P. 26(a)(1)(B)

Pursuant to Fed. R. Civ. P. 26(a)(1)(B), plaintiffs respond as follows: Plaintiffs represent that they have the following types of documents in their possession, custody, and/or control that may support their claims:

1. Documents regarding plaintiffs' transactions in Household securities during the Class Period (October 23, 1997 through October 11, 2002);
2. Publicly available documents concerning Household provided by certain state attorney generals to plaintiffs; and
3. Documents regarding Household obtained from public sources.

Plaintiffs will make available to defendants' counsel those non-privileged, relevant documents that are in their possession, custody or control, and that tend to support plaintiffs' positions in this case. Discovery is likely to reveal additional categories of documents responsive to this subsection. As such, plaintiffs reserve the right to further supplement this portion of the disclosures.

IV. COMPUTATION OF DAMAGES UNDER FED. R. CIV. P. 26(a)(1)(C)

Pursuant to Fed. R. Civ. P. 26(a)(1)(C), plaintiffs respond as follows:

- A. Compensatory Damages: Plaintiffs have not yet determined the full amount of compensatory damages sustained as a result of defendants' conduct and may not be able to do so until after their expert reports are completed.

B. **Plaintiffs' Attorneys' Fees and Costs Incurred in Pursuing this Action:** These fees and costs are being incurred on an ongoing basis, and plaintiffs are presently unable to state the amount of this claim.

C. **Pre-Judgment and Post-Judgment Interests at the Highest Lawful Rate:** Plaintiffs are unable to calculate the amount of pre-judgment and post-judgment interest, as pre-judgment interest is accruing on an ongoing basis, and post-judgment interest will not begin to accrue until after a judgment is obtained.

D. **Other Damages:** Plaintiffs reserve the right to seek other damages in this action.

V. **ANY INSURANCE AGREEMENT WHICH MAY BE LIABLE TO SATISFY ALL OR PART OF A JUDGMENT UNDER FED. R. CIV. P. 26(a)(1)(D)**

Pursuant to Fed. R. Civ. P. 26(a)(1)(D), plaintiffs respond that the information sought by this portion of the Rule is inapplicable to plaintiffs. Plaintiffs are unaware of any insurance agreements, and no such documents have been produced by defendants' counsel thus far.

CERTIFICATION

Pursuant to Fed. R. Civ. P. 26(g), I certify that, to the best of my knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, the disclosure is complete and correct as of the time it is made.

DATED: June 25, 2004

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PATRICK J. COUGHLIN
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Attorneys for Plaintiff

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DECLARATION OF SERVICE BY 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 interest in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on June 25, 2004, declarant served the **PLAINTIFFS' INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)** by depositing a true copy thereof in a United States mailbox at San Francisco, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of June, 2004, at San Francisco, California.



MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 6/25/2004 (02-0377)

Page 1 of 2

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HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 6/25/2004 (02-0377)

Page 2 of 2

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Exhibit 2

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.)	
)
_____)	

**PLAINTIFFS' AMENDED INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(a)(1)**

I. INTRODUCTION

Lead plaintiffs Glickenhau & Company ("Glickenhau"), PACE Industry Union Management Pension Fund ("PACE"), The International Union of Operating Engineers Local No. 132 Pension Plan ("IUOE"), together with named plaintiffs, The Archdiocese of Milwaukee Supporting Fund, Inc. ("AMS Fund") and The West Virginia Laborers' Trust Fund ("West Virginia Fund") (collectively with lead plaintiffs, "plaintiffs") make the following Amended Initial Disclosures to defendants pursuant to Fed. R. Civ. P. 26(a)(1).

Plaintiffs' Amended Initial Disclosures are made without waiver of, or prejudice to, any objections they may have. Plaintiffs expressly reserve all objections, including, but not limited to: (a) relevance; (b) attorney-client privilege; (c) work product protection; (d) privacy; (e) any other applicable privilege or protection under federal or state law; (f) undue burden; (g) materiality; (h) overbreadth; and (i) the admissibility in evidence of these Amended Initial Disclosures or the subject matter thereof.

Discovery is ongoing in this action and may reveal additional documents or additional individuals and/or entities likely to have discoverable information that plaintiffs may use to support their claims. Pursuant to Fed. R. Civ. P. 26(e), plaintiffs reserve the right to clarify, amend, modify or supplement the information contained in these Amended Initial Disclosures from time to time as additional information becomes available.

II. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION UNDER FED. R. CIV. P. 26(a)(1)(A)

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), plaintiffs believe that the following individuals and entities are likely to have discoverable information that plaintiffs may use to support their claims:

A. Plaintiffs

Name	Address/Phone No.	Subjects
James Glickenhau General Partner Glickenhau & Company	c/o Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine St., Ste. 2600 San Francisco, CA 94111 Tel: (415) 288-4545	Purchase / Acquisition of Household International, Inc. ("Household") ¹ securities
Maria Wieck Funds Administrative Manager PACE Industry Union Management Pension Fund	c/o Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine St., Ste. 2600 San Francisco, CA 94111 Tel: (415) 288-4545	Purchase / Acquisition of Household securities
John Nooner Custodian The International Union of Operating Engineers Local No. 132 Pension Plan	c/o Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine St., Ste. 2600 San Francisco, CA 94111 Tel: (415) 288-4545	Purchase / Acquisition of Household securities
Patrick J. Byrne Chief Financial Officer The Archdiocese of Milwaukee Supporting Fund, Inc. and Michael G. Hull Senior Vice President Smith Barney – Citigroup Global Markets	c/o Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine St., Ste. 2600 San Francisco, CA 94111 Tel: (415) 288-4545	Purchase / Acquisition of Household securities
Richard Fredeking The West Virginia Laborers' Trust Fund	c/o Lerach Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine St., Ste. 2600 San Francisco, CA 94111 Tel: (415) 288-4545	Purchase / Acquisition of Household securities

¹ Unless specified otherwise, Household includes all its subsidiaries, including, but not limited to, Household Finance Corporation, Household Realty Corporation and Beneficial Corporation, subsequent to its merger with Household on June 30, 1998.

B. Defendants

Name	Address/Phone No.	Subjects
Household International, Inc. (including all its subsidiaries)	<p>2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000</p> <p>c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605 Tel: (312) 660-7600</p> <p>Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000</p>	<p>Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public</p>

Name	Address/Phone No.	Subjects
		offerings of debt securities identified in the Complaint ² ; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Household Finance Corporation	2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000 c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605 Tel: (312) 660-7600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of

² "Complaint" refers to the [Corrected] Amended Consolidated Class Action Complaint For Violation Of The Federal Securities Laws, filed on March 7, 2003.

Name	Address/Phone No.	Subjects
	<p>Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000</p>	<p>Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
William Aldinger	<p>c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605</p>	<p>Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations;</p>

Name	Address/Phone No.	Subjects
	Tel: (312) 660-7600	Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
	Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000	

Name	Address/Phone No.	Subjects
David Schoenholz	c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605 Tel: (312) 660-7600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances
	Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000	

Name	Address/Phone No.	Subjects
		surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Gary Gilmer	<p>c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605 Tel: (312) 660-7600</p> <p>Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000</p>	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public

Name	Address/Phone No.	Subjects
		offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
J.A. Vozar	c/o Eimer Stahl Klevorn & Solberg 224 South Michigan Ave., Ste. 110 Chicago, IL 60605 Tel: (312) 660-7600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements;
	Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Tel: (212) 530-5000	defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements;

Name	Address/Phone No.	Subjects
		defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Arthur Andersen LLP	c/o Mayer, Brown, Rowe & Maw LLP 190 S. LaSalle St. Chicago, IL 60603-3441 Tel: (312) 782-0600	Household's business, finances and operations and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations and Andersen's knowledge thereof; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; Andersen's audit of and reporting upon Household and HFC financial statements; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans;

Name	Address/Phone No.	Subjects
		Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.

C. Other Persons and Entities

Name	Address/Phone No.	Subjects
Adams, Tamara	1531 Norway Lane, Apt. 1B Palatine, IL 60074 Tel: (847) 404-0278	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Alexander, Suzanne		Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Allshouse, David	814 Heather Place Pittsburgh, PA 15237 Tel: (412) 630-0101	Household's improper and illegal lending practices; Household's collection practices; Household's

Name	Address/Phone No.	Subjects
		arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Alpert, Mark (Deutsche Banc Alex. Brown)	Deutsche Banc Alex. Brown 1 South St., 23rd Floor Baltimore, MD 21202 Tel: (410) 727-1700 Deutsche Banc Alex. Brown 31 West 52nd St. New York, NY 10019 Tel: (212) 469-8000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
<i>American Banker</i>	One State St. Plaza New York, NY 10004 Tel: (212) 803-8200	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
AmeriCredit Corp.	801 Cherry St., Ste. 3900 Fort Worth, TX 76102 Tel: (800) 644-2297	Information relating to the subprime mortgage lending industry.
Ancona, Edgar	c/o Household International 2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
Arrowhead Economic Opportunity Agency (Minnesota)	703 3rd Ave. South Virginia, MN 55792 Tel: (218) 749-2912	Household's business, finances and operations; Household's improper and illegal lending practices.
Associated Press (AP Online)	450 W. 33rd St. New York, NY 10001	Household's business, finances and operations; Household's

Name	Address/Phone No.	Subjects
	Tel: (212) 621-1500	improper and illegal lending practices.
Associates First Capital	250 E. Carpenter Fwy. Irving, TX 75062 Tel: (972) 652-4000	Information relating to the subprime mortgage lending industry.
Association of Community Organizations for Reform Now (ACORN)	83 3rd Ave. Brooklyn, NY 11217 Tel: (718) 246-7900	Household's and HFC's improper and illegal lending practices.
	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	
	Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	
Avila, Cindy		Household's and HFC's improper and illegal lending practices.
Avila, Jose		Household's and HFC's improper and illegal lending practices.
Avila, Joseph	9912 N.76th Lane Peoria, AZ 85345 Tel: (602) 329-1333	Household's and HFC's improper and illegal lending practices.
Bangs, Lawrence N.		Household's improper and illegal lending practices.
<i>Barron's</i>	Dow Jones & Company 200 Liberty St. New York, NY 10281 Tel: (212) 416-2000	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's arbitrary reaging practices and policies and Household's policies relating to the restructuring of delinquent loans; Household's improper accounting of costs

Name	Address/Phone No.	Subjects
		associated with its credit card co-branding, affinity and marketing agreements; the acquisition of Household by HSBC Holdings plc.
Battle, Michael	2034 Stonemont Court Allen, TX 75013 Tel: (214) 495-0020	Household's and HFC's improper and illegal lending practices.
Beckett, Juanita		Household's and HFC's improper and illegal lending practices.
Bell, James	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
Bell, Murelin	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
<i>Bellingham Herald</i>	1155 N. State St. Bellingham, WA 98227 Tel: (630) 676-2600	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
Bennett, Brenda	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Bennett, Carl	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
	Tel: (509) 662-3551	
Blake, Timothy	Household Watch P.O. Box 8244 Redstone Arsenal, AL 35808-0244 Tel: (256) 725-3143	Household's and HFC's improper and illegal lending practices.
Bley, Anne	524 E. 25th Ave Spokane, WA 99203 Tel: (509) 747-5424	Household's and HFC's improper and illegal lending practices.
Bley, Michael	524 E. 25th Ave Spokane, WA 99203 Tel: (509) 747-5424	Household's and HFC's improper and illegal lending practices.
Boudreaux, Cynthia	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Boudreaux, Leon	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Brooks, Charles	2009 201st PI SW Lynnwood, WA 98036 Tel: (425) 774-8376	Household's and HFC's improper and illegal lending practices.
Brooks, Renee	2009 201st PI SW Lynnwood, WA 98036 Tel: (425) 774-8376	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Brown, Emily	6161 Shadow Lane, Apt. #306 Citrus Heights, CA 95621 Tel: (916) 342-0477	Household's and HFC's improper and illegal lending practices.
Brown, Lawrence		Household's and HFC's improper and illegal lending practices.
Brown, Pamela		Household's and HFC's improper and illegal lending practices.
<i>Business Week</i>	The McGraw-Hill Companies 1221 Ave. of the Americas New York, NY 10020 Tel: (212) 512-2000	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
Byers, Fredrick	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255 5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Byers, Sonya	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Byington, Edith		Household's and HFC's improper and illegal lending

Name	Address/Phone No.	Subjects
		practices.
Cabral, Lisa	1900 No. 33rd Place Mount Vernon, WA 98273 Tel: (360) 424-5381	Household's and HFC's improper and illegal lending practices.
Cabral, Mark	1900 No. 33rd Place Mount Vernon, WA 98273 Tel: (360) 424-5381	Household's and HFC's improper and illegal lending practices.
California Congress of Seniors	1228 N St., #30 Sacramento, CA 95814 Tel: (800) 543-3352	Household's and HFC's improper and illegal lending practices.
California Department of Corporations	1515 K St., Ste. 200 Sacramento, CA 95814-4052 Tel: (916) 445-7205	Household's and HFC's improper and illegal lending practices.
California Reinvestment Committee	474 Valencia St., Ste. 110 San Francisco, CA 94103 Tel: (415) 864-3980	Household's and HFC's improper and illegal lending practices.
Callander, Robert J.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Campana, Tina M.	c/o Luper, Neidenthal & Logan A Legal Professional Association 50 West Broad St., Ste. 1200 Columbus, OH 43215 Tel: (614) 221-7663	Household's and HFC's improper and illegal lending practices.
Caspersen, Finn M. W.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Center for Community Change	1000 Wisconsin Ave. NW Washington DC 20007	Household's and HFC's improper and illegal lending

Name	Address/Phone No.	Subjects
	Tel: (202) 342-0519	practices.
Chaffins, Leanna	3601 Allen Parkway, Apt. #75 Houston, TX 77019 Tel: (281) 610-5484	Household's and HFC's improper and illegal lending practices.
Cho, Angela	Washington Department of Financial Institutions 150 Israel Road Tumwater, WA 98501 Tel: (360) 902-8700	Household's and HFC's improper and illegal lending practices.
Christian Science Monitor	One Norway St. Boston, MA 02115 Tel: (617) 450-2000	Household's business, finances and operations; Household's lending practices; defendants' false and misleading statements relating to Household's business, finances and operations.
CIO magazine	CXO Media 429 Old Connecticut Path Framingham, MA 01701 Tel: (508) 872-0080	Household's business, finances and operations and Household's Vision system.
Clark, Robert C.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Clay, Billy W.	2643 FM 543 McKinney, TX 75071 Tel: (972) 562-6725	Household's and HFC's improper and illegal lending practices.
Clay, Delores	2643 FM 543 McKinney, TX 75071 Tel: (972) 562-6725	Household's and HFC's improper and illegal lending practices.
Coburn, Michelle	718 North Negley Ave., Apt. #5 Pittsburgh, PA 15206 Tel: (412) 227-1013	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's

Name	Address/Phone No.	Subjects
		policies relating to the restructuring of delinquent loans.
Cocoa, Alma	11312 Forest Drive Thornton, CO 80233-2868 Tel: (303) 450-7598	Household's and HFC's improper and illegal lending practices.
Colby, Pecola L.		Household's and HFC's improper and illegal lending practices.
Cole, Jaime		Household's and HFC's improper and illegal lending practices.
Coleman, Leonard S., Jr.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Colgan, John	176 Bristol Rd. SW Reynoldsburg, OH 43068 Tel: (740) 964-3585	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Community Action Committee of the Lehigh Valley (Pennsylvania)	1337 East Fifth St. Bethlehem, PA 18015 Tel: (610) 691-5620	Household's and HFC's improper and illegal lending practices.
Connell, Jerry		Household's and HFC's improper and illegal lending practices.
Connell, Linda		Household's and HFC's improper and illegal lending practices.
Consumers Union	101 Truman Ave.	Household's and HFC's

Name	Address/Phone No.	Subjects
	Yonkers, NY 10703-2000 Tel: (914) 378-2000	improper and illegal lending practices.
ContiFinancial	Boston Portfolio Advisors 500 W. Cypress Creek Road, Ste. 230 Fort Lauderdale, FL 33309 Tel: (954) 938-3000	Information relating to the subprime mortgage lending industry.
<i>Contra Costa Times</i>	2640 Shadelands Drive Walnut Creek, CA 94598-2578 Tel: (925) 935-2525	Household's business, finances and operations; Household's improper and illegal lending practices.
Copley News Service	The Copley Press, Inc. 7776 Ivanhoe Ave. La Jolla, CA 92037 Tel: (858) 454-0411	Household's business, finances and operations; Household's improper and illegal lending practices.
Coren, S. (Bear Stearns)	c/o Bear Stearns Worldwide Headquarters 383 Madison Ave. New York, NY 10179 Tel: (212) 272-2000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Cossetti, Claudia	1212 Parkway Ct. Greenacres, FL 33413 Tel: (561) 649-0665	Household's and HFC's improper and illegal lending practices.
Coy, Elizabeth	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
Coy, Gary	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
Cross, Chuck	Washington Department of Financial Institutions 150 Israel Road Turnwater, WA 98501 Tel: (360) 902-8700	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Darnall, Robert J.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive

Name	Address/Phone No.	Subjects
		compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Davis, Mary	21407 S.E. 258th St. Maple Valley, WA 98038 Tel: (425) 351-6239	Household's and HFC's improper and illegal lending practices.
Davis, Reed	21407 S.E. 258th St. Maple Valley, WA 98038 Tel: (425) 351-6239	Household's and HFC's improper and illegal lending practices.
Detelich, Thomas	c/o Household International 2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000	Household's and HFC's improper and illegal lending practices.
Dillon, Gary G.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of

Name	Address/Phone No.	Subjects
		Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Dockery, Darlene	5081 Glenwood Way Virginia Beach, VA 23456 Tel: (757) 589-0100	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Dodge, Cory	606 B St. Blaine, WA 98230 Tel: (360) 332-0994	Household's and HFC's improper and illegal lending practices.
Dodge, Jennifer	606 B St. Blaine, WA 98230 Tel: (360) 332-0994	Household's and HFC's improper and illegal lending practices.
Donohue, Matthew	16 Sheldon Dr. Poughkeepsie, NY 12533	Household's and HFC's business, finances and

Name	Address/Phone No.	Subjects
	Tel: (845) 473-1529	operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Duff & Phelps Credit Rating Co.	55 East Monroe St. Chicago, IL 60603 Tel: (312) 368-3100	Household's business, operations and finances and credit rating.
Dyche, Jared	461 Lily Rd. London, KY 40744 Tel: (606) 682-3333	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Eden, Kutr	1614 Indain Mt. Lakes Albrightsville, PA 18210 Tel: (570) 646-8807	Household's and HFC's improper and illegal lending practices.
Edwardson, John A.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement

Name	Address/Phone No.	Subjects
		<p>of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
Emerson, Tracy		Household's and HFC's improper and illegal lending practices.
Etheridge, Cheryl	2810 Colonial Ave, Apt. 2 Norfolk, VA 23508 Tel: (757) 623-7378	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.

Name	Address/Phone No.	Subjects
Fabiano, Rocco J		Household's and HFC's improper and illegal lending practices; Household's and HFC's business, finances and operations.
Farris, David J.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Fenton, Debra	5334 Tenneson Rd Sedro Woolley, WA 98284 Tel: (630) 856-6119	Household's and HFC's improper and illegal lending practices.
Fenton, Marty	5334 Tenneson Rd Sedro Woolley, WA 98284 Tel: (630) 856-6119	Household's and HFC's improper and illegal lending practices.
Fishburn, Dudley	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme

Name	Address/Phone No.	Subjects
		to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Fitch	One State St. Plaza New York, NY 10004 Tel: (212) 908-0500	Household's business, operations and finances and credit rating.
<i>Forbes</i>	60 Fifth Ave. New York, NY 10011	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
Foreclosure Prevention Project (New York)	South Brooklyn Legal Services 105 Court St. Brooklyn, NY 11201 Tel: (718) 237-5000	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Fort Knox National Bank	601 W. Lincoln Trail Blvd. Radcliff, KY 40160-2601 Tel: (207) 351-3151	Household's and HFC's improper and illegal lending practices.
Foster, Morris	1064 Greentree Parkway Macon, GA 31220 Tel: (478) 475-0753	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Freidheim, Cyrus F., Jr.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-

Name	Address/Phone No.	Subjects
		branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Frost, Michael L.	c/o Luper, Neidenthal & Logan A Legal Professional Association 50 West Broad St., Ste. 1200 Columbus, OH 43215 Tel: (614) 221-7663	Household's and HFC's improper and illegal lending practices.
Galindo, Corina		Household's and HFC's improper and illegal lending practices.
Gallagher, Colleen	2523 John Eppes Road #304 Herndon, VA 20171 Tel: (571) 643-0653	Household's and HFC's improper and illegal lending practices.
Gibson, Greg		Household's and HFC's improper and illegal lending practices.
Golden, Thomas	624 Harvest Drive Dallastown, PA 17313 Tel: (717) 244-1324	Household's and HFC's improper and illegal lending practices.
Goldman Sachs & Co., Inc.	c/o Sidley Austin Brown & Wood Bank One Plaza 10 South Dearborn Street Chicago, Illinois 60603	Household's and HFC's business, finances, operations and Beneficial's business, finances, operations; information relating to the acquisition of

Name	Address/Phone No.	Subjects
	Tel: (312) 853-7000 Simpson Thacher & Bartlett 425 Lexington Avenue New York, NY 10017-3954 Tel: (212) 455-2000	Beneficial by Household.
Gomberg, Joel	c/o William Blair & Co., L.L.C. 222 West Adams St. Chicago, IL 60606 Tel: (312) 236-1600	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Grant, Rachel	Office of the Attorney General of the State of Washington P.O. Box 40100 1125 Washington Street, SE Olympia, WA 98504-0100 Tel: (360) 753-6200	Household's and HFC's improper and illegal lending practices.
Greater Rochester Community Reinvestment Coalition	80 St. Paul St., Ste. 701 Rochester, NY 14604 Tel: (585) 454-4060	Household's and HFC's improper and illegal lending practices.
Greenlining Institute	1918 University Ave., 2nd Floor Berkeley, CA 94704 Tel: (510) 926-4000	Household's and HFC's improper and illegal lending practices.
Guzman, Juan	221 W. Cole St. Tel: (253) 856-7372	Household's and HFC's improper and illegal lending practices.
Guzman, Maria		Household's and HFC's improper and illegal lending practices.
Hall, Jason	303 Annhurst Drive Danville, VA 24540 Tel: (434) 728-5145	Household's and HFC's improper and illegal lending practices.
Halvorsen, Andrew C.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations;

Name	Address/Phone No.	Subjects
		Household's lending practices; Beneficial's lending practices.
Hanley, Thomas	Warburg Dillon Read 299 Park Ave. New York, NY 10171 Tel: (212) 821-3000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Harvey, Ken	c/o Household International 2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000	Household's and HFC's business, operations and finances; Household's Vision System; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and policies relating to the restructuring of delinquent loans.
Hayden, Megan	c/o Household International 2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000	Household's and HFC's business, finances and operations, and defendants knowledge thereof; Household's improper, abusive and illegal lending practices; defendants' false and misleading statements relating to Household's business, finances and operations and Household's lending practices.
Hendrickson, Lora		Household's and HFC's improper and illegal lending practices.
Hendrix, D.	Friedman, Billings, Ramsey & Co. FBR Headquarters 1001 Nineteenth St. North Arlington, VA 22209 Tel: (703) 312-9500	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Hernandez, Roland A.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's

Name	Address/Phone No.	Subjects
		business, finances, operations; Household's lending practices; Beneficial's lending practices.
Hillier, J. Robert	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Hinson, Reginald	8236 Kanter Ave. Norfolk, VA 23518 Tel: (757) 623-0526	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Hochstim, D.	c/o Bear Stearns 383 Madison Ave New York, NY 10179 Tel: (212) 272-2000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Hocfle, George	6645 West Rose Garden Lane Glendale, AZ 85308 Tel: (630) 918-9417	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.

Name	Address/Phone No.	Subjects
Holm, Gerald L	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
<u>Howard, Jada</u>		Household's and HFC's improper and illegal lending practices.
HSBC Holdings plc	HSBC Holdings plc 8 Canada Square London E14 5HQ Tel: (440) 20 7991 8888	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; the circumstances surrounding Household's engagement of KPMG, LLP relating to both audit and non- audit work; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co- branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive

Name	Address/Phone No.	Subjects
		compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Hueman, Dennis		Household's and HFC's business, finances, operations; Household's improper and illegal lending practices; Household's training relating to its improper and illegal lending practices.
Hulsey, Norma	524 Miller Creek Ct. Azle, TX 76020 Tel: (817) 488-8781	Household's and HFC's improper and illegal lending practices.
Hulsey, Thomas A.	524 Miller Creek Ct. Azle, TX 76020 Tel: (817) 488-8781	Household's and HFC's improper and illegal lending practices.
Indiana Department of Insurance and Financial Institutions	30 South Meridian St., Ste. 300 Indianapolis, IN 46204 Tel: (317) 232-3955	Household's and HFC's improper and illegal lending practices.
J.P. Morgan	60 Wall St. New York, NY 10005	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Jackson, Timothy	3343 Peachtree Corners Circle Unit I Norcross, GA 30092 Tel: (770) 242-2999	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
James Bernstein (former Minnesota Commissioner of Commerce)	5216 Ewing Ave South #204 Minneapolis, MN 55410	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Johnston, Mary B.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances

Name	Address/Phone No.	Subjects
		surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Johnston, Julian	220 Sudden Valley Bellingham, WA 98226 Tel: (360) 671-7679	Household's and HFC's improper and illegal lending practices.
Johnston, Terry	220 Sudden Valley Bellingham, WA 98226 Tel: (360) 671-7679	Household's and HFC's improper and illegal lending practices.
Jones, Annie		Household's and HFC's improper and illegal lending practices.
Jordan, Beulah		Household's and HFC's improper and illegal lending practices.
Kahre, Eileen	1255 Orcutt Road, B-23 San Luis Obispo, CA 93401 Tel: (805) 544-8577	Household's and HFC's improper and illegal lending practices.
Kean, Thomas H.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Kellogg, Jennifer		Household's and HFC's improper and illegal lending practices.
Kelly, Jeffrey	220 Cameron Drive Irwin, PA 15642 Tel: (724) 863-0504	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.

Name	Address/Phone No.	Subjects
KPMG LLP	345 Park Ave. New York, NY 10154-0102 Tel: (212) 758-9700	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; Andersen's audit of and reporting upon Household and HFC financial statements; KPMG's audit of and reporting upon Household and HFC financial statements; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other

Name	Address/Phone No.	Subjects
		benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Kwidzinski, Bruce		Household's and HFC's improper and illegal lending practices.
Lane, David II	3990 Spring Valley Rd. #516 Farmers Branch, TX 75244 Tel: (972) 382-4060	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Lemmon, Jared	Office of the Attorney General of the State of Washington Consumer Protection Division P.O. Box 40100 1125 Washington Street, SE Olympia, WA 98504-0100 Tel: (360) 753-6200	Household's and HFC's improper and illegal lending practices.
Lester, Robert.	8712 N. Magnolia Ave #227 Santee, CA 92071 Tel: (916) 749-4033	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Levy, Louis E.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants'

Name	Address/Phone No.	Subjects
		<p>engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
Lewis, Joe		Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Long Island Housing Services, Inc.	3900 Veterans Memorial Highway, Ste. 251 Bohemia, NY 11716 Tel: (631) 467-5111	Household's and HFC's improper and illegal lending practices.
Lorch, George A.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public

Name	Address/Phone No.	Subjects
		offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Lower East Side People's Federal Credit Union (New York)	37 Ave. B New York, NY 10009 Tel: (212) 529-8197	Household's and HFC's improper and illegal lending practices.
Luna, Jeanie	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Luna, Joseph	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Lundquist, Jami	19716 5th Ave NE Arlington, WA 98223 Tel: (360) 652-4165	Household's and HFC's improper and illegal lending practices.
Lundquist, Justin	19716 5th Ave NE Arlington, WA 98223 Tel: (360) 652-4165	Household's and HFC's improper and illegal lending practices.
MacDonald, John	UBS Warburg LLC 1285 Ave. of the Americas New York, NY 10019 Tel: (212) 713-2000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Madura, Carla		Household's and HFC's improper and illegal lending practices.
Malarkey, Susannah		Household's and HFC's

Name	Address/Phone No.	Subjects
		improper and illegal lending practices.
Marco, William	6239 W. Birmingham St., Apt. #3E Chicago Ridge, IL 60415 Tel: (708) 423-6963	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Marshall, Chad	11926 Sonora Springs Dr Tomball, TX 77375 Tel: (281) 255-8868	Household's and HFC's improper and illegal lending practices.
Martin, Ross	2936 W. 100 St. Evergreen Park, IL 60805 Tel: (708) 422-8714	Household's and HFC's improper and illegal lending practices.
Mason, Robert L.		Household's and HFC's improper and illegal lending practices.
Mayes, Thomas	2148 Gardner Circle East Aurora, IL 60504 Tel: (630) 499-9120	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
MBNA Consumer Services Inc.	1100 North King St. Wilmington, DE 19884-0131 Tel: (302) 453-9930	Household's business, finances and operations; Household's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Mehta, Bobby		Household's and HFC's business, operations and finances; Household's improper and illegal lending practices; Household's collection practices; Household's financial statements audited and reported upon by Andersen; Household's August 14, 2002 restatement.
Merrill Lynch, Pierce, Fenner & Smith, Inc	c/o Sidley Austin Brown & Wood Bank One Plaza 10 South Dearborn Street Chicago, Illinois 60603 Tel: (312) 853-7000 Simpson Thacher & Bartlett 425 Lexington Avenue New York, NY 10017-3954 Tel: (212) 455-2000	Household's and HFC's business, finances, operations and Beneficial's business, finances, operations; information relating to the acquisition of Beneficial by Household.
Merryman, Michele	9623 S. 248th St., B-4 Kent, WA 98030 Tel: (235) 859-0429	Household's and HFC's improper and illegal lending practices.
Metropolitan Council of the New York State Conference of the NAACP	New York State Conference of NAACP Branches 39 Broadway - 22nd Floor New York, NY 10006 Tel: (212) 344-7474	Household's and HFC's improper and illegal lending practices.
Mielitz, Doug		Household's business, finances and operations; Household's improper and illegal lending practices.
Moonwind, Joleen A.K.	13205 SE 260th Ln Kent, WA 98042 Tel: (253) 639-6220	Household's and HFC's improper and illegal lending practices.
Moore, Betty J.	26435 NE Penn Ave P.O. Box 1670 Kingston, WA 98346 Tel: (360) 297-4302	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Moore, James		Household's and HFC's improper and illegal lending practices.
Moore, Timothy	26435 NE Penn Ave P.O. Box 1670 Kingston, WA 98346 Tel: (360) 297-4302	Household's and HFC's improper and illegal lending practices.
Muller, Steven	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Murphy, David J.	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Myers, William		Household's and HFC's improper and illegal lending practices.
Napoli, R.	ABN AMRO Incorporated Park Avenue Plaza 55 East 52 Street New York, NY 10055 Tel: (212) 409-1000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
National Consumer Law Center	77 Summer St., 10th Floor Boston, MA 02110-8010 Tel: (617) 542-8010	Household's and HFC's improper and illegal lending practices.
<i>National Mortgage News</i>	One State St. Plaza, 27th Floor New York, NY 10004 Tel: (212) 803-8226	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.

Name	Address/Phone No.	Subjects
Neal, Geniva	2925 Harold Court Alvarado, TX 76009 Tel: (817) 723-1835	Household's and HFC's improper and illegal lending practices.
Nelson, Cheryl	2635 Dogwood St. Auburn, WA 98092 Tel: (253) 939-9861	Household's and HFC's improper and illegal lending practices.
Nelson, Elsie L.	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Nelson, Mark	2635 Dogwood St. Auburn, WA 98092 Tel: (253) 939-9861	Household's and HFC's improper and illegal lending practices.
Nelson, Neil	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.
Newman, Sally	P.O. Box 8122 Norfolk, VA 32256 Tel: (757) 342-3979	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Nguyen, Jackie		Household's and HFC's improper and illegal lending practices.
Nichols, John D. (director)	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants'

Name	Address/Phone No.	Subjects
		<p>engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
Nolan, Bill		Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Odoi, Sam	46 Snapdragon Court Romeville, IL 60446 Tel: (815) 372-0357	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Oleson, Leia		Household's and HFC's improper and illegal lending practices.
Oliver, Judy		Household's and HFC's improper and illegal lending practices.
Olson-Murphy, James		Household's and HFC's improper and illegal lending practices.
Osborn, Jeffrey	7957 Santa Fe Tr. Maple Falls, WA 98266 Tel: (360) 599-2732	Household's and HFC's improper and illegal lending practices.
Osborn, Mildred	7957 Santa Fe Tr. Maple Falls, WA 98266 Tel: (360) 599-2732	Household's and HFC's improper and illegal lending practices.
Osmulski, Kerri		Household's and HFC's improper and illegal lending practices.
Patel, Mina	8833 Washington St. Niles, IL 60714 Tel: (847) 470-8591	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and

Name	Address/Phone No.	Subjects
		policies and policies relating to the restructuring of delinquent loans.
Paul, Brian P.		Household's and HFC's improper and illegal lending practices.
Paul, Cheryl A.	809 NW 4th Camas, WA 98607 Tel: (360) 834-3253	Household's and HFC's improper and illegal lending practices.
Pecheos, Sue S.	226 Blossom Drive. P.O. Box 369 Moxee, WA 98936 Tel: (509) 452-6278	Household's and HFC's improper and illegal lending practices.
Pemberton, Arthur A.	P.O. Box 4491 Bremerton, WA 98312 Tel: (360) 479-1164	Household's and HFC's improper and illegal lending practices.
Pemberton, Gay M.	P.O. Box 4491 Bremerton, WA 98312 Tel: (360) 479-1164	Household's and HFC's improper and illegal lending practices.
Peters, Doreen		Household's and HFC's improper and illegal lending practices.
Pickett, Kathy		Household's and HFC's improper and illegal lending practices.
Pitblado, James B.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances

Name	Address/Phone No.	Subjects
		<p>surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
Pitsinger, Todd A.	Friedman, Billings, Ramsey & Co. FBR Headquarters 1001 Nineteenth St. North Arlington, VA 22209 Tel: (703) 312-9500	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.

Name	Address/Phone No.	Subjects
Poling, Brandy	3631 N. Cool Rd. Lima, OH 45801 Tel: (419) 643-5646	Household's and HFC's improper and illegal lending practices.
Providian Financial Corp.	201 Mission St. San Francisco, CA 94105 Tel: (415) 543-0404	Information relating to the subprime mortgage lending industry.
Ramirez, Alex	210 W. Vermont Ave. #204 Escondido, CA 92025 Tel: (760) 745-0973	Household's and HFC's improper and illegal lending practices.
Responsible Wealth Project of United for a Fair Economy	37 Temple Place, 2nd Floor Boston, MA 02111 Tel: (617) 423-2148	Household's and HFC's improper and illegal lending practices.
Reyes, Irene	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
Hoffman & Lazear, Attorneys	180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Reyes, Julio	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Reynolds, Stacey		Household's and HFC's improper and illegal lending practices.
Robertson, Regina C.	4902 Country Club Dr. High Ridge, MO 63049 Tel: (636) 677-0165	Household's and HFC's improper and illegal lending practices.
Robinson, Josephine	12275 Claude Court #726	Household's and HFC's

Name	Address/Phone No.	Subjects
	Northglenn, CO 80241 Tel: (303) 885-2790	improper and illegal lending practices.
Robinson, Rebecca	12275 Claude Court, #276 North Glenn, CO 80241 Tel: (303) 255-4001	Household's and HFC's improper and illegal lending practices.
Ross, Susan Julia	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Rutland-Drury, Melissa	c/o Andrea Brenneke MacDonald Hoague & Bayless 1500 Hoge Building 705 Second Ave. Seattle, WA 98104-1745 Tel: (206) 622-1604	Household's business, finances and operations; Household's improper and illegal lending practices.
Schneider, Tom	c/o Household International, Inc. 2700 Sanders Road Prospect Heights, IL 60070 Tel: (847) 564-5000	Household's business, finances and operations; Household's improper and illegal lending practices.
Scutti, Jennifer	Prudential Securities Wachovia Securities, LLC 901 East Byrd St. Richmond, VA 23219	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Seaton, Victor	330 Riviera Lane Johnstown, CO 80534 Tel: (970) 587-2664	Household's and HFC's improper and illegal lending practices.
Shiba, Donald		Household's and HFC's improper and illegal lending practices.
Smart, Georgia	c/o Robert L. Parlette Davis, Arneil Law Firm, LLP 617 Washington St. Wenatchee, WA 98801 Tel: (509) 662-3551	Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Smartt, Symeria	4520 S. Woodlawn Ave Chicago, IL 60653 Tel: (773) 548-7428	Household's and HFC's business, finances and operations; Household's marketing programs information; defendants' improper accounting relating to Household's business.
Smith, David	15318 West Doll Lane Surprise, AZ 85374 Tel: (623) 556-0209	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Smith, Jaime		Household's and HFC's improper and illegal lending practices.
Smith, Jerry		Household's and HFC's improper and illegal lending practices.
Smith, Jr., Joseph A.	316 W. Edenton Street, Raleigh, NC 27603 Tel: (919) 733-3016	Household's and HFC's improper and illegal lending practices.
Sochol, David	Legg Mason, Inc. 100 Light St. Baltimore, MD 21202-1099 Tel: (877) 534-4627	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
South Brooklyn Legal Services	105 Court St. Brooklyn, NY 11201 Tel: (718) 237-5500	Household's and HFC's improper and illegal lending practices.
Spasov, Teri		Household's and HFC's improper and illegal lending practices.

Name	Address/Phone No.	Subjects
Speller, Kedra	3505 Scott St. Portsmouth, VA 23707 Tel: (757) 399-4577	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
<i>Star-Tribune</i>	425 Portland Ave. Minneapolis, MN 55488 Tel: (612) 673-4000	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
Offices of the State Attorney's General and/or state financial regulators involved in the multi-state settlement with Household and Beneficial Corporation of predatory lending charges	Troy King Attorney General of Alabama State House, 11 S. Union St. Montgomery, AL 36130 Tel: (334) 242-7300	Household's and HFC's improper and illegal lending practices.
	Gregg Renkes Attorney General of Alaska P.O.Box 110300 Diamond Courthouse Juneau, AK 99811-0300 Tel: (907) 465-3600	
	Terry Goddard Attorney General of Arizona 1275 W. Washington St. Phoenix, AZ 85007 Tel: (602) 542-5025	
	Mike Beebe Attorney General of Arkansas 200 Tower Bldg., 323 Center St. Little Rock, AR 72201-2610 Tel: (800) 482-8982	
	Bill Lockyer Attorney General of California 1300 I St., Ste. 1740,	

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	Richard Blumenthal Attorney General of Connecticut 55 Elm St. Hartford, CT 06141-0120 Tel: (860) 808-5318	
	M. Jane Brady Attorney General of Delaware Carvel State Office Bldg. 820 N. French St. Wilmington, DE 19801 Tel: (302) 577-8400	
	Robert J. Spagnoletti Attorney General of the District of Columbia Office of the Corporation Counsel 441 4th St., NW Washington, DC 20001 Tel: (202) 724-1305	
	Charlie Crist Attorney General of Florida The Capitol, PL 01 Tallahassee, FL 32399-1050 Tel: (850) 245-0140	
	Thurbert E. Baker Attorney General of Georgia 40 Capitol Square, SW Atlanta, GA 30334-1300 Tel: (404) 656-3300	
	Mark J. Bennett Attorney General of Hawaii 425 Queen St.	

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	Honolulu, HI 96813 Tel: (808) 586-1500	
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	Lisa Madigan Attorney General of Illinois James R. Thompson Ctr., 100 W. Randolph St. Chicago, IL 60601 Tel: (312) 814-3000	
	Steve Carter Attorney General of Indiana Indiana Government Center South - 5th Floor 302 West Washington St. Indianapolis, IN 46204 Tel: (317) 232-6201	
	Tom Miller Attorney General of Iowa Hoover State Office Bldg., 1305 E. Walnut Des Moines, IA 50319 Tel: (515) 281-5164	
	Phill Kline Attorney General of Kansas 120 S.W. 10th Ave., 2nd Fl. Topeka, KS 66612-1597 Tel: (785) 296-2215	
	Gregory D. Stumbo Attorney General of Kentucky State Capitol, Ste. 118 Frankfort, KY 40601 Tel: (502) 696-5300	
	Charles C. Foti, Jr. Attorney General of Louisiana Dept. of Justice, P.O.Box 94095	

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	Baton Rouge, LA 70804-9095 Tel: (225) 326-6000	
	G. Steven Rowe Attorney General of Maine State House Station 6 Augusta, ME 04333 Tel: (207) 626-8800	
	J. Joseph Curran Jr. Attorney General of Maryland 200 St. Paul Place Baltimore, MD 21202-2202 Tel: (410) 576-6300	
	Tom Reilly Attorney General of Massachusetts 1 Ashburton Place Boston, MA 02108-1698 Tel: (617) 727-2200	
	Mike Cox Attorney General of Michigan P.O.Box 30212 525 W. Ottawa St. Lansing, MI 48909-0212 Tel: (517) 373-1110	
	Mike Hatch Attorney General of Minnesota State Capitol, Ste. 102 St. Paul, MN 55155 Tel: (800) 657-3787	
	Jim Hood Attorney General of Mississippi Dept. of Justice, P.O.Box 220 Jackson, MS 39205-0220 Tel: (601) 359-3680	
	Jeremiah W. Nixon Attorney General of Missouri Supreme Ct. Bldg. 207 W. High St. Jefferson City, MO 65101	

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	Tel: (573) 751-3321	
	Mike McGrath Attorney General of Montana Justice Building, 215 N. Sanders Helena, MT 59620-1401 Tel: (406) 444-2026	
	Jon Bruning Attorney General of Nebraska 2115 State Capitol P.O.Box 98920 Lincoln, NE 68509-8920 Tel: (402) 471-2682	
	Brian Sandoval Attorney General of Nevada 100 N. Carson St. Carson City, NV 89701 Tel: (775) 684-1100	
	Peter Heed Attorney General of New Hampshire 33 Capitol St. Concord, NH 03301-6397 Tel: (603) 271-3658	
	Peter C. Harvey Attorney General of New Jersey Richard J. Hughes Justice Complex 25 Market St., P.O. Box 080 Trenton, NJ 08625 Tel: (609) 292-8740	
	Patricia A. Madrid Attorney General of New Mexico P.O. Drawer 1508 Sante Fe, NM 87504-1508 Tel: (505) 827-6000	
	Eliot Spitzer Attorney General of New York Dept. of Law - The Capitol, 2nd Fl.	

Name	Address/Phone No.	Subjects
	Albany, NY 12224 Tel: (518) 474-7330	
	Roy Cooper Attorney General of North Carolina Dept. of Justice, P.O. Box 629 Raleigh, NC 27602-0629 Tel: (919) 716-6400	
	Wayne Stenejem Attorney General of North Dakota State Capitol, 600 E. Boulevard Ave. Bismarck, ND 58505-0040 Tel: (701) 328-2210	
	Jim Petro Attorney General of Ohio State Office Tower, 30 E. Broad St. Columbus, OH 43215-3428 Tel: (614) 466-4320	
	W. A. Drew Edmondson Attorney General of Oklahoma State Capitol, Rm. 112 2300 N. Lincoln Blvd. Oklahoma City, OK 73105 Tel: (405) 521-3921	
	Hardy Myers Attorney General of Oregon Justice Bldg., 1162 Court St., NE Salem, OR 97301-4096 Tel: (503) 378-4400	
	Gerald J. Pappert Attorney General of Pennsylvania 1600 Strawberry Square Harrisburg, PA 17120 Tel: (717) 787-3391	
	Patrick Lynch	

Name	Address/Phone No.	Subjects
	Attorney General of Rhode Island 150 S. Main St. Providence, RI 02903 Tel: (401) 274-4400	
	Henry McMaster Attorney General of South Carolina Rembert C. Dennis Office Bldg. P.O.Box 11549 Columbia, SC 29211-1549 Tel: (803) 734-3970	
	Larry Long Attorney General of South Dakota 500 E. Capitol Pierre, SD 57501-5070 Tel: (605) 773-3215	
	Paul G. Summers Attorney General of Tennessee 500 Charlotte Ave. Nashville, TN 37243 Tel: (615) 741-5860	
	Greg Abbott Attorney General of Texas Capitol Station, P.O.Box 12548 Austin, TX 78711-2548 Tel: (512) 463-2100	
	Mark Shurtleff Attorney General of Utah P.O. Box 142320 Salt Lake City, UT 84114-2320 Tel: (801) 538-9600	
	William H. Sorrell Attorney General of Vermont 109 State St. Montpelier, VT 05609-1001 Tel: (802) 828-3173	
	Jerry Kilgore	

Name	Address/Phone No.	Subjects
	Attorney General of Virginia 900 E. Main St. Richmond, VA 23219 Tel: (804) 786-2071	
	Christine O. Gregoire Attorney General of Washington P.O.Box 40100 1125 Washington St., SE Olympia, WA 98504-0100 Tel: (360) 753-6200	
	Darrell Vivian McGraw Jr. Attorney General of West Virginia State Capitol, 1900 Kanawha Blvd. E., Charleston, WV 25305 Tel: (304) 558-2021	
	Peg Lautenschlager Attorney General of Wisconsin 114 East - State Capitol Madison, WI 53702 Tel: (608) 266-1221	
	Pat Crank Attorney General of Wyoming 123 State Capitol Bldg. Cheyenne, WY 82002 Tel: (307) 777-7841	
Stewart, S. Jay	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances

Name	Address/Phone No.	Subjects
		<p>surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.</p>
Stroom, Craig		<p>Household's and HFC's business, finances and operations, and defendants knowledge thereof; Household's improper, abusive and illegal lending practices; defendants' false and misleading statements</p>

Name	Address/Phone No.	Subjects
		relating to Household's business, finances and operations and Household's lending practices.
Sullivan, Louis W.	c/o Winston & Strawn 35 West Wacker Drive Chicago, Illinois 60601 Tel: (312) 558-5600	Household's business, finances and operations, and defendants' knowledge thereof; accounting practices relating to Household's business, finances and operations; Household's engagement of Andersen relating to the audit and reporting of Household and/or HFC financial statements; defendants' engagement of Andersen related to non-audit and consulting work; the circumstances surrounding the termination of Household's engagement of Andersen in 2002 relating to both audit and non-audit or consulting work; Household's engagement of KPMG, LLP relating to both audit and non-audit work; defendants' scheme to artificially inflate the earnings of Household; defendants' scheme to artificially inflate the price of Household's securities; Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging practices and policies regarding restructuring of delinquent loans; Household's improper accounting of costs associated with its credit card co-branding, affinity and marketing agreements; defendants' false and misleading statements relating to Household's business, finances and operations; Household's securitization of its loan pools to raise capital; public offerings of debt securities

Name	Address/Phone No.	Subjects
		identified in the Complaint; defendants' executive compensation, bonuses and other benefits; the circumstances surrounding the sale of Household to HSBC Holdings plc; and/or any other undisclosed arrangements between defendants.
Swanberg, G.	c/o Deutsche Banc Alex Brown 31 West 52nd St. New York, NY 10019 Tel: (212) 469-8000	Household's and HFC's business, finances and operations and information relating to the subprime mortgage lending industry.
Swanson, David	c/o ACORN 83 3rd Ave. Brooklyn, NY 11217 Tel: (718) 246-7900	Household's and HFC's improper and illegal lending practices.
Tapia, Maria	377 North Cedar Wood Dale, IL 60191 Tel: (630) 766-9241	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
<i>The Record</i>	150 River St. Hackensack, NY 07601-7172 Tel: (201) 646-4100	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating to restructuring of delinquent loans.
<i>The Wall St. Journal</i>	Dow Jones & Company 200 Liberty St. New York, NY 10281 Tel: (212) 416-2000	Household's business, finances and operations; Household's lending practices; Household's collection practices; Household's reaging policies and practices and Household's policies relating

Name	Address/Phone No.	Subjects
		to restructuring of delinquent loans.
Torres, Julie	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200 Hoffman & Lazear, Attorneys 180 Grand Ave., Ste. 1550 Oakland, CA 94612 Tel: (510) 763-5700	Household's and HFC's improper and illegal lending practices.
Trojanowski, Jack		Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Tucker, Robert A	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Tull, Marc	c/o Terry Wallace, Esq. P.O. Box 18765 Denver, CO 80218-0765 Tel: (303) 832-7861	Household's and HFC's improper and illegal lending practices.
Turner, Corey	713 Gemstone Lane Virginia Beach, VA 23462 Tel: (757) 490-7923	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and

Name	Address/Phone No.	Subjects
		practices and Household's policies relating to the restructuring of delinquent loans.
Vega, Mireya	c/o Miner, Barnhill & Galland, P.C. 44 East Mifflin St., Ste. 803 Madison, WI 53703 Tel: (608) 255-5200	Household's and HFC's improper and illegal lending practices.
Wachter, Susan M.	c/o McDermott Will & Emery 227 West Monroe Street Chicago, Illinois 60606-5096 Tel: (312) 372-2000	Household's and HFC's business, finances, operations and Household defendants' knowledge thereof; Beneficial's business, finances, operations; Household's lending practices; Beneficial's lending practices.
Walsh, Robert	City Hall 45 Lyon Terrace Bridgeport, CT 06604 (203) 576-7081	Household's and HFC's improper and illegal lending practices.
Washington Department of Financial Institutions	150 Israel Road Tumwater, WA 98501 Tel: (360) 902-8700	Household's and HFC's improper and illegal lending practices.
Weaver, Ken		Household's and HFC's improper and illegal lending practices.
Willa, Joan (J.T.)		Household's and HFC's improper and illegal lending practices.
Williams, Bobby	141 Tara Gail Lane Winston Salem, NC 27127 Tel: (336) 775-4355	Household's improper and illegal lending practices; Household's collection practices; Household's arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Williams, Shantel	1605 Weber Ave #3 Chesapeake, VA 23325 Tel: (757) 313-6889	Household's improper and illegal lending practices; Household's collection practices; Household's

Name	Address/Phone No.	Subjects
		arbitrary reaging policies and practices and Household's policies relating to the restructuring of delinquent loans.
Wilmer, Walter, Jr.	8503 Dorian Lane Clinton, MD 20735 Tel: (301) 856-5794	Household's and HFC's improper and illegal lending practices.
Winkler, Jason		Household's and HFC's improper and illegal lending practices.
Wright, Renee	8102 Trolley Square Xing Atlanta, GA 30306 Tel: (404) 873-6783	Household's and HFC's business, finances, operations; Household's improper and illegal lending practices; Household's training relating to its improper and illegal lending practices.
Xu, Sophie	1104 S. Forums Court, Apt. #1C Wheeling, IL 60090 Tel: (847) 353-8456	Household's and HFC's business, finances and operations; defendants' improper accounting relating to Household's business; Household's improper and illegal lending practices; Household's collection practices; Household's improper reaging practices and policies and policies relating to the restructuring of delinquent loans.
Young, William	3020 Summer House Dr. Valrico, FL 33594 Tel: (813) 657-4330	Household's and HFC's improper and illegal lending practices.
Zannetti, Jennifer	Office of the Attorney General of the State of Washington Consumer Protection Division P.O. Box 40100 1125 Washington Street, SE Olympia, WA 98504-0100 Tel: (360) 753-6200	Household's and HFC's improper and illegal lending practices.

Additionally, plaintiffs believe that there are Regional Sales Managers (RSM), District Sales Managers (DSM), Branch Sales Managers (BSM), Senior Account Executives, Account Executives (AE), Sales Assistants, as well as trainers, collections people, underwriters, and other individuals within the Household organization whose identities are not known to plaintiffs at this time, who are likely to have discoverable information relating to one or more of the subjects outlined in the Complaint. At this time, plaintiffs' investigation is continuing and plaintiffs will supplement the information contained in the Amended Initial Disclosures as additional information becomes available to plaintiffs.

III. COPY OR DESCRIPTION BY CATEGORY OF DOCUMENTS AND TANGIBLE THINGS RELEVANT TO FACTS ALLEGED IN THE PLEADINGS UNDER FED. R. CIV. P. 26(a)(1)(B)

Pursuant to Fed. R. Civ. P. 26(a)(1)(B), plaintiffs respond as follows: Plaintiffs represent that they have the following types of documents in their possession, custody, and/or control that may support their claims:

1. Documents regarding plaintiffs' transactions in Household securities during the Class Period (October 23, 1997 through October 11, 2002);
2. Publicly available documents concerning Household provided by certain state attorney's general to plaintiffs; and
3. Documents regarding Household obtained from public sources.

Plaintiffs will make available to defendants' counsel those non-privileged, relevant documents that are in their possession, custody or control, and that tend to support plaintiffs' positions in this case. Discovery is likely to reveal additional categories of documents responsive to this subsection. As such, plaintiffs reserve the right to further supplement this portion of the disclosures.

IV. COMPUTATION OF DAMAGES UNDER FED. R. CIV. P. 26(a)(1)(C)

Pursuant to Fed. R. Civ. P. 26(a)(1)(C), plaintiffs respond as follows:

A. **Compensatory Damages:** Plaintiffs have not yet determined the full amount of compensatory damages sustained by the proposed class as a result of defendants' conduct and may not be able to do so until after their expert reports are completed.

B. **Plaintiffs' Attorneys' Fees and Costs Incurred in Pursuing this Action:** These fees and costs are being incurred on an ongoing basis, and plaintiffs are presently unable to state the amount of this claim.

C. **Pre-Judgment and Post-Judgment Interests at the Highest Lawful Rate:** Plaintiffs are unable to calculate the amount of pre-judgment and post-judgment interest, as pre-judgment interest is accruing on an ongoing basis, and post-judgment interest will not begin to accrue until after a judgment is obtained.

D. **Other Damages:** Plaintiffs reserve the right to seek other damages in this action.

V. ANY INSURANCE AGREEMENT WHICH MAY BE LIABLE TO SATISFY ALL OR PART OF A JUDGMENT UNDER FED. R. CIV. P. 26(a)(1)(D)

Pursuant to Fed. R. Civ. P. 26(a)(1)(D), plaintiffs respond that the information sought by this portion of the Rule is inapplicable to plaintiffs.

CERTIFICATION

Pursuant to Fed. R. Civ. P. 26(g), I certify that, to the best of my knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, the disclosure is complete and correct as of the time it is made.

DATED: August 20, 2004

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Attorneys for Plaintiff

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DECLARATION OF SERVICE BY 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 interest in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on August 20, 2004, declarant served the **PLAINTIFFS' AMENDED INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)** by depositing a true copy thereof in a United States mailbox at San Francisco, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of August, 2004, at San Francisco, California.



MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 8/19/2004 (02-0377)

Page 1 of 2

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HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 8/19/2004 (02-0377)

Page 2 of 2

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Exhibit 3

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, ON
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiffs,

- *against* -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

Lead Case No. 02-C-5893
(Consolidated)

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**HOUSEHOLD DEFENDANTS' FIFTH SET OF INTERROGATORIES TO LEAD
PLAINTIFFS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Local Rule 33.1, and the Definitions and Instructions set forth below, Defendants Household International, Inc. and Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (collectively "Defendants" or "Household"), by their undersigned attorneys, hereby request that Lead Plaintiffs answer the following interrogatories separately and fully in writing under oath:

INTERROGATORIES

44. Identify the person, document or other source which is the basis of any quoted material contained in the Complaint.

45. Identify each federal and/or state law that Plaintiffs contend Defendants violated, with reference to particular provisions and the Household product, practice or policy that allegedly violated the law and the basis for that contention.

46. Identify any person not affiliated with Household believed by Plaintiffs to have knowledge of any alleged “predatory lending practices.”

47. Identify the document referenced by counsel for Plaintiffs, Patrick Coughlin and Azra Mehdi, in the settlement conference before Judge Guzman on August 22, 2005 as a document that shows the participation or approval of senior Household management in any allegedly illegal practices.

48. Identify all facts and documents that Plaintiffs contend show the participation or approval of senior Household management in any allegedly illegal practices.

49. Identify all facts and documents that support your contention that “the Vision system was designed to automatically ‘reage’ delinquent accounts if it received even a partial payment without any evidence that the delinquency was cured. . . . The Defendants relied on the Vision system to track the success of Household’s fraudulent scheme.” (AC at ¶¶112-113).

50. Identify all facts and documents that Plaintiffs contend establish that Mr. Aldinger acted with scienter as to the any fraud alleged in the Complaint

51. Identify all facts and documents that Plaintiffs contend establish that Mr. Gilmer acted with scienter as to any fraud alleged in the Complaint.

52. Identify all facts and documents that Plaintiffs contend establish that Mr. Schoenholz acted with scienter as to any fraud alleged in the Complaint.

53. Identify all facts and documents that Plaintiffs contend establish that Mr. Vozar acted with scienter as to any fraud alleged in the Complaint.

54. What do Plaintiffs contend constitutes an “improper” reaging or restructuring of a delinquent account as alleged and set forth in Part VI.B of the Complaint. (AC ¶¶ 50, 107-133)?

55. Identify all facts and documents that provide the basis for any contention that Household's loss reserves were inadequate.

56. Identify the percentage and/or number of Household's loans which included prepayment penalties which Plaintiffs contend "were not disclosed or which were actively concealed, or whose existence or imposition was misrepresented in some fashion, as well as prepayment penalties that were in violation of state or federal law" (Plaintiffs' Response to Defendants' Supplemental Interrogatories at 18)?

57. Identify all facts and documents that provide the basis for distinguishing between any Household loans which included alleged prepayment penalties "that were not disclosed or which were actively concealed, or whose existence or imposition was misrepresented in some fashion, as well as prepayment penalties that were in violation of state or federal law" (Plaintiffs' Response to Defendants' Supplemental Interrogatories at 18) and loans which included prepayment penalties which do not meet that criteria.

58. If Plaintiffs contend that Household International, Inc.'s non-bank finance company subsidiary, Household Finance Corp., was obliged to follow FFIEC guidelines pertaining to reaging and charge-off of loans, identify all facts and documents that support this contention.

59. Identify all facts and documents that Plaintiffs contend establish that the alleged fraud arising from "Illegal Predatory Lending Practices" as set forth in Part VI.A of the Complaint (AC ¶¶ 50-106) was material to Household's business.

60. Identify all facts and documents that Plaintiffs contend establish that the alleged fraud arising from "Improperly 'Reaging' or 'Restructuring' Delinquent Accounts," as alleged and set forth in Part VI.B of the Complaint (AC ¶¶ 50, 107-133) was material to Household's business.

61. Identify all facts and documents that Plaintiffs contend establish that the alleged fraud arising from “Improper Accounting of Costs Associated With Various Credit Card Co-Branding, Affinity and Marketing Agreements” as alleged and set forth in Part VI.C of the Complaint (AC ¶¶ 50, 134-155) was material to Household’s business.

62. Identify all subscribers of the “Portfolio Monitoring Program” as that term is used on www.lerachlaw.com, as of October, 2002, including, if any, the Lead Plaintiffs in this case.

DEFINITIONS AND INSTRUCTIONS

1. The term “Complaint” or “AC” means the [Corrected] Amended Consolidated Class Action Complaint filed in this action.

2. The term “Plaintiffs” means the Plaintiffs in this consolidated class action.

3. The term “Plaintiffs’ Response to Defendants’ Supplemental Interrogatories” means Lead Plaintiffs’ Amended Responses and Objections to Household Defendants’ [Sixth] Set of Interrogatories to Lead Plaintiffs, served on Defendants on December 14, 2006 by counsel for Plaintiffs.

4. The term “FFIEC” means Federal Financial Institutions Examination Council.

5. When used with reference to a person, the term “identify” means: (i) complete name and any nickname; (ii) current or last known employment (employer, title or job function, employment address); (iii) current or last known business telephone number; (iv) last known home address; and (v) name, address and telephone number of said person’s counsel, if any, in connection with this lawsuit.

6. When used with reference to a document, the term “identify” shall require a response that includes the: (i) date; (ii) author(s); (iii) addressees and recipients; (iv) number of

pages; and (v) such additional description sufficient to permit its location and production pursuant to a Rule 34 demand for the production of documents. If the document identified has been produced in this action, then a response shall include the bates number of the document.

7. The requirements of Rule 33 of the Federal Rules of Civil Procedure and Local Rule 33.1 are incorporated herein by reference.

8. If any of the interrogatories cannot be answered in full, answer to the extent possible, specifying the reasons for Plaintiffs' inability to answer the remainder and stating whatever information, knowledge or belief Plaintiffs do have concerning the unanswered portion.

9. If any information is withheld on grounds of privilege or work product immunity, (i) identify the information with sufficient particularity to allow the matter to be brought before the court; (ii) state in writing the nature of the privilege claimed, and the legal and factual basis for the claim of the privilege or work product immunity.

10. Any objection to these interrogatories shall state with specificity all grounds therefore. All objections not made shall be deemed waived.

11. Pursuant to Rule 26 of the Federal Rules of Civil Procedure, these interrogatories shall be deemed continuing and shall require further and supplemental answers should Plaintiffs obtain information with respect to the subject matter of any of these interrogatories making their responses, objections, or production in response thereto incomplete, inaccurate or in any way misleading.

Dated: New York, New York
December 22, 2006

CAHILL GORDON & REINDEL LLP



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*Attorneys for Defendants Household International,
Inc., Household Finance Corporation, William F.
Aldinger, David A. Schoenholz, Gary Gilmer and
J.A. Vozar*

Exhibit 4

**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.)	
_____)	

**LEAD PLAINTIFFS' RESPONSES AND OBJECTIONS TO HOUSEHOLD
DEFENDANTS' EIGHTH SET OF INTERROGATORIES TO
LEAD PLAINTIFFS**

standards. Moreover, defendants have persistently maintained that this is not a consumer fraud action, both in filings made to the Court as well as in representations made by defense counsel in Court. Accordingly, Lead Plaintiffs fail to understand how this information relating to defendants' violations is designed to either clarify issues in the case or narrow the scope of the dispute. Further, Lead Plaintiffs incorporate by reference their responses to all prior interrogatories served by defendants in this litigation.

INTERROGATORY NO. 259 [46]:

Identify any person not affiliated with Household believed by Plaintiffs to have knowledge of any alleged "predatory lending practices."

RESPONSE TO INTERROGATORY NO. 259 [46]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs object to this interrogatory because it is vague and ambiguous with respect to the terms "any person not affiliated with Household," "any," and "predatory lending practices." This interrogatory is completely unintelligible and makes no sense. The term "any person not affiliated with Household" conceivably encompasses many different segments of individuals and entities. Further, in conjunction with the use of the term "any," defendants interrogatory could apply to every financial institution that lends money to borrowers. Further, since defendants have refused to provide a definition for these terms, Lead Plaintiffs response to this interrogatory is based upon their understanding of the terms as outlined in their Supplemental Responses and Objections to Household's Fourth Set of Interrogatories, Interrogatory No. 19 [9]. Lead Plaintiffs also object on the grounds that this interrogatory fails to identify a time period for which a response is sought. Lead Plaintiffs further object on the grounds that this interrogatory is overly broad, unduly burdensome, harassing and obviously designed simply to waste the Class' time and resources.

Additionally, Lead Plaintiffs object to this interrogatory on the grounds that it cannot be fully answered until discovery has been substantially completed. Although fact-discovery cut-off is

scheduled for January 31, 2007, defendants are still producing responsive documents notwithstanding their improper and evasive certification that their document production is complete. Defendants have also failed to log documents on privilege logs despite improperly withholding and/or redacting responsive documents in violation of Fed. R. Civ. P. 26. Further, defendants have objected to producing documents and/or deposition testimony from a number of witnesses that defendants have identified as having knowledge of facts relevant to this litigation. In addition, the Individual Defendants have refused to respond to the discovery propounded on them by the Class, directing the Class instead to wait until after their depositions to obtain information relevant to this litigation from the Individual Defendants. Three of the Individual Defendants have yet to be deposed. Lead Plaintiffs will provide responses based upon such facts as are currently known to them. Lead Plaintiffs reserve the right, as necessary and appropriate, to supplement, amend, modify or revise their response to this interrogatory consistent with their obligations under Fed. R. Civ. P. 26(e).

Notwithstanding the foregoing General and Specific Objections and without waiving them, Lead Plaintiffs further respond to this interrogatory as follows:

Lead Plaintiffs respond to this interrogatory based upon the interpretation that defendants seek information only related to Household's alleged predatory lending practices, rather than for "any" company. Lead Plaintiffs do not know the identity of "any person not affiliated with Household" that had knowledge of Household's alleged predatory lending practices. Lead Plaintiffs and a predominant portion of the certified Class of investors of Household securities did not have knowledge of the predatory lending practices Household was engaged in during the Class Period. Additionally, when there was leakage of negative information relating to Household's deceptive practices during the Class Period, defendants pro-actively and affirmatively managed public perception by disseminating information denying that the Company was engaged in any such

practices. Further, Lead Plaintiffs incorporate by reference their responses to all prior interrogatories served by defendants in this litigation.

INTERROGATORY NO. 260 [47]:

Identify the document referenced by counsel for Plaintiffs, Patrick Coughlin and Azra Mehdi, in the settlement conference before Judge Guzman on August 22, 2005 as a document that shows the participation or approval of senior Household management in any allegedly illegal practices.

RESPONSE TO INTERROGATORY NO. 260 [47]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs further object on the grounds that this interrogatory violates Federal Rule of Evidence 408 because it demands information discussed in the context of settlement negotiations in this litigation. Moreover, Lead Plaintiffs object to this interrogatory on the grounds that defendants have asked numerous other questions that already cover the information sought by this interrogatory.

INTERROGATORY NOS. 261-262 [48]:

Identify all facts and documents that Plaintiffs contend show the participation or approval of senior Household management in any allegedly illegal practices.

RESPONSE TO INTERROGATORY NOS. 261-262 [48]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs further object to this interrogatory on the grounds that it is compound and constitutes at least two separate interrogatories. Lead Plaintiffs further object to these interrogatories on the grounds that their requirement that Lead Plaintiffs identify "all" facts and documents is contrary to the Court's November 10, 2005 Order. Lead Plaintiffs further object on the grounds that these interrogatories are overly broad and unduly burdensome. Lead Plaintiffs also object on the grounds that these interrogatories fail to specify a time period for which a response is sought. Lead Plaintiffs also object to these interrogatories as vague and ambiguous and fail to define the term "illegal practices."

INTERROGATORY NO. 284 [62]:

Identify all subscribers of the "Portfolio Monitoring Program" as that term is used on www.lerachlaw.com as of October, 2002, including, if any, the Lead Plaintiffs in this case.

RESPONSE TO INTERROGATORY NO. 284 [62]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if set fully forth herein. Lead Plaintiffs further object to this interrogatory because the information sought by this interrogatory is neither relevant to the claims for defenses of any party in this litigation, nor designed to lead to the discovery of admissible evidence. Lead Plaintiffs also object to this interrogatory because it is invasive of the attorney-client relationship and calls for disclosure of information protected by the attorney work product doctrine and/or the attorney-client privilege. This interrogatory is transparently intended to harass and oppress Lead Plaintiffs.

DATED: January 24, 2007

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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 January 24, 2007, declarant served by electronic mail and by U.S. Mail to the parties the: **LEAD PLAINTIFFS' RESPONSES AND OBJECTIONS TO HOUSEHOLD DEFENDANTS' [EIGHTH] SET OF INTERROGATORIES TO LEAD PLAINTIFFS**. The parties' email addresses are as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of January, 2007, at San Francisco, California.



MONTINA O. GAMBOA

Exhibit 5

**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.)	
_____)	

**LEAD PLAINTIFFS' FIFTH SUPPLEMENTAL AMENDED RESPONSES AND
OBJECTIONS TO HOUSEHOLD DEFENDANTS' EIGHTH SET OF
INTERROGATORIES TO LEAD PLAINTIFFS**

misrepresentations; finance charges and “discount points” that bore no relation to interest rates; failure to disclose or inadequate disclosure of loan terms; improper prepayment penalties; improper insurance products; upselling loans carrying exorbitant interest rates. Mr. Devor’s report further discusses, *inter alia*, Household’s restatement of earnings as filed on August 27, 2002 and related GAAP violations in connection with its GM Partnership Agreement; AFL-CIO/UP Partnership Agreements; and Kessler Partnership Agreement.

INTERROGATORY NO. 266 [46]:

Identify any person not affiliated with Household believed by Plaintiffs to have knowledge of any alleged “predatory lending practices.”

RESPONSE TO INTERROGATORY NO. 266 [46]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs also object to this interrogatory because it suffers from the same infirmities plaguing all of defendants’ interrogatories thus far – it is incomprehensible, unintelligible, vague and ambiguous as drafted. Defendants have demonstrated a complete inability to ask a direct question to which a response can be provided. Lead Plaintiffs object to this interrogatory because it fails to state with particularity the information defendants seek. Lead Plaintiffs object to this interrogatory because it is vague and ambiguous with respect to the terms “any person not affiliated with Household” and “any alleged predatory lending practices.” The terms “any person not affiliated with Household” conceivably encompasses many different segments of individuals and entities. Further, in conjunction with the use of the terms “any alleged predatory lending practices” defendants interrogatory could apply to every financial institution that lends money to borrowers, without any limitation to Household. Further, since defendants have refused to provide a definition for these terms, Lead Plaintiffs response to this interrogatory is based upon their understanding of the terms as outlined in their Amended Supplemental Responses and Objections to Household’s Fourth Set of Interrogatories, Interrogatory No. 34 [9]. Lead Plaintiffs also object on the grounds

that this interrogatory fails to identify a time period for which a response is sought. Lead Plaintiffs further object on the grounds that this interrogatory is overly broad, unduly burdensome, harassing and obviously designed simply to waste the Class' time and resources.

Additionally, Lead Plaintiffs object to this interrogatory on the grounds that it cannot be fully answered until expert discovery has been completed. Although fact-discovery cut-off was scheduled for January 31, 2007, defendants are still producing responsive documents notwithstanding their improper and evasive certification that their document production is complete. Defendants have also failed to log documents on privilege logs despite improperly withholding and/or redacting responsive documents in violation of Fed. R. Civ. P. 26. Further, defendants have objected to producing documents and/or deposition testimony from a number of witnesses that defendants have identified as having knowledge of facts relevant to this litigation. In addition, the Individual Defendants have refused to respond to the discovery propounded on them by the Class. Lead Plaintiffs will provide responses based upon such facts as are currently known to them. Lead Plaintiffs reserve the right, as necessary and appropriate, to supplement, amend, modify or revise their response to this interrogatory consistent with their obligations under Fed. R. Civ. P. 26(e).

Subject to and specifically incorporating the foregoing General and Specific Objections and without waiving them, Lead Plaintiffs further respond to this interrogatory as follows:

Lead Plaintiffs respond to this interrogatory based upon the interpretation that defendants seek information only related to Household's alleged predatory lending practices, rather than the practices of every lending institution under the sun. Lead Plaintiffs do not specifically know the identity of "any person not affiliated with Household" that had knowledge of Household's alleged predatory lending practices. Based upon the discovery thus far, it appears however, that numerous of the state regulatory agencies were aware of some of Household's predatory lending practices and cited the Company for violations of various state statutes at different times during the Class Period.

At times, the Company was cited repeatedly for the same violations, but failed to take any corrective action. Additionally, at various times, it appears that the federal regulatory agencies, including the Office of Thrift Supervision and the Federal Depository Insurance Company were aware of some of Household's predatory lending practices and made factual findings regarding such practices. At different times, it also appears that the Attorneys General of various states became aware of some or all of Household's predatory lending practices. For example, at different times during the Class Period, Household was subpoenaed by state Attorneys General to provide information relating to the Company's lending practices based upon complaints received by the respective agencies by their constituents, including Minnesota, Arizona, California, Washington, Florida, New York, Illinois, and other. Additionally, presumably the customers that Household defrauded, obtained some knowledge of the fact that they had been subjected to deceptive or predatory sales practices at some point after they had signed up for their Household loans.

Lead Plaintiffs and a predominant portion of the certified Class of investors of Household securities did not have knowledge of the predatory lending practices Household was engaged in during the Class Period. Additionally, when there was leakage of negative information relating to Household's deceptive practices during the Class Period, defendants pro-actively and affirmatively managed public perception by disseminating information denying that the Company was engaged in any such practices. Further, Lead Plaintiffs also incorporate by reference their responses to all prior interrogatories served by defendants in this litigation.

In addition to the above, Lead Plaintiffs incorporate by reference and identify the Expert Report of Catherine A. Ghiglieri dated August 15, 2007, her Rebuttal Report dated February 1, 2008, and all documents referenced therein. Lead Plaintiffs further incorporate by reference and identify the Expert Report of Harris L. Devor dated August 15, 2007, and all documents referenced therein.

Ms. Ghiglieri and Mr. Devor have knowledge about, *inter alia*, Household's practices regarding the predatory lending, including customer and regulator criticism of those practices.

INTERROGATORY NO. 267 [47]:

Identify the document referenced by counsel for Plaintiffs, Patrick Coughlin and Azra Mehdi, in the settlement conference before Judge Guzman on August 22, 2005 as a document that shows the participation or approval of senior Household management in any allegedly illegal practices.

RESPONSE TO INTERROGATORY NO. 267 [47]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs further object on the grounds that this interrogatory violates Federal Rule of Evidence 408 because it demands information discussed in the context of settlement negotiations in this litigation. Moreover, Lead Plaintiffs object to this interrogatory on the grounds that defendants have asked numerous other questions that already cover the information sought by this interrogatory that does not violate Fed. R. Evid. 408.

INTERROGATORY NOS. 268-269 [48]:

Identify all facts and documents that Plaintiffs contend show the participation or approval of senior Household management in any allegedly illegal practices.

RESPONSE TO INTERROGATORY NOS. 268-269 [48]:

Lead Plaintiffs hereby incorporate all the General Objections above, as if fully set forth herein. Lead Plaintiffs further object to this interrogatory on the grounds that it is compound and constitutes at least two separate interrogatories. Lead Plaintiffs further object to these interrogatories on the grounds that their requirement that Lead Plaintiffs identify "all" facts and documents is contrary to the Court's November 10, 2005 Order. Lead Plaintiffs further object on the grounds that these interrogatories are overly broad and unduly burdensome. Lead Plaintiffs also object on the grounds that these interrogatories fail to specify a time period for which a response is sought. Lead Plaintiffs also object to these interrogatories as vague and ambiguous in that they fail to define the

protected by the attorney work product doctrine and/or the attorney-client privilege. This interrogatory is transparently intended to harass and oppress Lead Plaintiffs.

DATED: February 1, 2008

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LAW OFFICES OF LAWRENCE G.
SOICHER
LAWRENCE G. SOICHER
110 East 59th Street, 25th Floor
New York, NY 10022
Telephone: 212/883-8000
212/355-6900 (fax)

Attorneys for Plaintiff

T:\CasesSF\Household Intl\RES00048846_Amd 8th Resp_20108.doc

DECLARATION OF SERVICE BY ELECTRONIC MAIL AND 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 February 1, 2008, declarant served by electronic mail and by U.S. to the parties the **LEAD PLAINTIFFS' FIFTH SUPPLEMENTAL AMENDED RESPONSES AND OBJECTIONS TO HOUSEHOLD DEFENDANTS' [EIGHTH] SET OF INTERROGATORIES TO LEAD PLAINTIFFS**. 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
--	--

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 1st day of February, 2008, at San Francisco, California.



MONINA O. GAMBOA

Exhibit 6

**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.)	
_____)	

PLAINTIFFS' WITNESS LIST

Plaintiffs intend to call live the following witnesses:¹

Witness	Address
1. Aldinger, William F.	c/o Eimer Stahl 224 S. Michigan Ave, Suite 1100 Chicago, IL 60604
2. Ancona, Edgar D.	199 North Green Bay Rd. Lake Forest, IL 60045
3. Bernstein, James	5216 Ewing Ave. South #204 Minneapolis, MN 55410
4. *Buwalda, John	c/o Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine Street, 26th Floor San Francisco, CA 94111
5. *Callen, Seth	c/o Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine Street, 26th Floor San Francisco, CA 94111
6. Detelich, Thomas	38W569 Fairway Drive Saint Charles, IL 60175
7. Devor, Harris ²	Shectman, Marks, Devor PC 2000 Market St., Ste. 500 Philadelphia, PA 19103
8. *Dorsey, Chantel	c/o Coughlin Stoia Geller Rudman & Robbins LLP 100 Pine Street, 26th Floor San Francisco, CA 94111

¹ In the event that any of the listed witnesses becomes unavailable, plaintiffs will call the witness via video deposition testimony.

² This witness will be offered as an expert.

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

- | | |
|---------------------------------------|---|
| 9. *Feifer, Robert | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |
| 10. Fischel, Daniel R. ³ | Compass Lexecon
332 S. Michigan Ave.
Chicago, IL 60604 |
| 11. Ghiglieri, Catherine ⁴ | Ghiglieri & Company
2300 Cypress Point West
Austin, TX 78746 |
| 12. Gilmer, Gary D. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 13. *Howrey, Curtis | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |
| 14. *Kuhn, Robert | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |
| 15. *McNeal, Kimberly | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |
| 16. McDonald, Steven | 66 South Wynstone Drive
North Barrington, IL 60010 |
| 17. Mizialko, Clifford | 9 Sandpiper Lane
Hawthorne Woods, IL 60047 |

³ This witness will be offered as an expert.

⁴ This witness will be offered as an expert.

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

- | | |
|--------------------------|---|
| 18. Murphy, Celeste | 856 Oakwood Ave.
Lake Forest, IL 60045 |
| 19. Pantelis, Daniel | 13 Victoria Lane
Lincolnshire, IL 60069 |
| 20. Peters, Richard J. | unknown ⁵ |
| 21. Robin, Kenneth | 950 North Michigan Ave.
Apt. 4703
Chicago, IL 60611 |
| 22. Rodemoyer, Carin | 5700 Crestview Drive
Western Springs, IL 60558 |
| 23. Rybak, Walter | 508 Leonard St.
Park Ridge, IL 60068 |
| 24. Schneider, Thomas | 1605 Buckthorn Dr.
Hoffman Estates, IL 60192 |
| 25. Schoenholz, David A. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 26. Stephens, Brian | 345 Old Sutton Rd.
Barrington, IL 60010 |
| 27. *Timmons, John | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |
| 28. *Valverde, Jessie | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |

⁵ Plaintiffs believe that Richard Peters was a resident of Illinois at the time of his deposition and continues to reside in the state.

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

29. Vozar, Joseph A. c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604
30. *Wieck, Maria c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

Plaintiffs intend to call live the following witnesses only if defendants object to admission of documents on plaintiffs' exhibit list that were produced from the witness' files used during their depositions or that were authored or received by the witness:

- | Witness | Address |
|------------------------------|--|
| 1. Anderson, Dan | 383 Country Oak Ln.
Inverness, IL 60060 |
| 2. Connaughton, James | 1600 Meadow Lane
#107
Bannockburn, IL 60015 |
| 3. Cunningham, Curt | 1100 Hillcrest Avenue
Fox River Grove, IL 60021 |
| 4. Curtin, Kathleen Kelly A. | 122 W. 3rd Street
Hinsdale, IL 60521 |
| 5. Hicks, Stephen | 1228 Gregory Ave.
Wilmette, IL 60091 |
| 6. Nelson, Kay | 1581 West Adamy Court
Addison, IL 60101 |
| 7. Sesterhenn, Peter Alan | 1220 Canterbury Circle
Libertyville, IL 60048 |
| 8. Sodeika, Lisa | 15 Pentwater Drive
South Barrington, IL 60010 |

9. Stroom, Craig A. 334 Fairview Ave.
Deerfield, IL 60015

Plaintiffs intend to call the following witnesses via video deposition testimony:⁶

- | Witness | Address |
|--------------------------------|--|
| 1. Allcock, Robin | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 2. Cross, Charles ⁷ | c/o Gordon Thomas Honeywell
Malanca Peterson & Daheim LLP
Wells Fargo Plaza
1201 Pacific Avenue, Suite 2100
Tacoma, WA 98402 |
| 3. Ekholdt, Per | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 4. Flint, Douglas | 8 Canada Square
London, E14 |
| 5. Friedrich, Douglas | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 6. Hayden-Hakes, Megan E. | 1759 N. Underwood Ave.
Wauwatosa, WI 53213 |
| 7. Hennigan, Ned M. | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 8. Hueman, Dennis | 1806 Avenida Salvador
San Clemente, CA 92672 |
| 9. Kauffman, James | 1069 Bald Eagle Dr.
Marco Island, FL 34145 |

⁶ In the event that any of the listed witnesses becomes available, plaintiffs will call the witness live.

⁷ This witness will be offered as an expert.

10. Keller, Jonathan M. 40 Portland Rd
Summit, NJ 07901
11. Levy, Louis c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
12. Little, David 11506 Hammock Oaks Ct.
Lithia, FL 33547
13. Long, William 90 S. Seventh St.
4200 Wells Fargo Senter
Minneapolis, MN 55402
14. Makowski, Paul 3302 Leamington Lane
Charlotte, NC 28226
15. Markell, Helen E. 876 Canyon View Drive
Laguna Beach, CA 92651
16. May, Todd 90 S. Seventh St.
4200 Wells Fargo Senter
Minneapolis, MN 55402
17. O'Han, Robert c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
18. Posner, Kenneth c/o Allen & Overy LLP
1221 Avenue of the Americas
New York, NY 10020
19. Pruzan, Jonathan c/o Allen & Overy LLP
1221 Avenue of the Americas
New York, NY 10020
20. Sprude, Margaret 26132 Legends Ct.
Salinas, CA 93908
21. Titus, Timothy 1 Eagle Drive
Ringoos, NJ 08551
22. Walker, Kenneth 1224 Gatesville Rd.
Amhurst, VA 24521
23. Walter, Lewellyn 1199 N. Terry St.
Eugene, OR 97402

Exhibit 7

**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.)	
_____)	

PLAINTIFFS' REVISED WITNESS LIST

Plaintiffs intend to call live the following witnesses:¹

Witness	Address
1. Aldinger, William F.	c/o Eimer Stahl 224 S. Michigan Ave, Suite 1100 Chicago, IL 60604
2. Ancona, Edgar D.	199 North Green Bay Rd. Lake Forest, IL 60045
3. Bernstein, James	5216 Ewing Ave. South #204 Minneapolis, MN 55410
4. Buwalda, John	320 York Ave. Oceano, CA 93445
5. Callen, Seth	613 NW Dearborn Ave. Lawton, OK 73507
6. Detelich, Thomas	38W569 Fairway Drive Saint Charles, IL 60175
7. Devor, Harris ²	Shectman, Marks, Devor PC 2000 Market St., Ste. 500 Philadelphia, PA 19103
8. Dorsey, Chantel	3651 Bill of Rights Sq. Columbus, OH 43207
9. Feifer, Robert	5443 New Dawn Cr. Riverton, Utah 84096
10. Fischel, Daniel R. ³	Compass Lexecon 332 S. Michigan Ave. Chicago, IL 60604
11. Ghiglieri, Catherine ⁴	Ghiglieri & Company

¹ In the event that any of the listed witnesses becomes unavailable, plaintiffs will call the witness via video deposition testimony.

² This witness will be offered as an expert.

³ This witness will be offered as an expert.

- | | |
|------------------------|---|
| | 2300 Cypress Point West
Austin, TX 78746 |
| 12. Gilmer, Gary D. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 13. Howrey, Curtis | 40 Las Flores Dr.
Chula Vista, CA 91910 |
| 14. Kuhn, Robert | 11 Birch Circle, Unit #1
Colchester, CT 06415 |
| 15. McNeal, Kimberly | 2942 W. 60th Drive
Merrillville, IN 46410 |
| 16. McDonald, Steven | 66 South Wynstone Drive
North Barrington, IL 60010 |
| 17. Mizialko, Clifford | 9 Sandpiper Lane
Hawthorne Woods, IL 60047 |
| 18. Murphy, Celeste | 856 Oakwood Ave.
Lake Forest, IL 60045 |
| 19. Pantelis, Daniel | 13 Victoria Lane
Lincolnshire, IL 60069 |
| 20. Peters, Richard J. | unknown ⁵ |
| 21. Robin, Kenneth | 950 North Michigan Ave.
Apt. 4703
Chicago, IL 60611 |
| 22. Rodemoyer, Carin | 5700 Crestview Drive
Western Springs, IL 60558 |
| 23. Rybak, Walter | 508 Leonard St.
Park Ridge, IL 60068 |

⁴ This witness will be offered as an expert.

⁵ Plaintiffs believe that Richard Peters was a resident of Illinois at the time of his deposition and continues to reside in the state.

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

- | | |
|--------------------------|---|
| 24. Schneider, Thomas | 1605 Buckthorn Dr.
Hoffman Estates, IL 60192 |
| 25. Schoenholz, David A. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 26. Stephens, Brian | 345 Old Sutton Rd.
Barrington, IL 60010 |
| 27. Timmons, John | c/o Mountain West Mortgage
3700 S. Russell, Suite 114
Missoula, MT 59801 |
| 28. Valverde, Jessie | 548 Curlew Road
Livermore, CA 94551 |
| 29. Vozar, Joseph A. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 30. *Wieck, Maria | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

Plaintiffs intend to call live the following witnesses only if defendants object to admission of documents on plaintiffs' exhibit list that were produced from the witness' files used during their depositions or that were authored or received by the witness:

- | Witness | Address |
|------------------------------|--|
| 1. Anderson, Dan | 383 Country Oak Ln.
Inverness, IL 60060 |
| 2. Connaughton, James | 1600 Meadow Lane
#107
Bannockburn, IL 60015 |
| 3. Cunningham, Curt | 1100 Hillcrest Avenue
Fox River Grove, IL 60021 |
| 4. Curtin, Kathleen Kelly A. | 122 W. 3rd Street
Hinsdale, IL 60521 |

- | | |
|---------------------------|--|
| 5. Hicks, Stephen | 1228 Gregory Ave.
Wilmette, IL 60091 |
| 6. Nelson, Kay | 1581 West Adamy Court
Addison, IL 60101 |
| 7. Sesterhenn, Peter Alan | 1220 Canterbury Circle
Libertyville, IL 60048 |
| 8. Sodeika, Lisa | 15 Pentwater Drive
South Barrington, IL 60010 |
| 9. Stroom, Craig A. | 334 Fairview Ave.
Deerfield, IL 60015 |

Plaintiffs intend to call the following witnesses via video deposition testimony:⁶

- | Witness | Address |
|--------------------------------|--|
| 1. Allcock, Robin | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 2. Cross, Charles ⁷ | c/o Gordon Thomas Honeywell
Malanca Peterson & Daheim LLP
Wells Fargo Plaza
1201 Pacific Avenue, Suite 2100
Tacoma, WA 98402 |
| 3. Ekholdt, Per | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 4. Flint, Douglas | 8 Canada Square
London, E14 |
| 5. Friedrich, Douglas | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |

⁶ In the event that any of the listed witnesses becomes available, plaintiffs will call the witness live.

⁷ This witness will be offered as an expert.

6. Hayden-Hakes, Megan E. 1759 N. Underwood Ave.
Wauwatosa, WI 53213
7. Hennigan, Ned M. c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
8. Hueman, Dennis 1806 Avenida Salvador
San Clemente, CA 92672
9. Kauffman, James 1069 Bald Eagle Dr.
Marco Island, FL 34145
10. Keller, Jonathan M. 40 Portland Rd
Summit, NJ 07901
11. Levy, Louis c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
12. Little, David 11506 Hammock Oaks Ct.
Lithia, FL 33547
13. Long, William 90 S. Seventh St.
4200 Wells Fargo Senter
Minneapolis, MN 55402
14. Makowski, Paul 3302 Leamington Lane
Charlotte, NC 28226
15. Markell, Helen E. 876 Canyon View Drive
Laguna Beach, CA 92651
16. May, Todd 90 S. Seventh St.
4200 Wells Fargo Senter
Minneapolis, MN 55402
17. O'Han, Robert c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
18. Posner, Kenneth c/o Allen & Overy LLP
1221 Avenue of the Americas
New York, NY 10020
19. Pruzan, Jonathan c/o Allen & Overy LLP
1221 Avenue of the Americas
New York, NY 10020

- | | |
|----------------------|--|
| 20. Sprude, Margaret | 26132 Legends Ct.
Salinas, CA 93908 |
| 21. Titus, Timothy | 1 Eagle Drive
Ringoos, NJ 08551 |
| 22. Walker, Kenneth | 1224 Gatesville Rd.
Amhurst, VA 24521 |
| 23. Walter, Lewellyn | 1199 N. Terry St.
Eugene, OR 97402 |

Exhibit 8

CAHILL GORDON & REINDEL LLP
EIGHTY PINE STREET
NEW YORK, NY 10005-1702

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KEVIN J. BURKE
JAMES J. CLARK
BENJAMIN J. COHEN
CHRISTOPHER T. COX
W. LESLIE DUFFY
ADAM M. DWORKIN
RICHARD E. FARLEY
PATRICIA FARREN
JOAN MURTAGH FRANKEL
JONATHAN J. FRANKEL
BART FRIEDMAN
CIRO A. GAMBONI
WILLIAM B. GANNETT
CHARLES A. GILMAN
STEPHEN A. GREENE

ROBERT M. HALLMAN
WILLIAM M. HARTNETT
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
DAVID G. JANUSZEWSKI
ELAI KATZ
THOMAS J. KAVALER
DAVID N. KELLEY
CHÉRIE R. KISER*
EDWARD P. KRUGMAN
JOEL KURTZBERG
ALIZA R. LEVINE
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MICHAEL MACRIS
ANN S. MAKICH
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GERARD M. MEISTRELL
MICHAEL E. MICHETTI
WILLIAM J. MILLER
ATHY A. MOBILIA
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TELEPHONE: (212) 701-3000
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6A AUSTIN FRIARS
LONDON, ENGLAND EC2N 2HA
(011) 44.20.7920.9800
FAX: (011) 44.20.7920.9825

WRITER'S DIRECT NUMBER

(212) 701-3648

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JAMES ROBINSON
THORN ROSENTHAL
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HOWARD G. SLOANE
LAURENCE T. SORKIN
SUSANNA M. SUH
GERALD S. TANENBAUM
JONATHAN D. THIER
JOHN A. TRIFOODORO
ROBERT USADI
GEORGE WAILAND
GLENN J. WALDRIP, JR.

MICHAEL B. WEISS
S. PENNY WINDLE
COREY WRIGHT
DANIEL J. ZUBKOFF
ADAM ZUROFSKY

SENIOR COUNSEL
LAWRENCE A. KOBRIN
IMMANUEL KOHN

COUNSEL
ANASTASIA EFIMOVA
JAY GEIGER
SAMUEL LICHTMAN
RAND McQUINN**

*ADMITTED IN
DC ONLY

**ADMITTED IN
DC, TX, VA ONLY

November 7, 2008

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.
Case No. 02-CV-5893 (N.D. Ill.)

Dear Luke:

I write with respect to Plaintiffs' Witness List that was provided on October 31. It is not in good faith compliance with the Court's Standing Order Establishing Pretrial Procedure because it fails to identify the trial witnesses Plaintiffs realistically expect to call in the time allotted to them for trial. Hiding the names of actual intended witnesses in a list of dozens of other individuals is facially unreasonable game-playing.

Not counting nine witnesses whom Plaintiffs say they would call only if Defendants objected to the introduction of certain documents, you have listed 30 witnesses whom you supposedly "intend to call live," and 23 witnesses whom you say you "intend to call . . . via video deposition testimony," for a total of 53 witnesses. This excess is compounded by Plaintiffs' indiscriminate designation of portions of depositions they supposedly intend to introduce. Even if the live witnesses were all speed-talkers, and you played all 50 hours of designated video testimony in fast forward mode, and dispensed with your opening, closing and cross examination of defense witnesses, your representation that you intend to introduce all of these witnesses during Plaintiffs' (presumably one-half) share of the four week trial is simply not credible. This is a further reflection that Plaintiffs did not approach the pretrial order process in a good-faith effort to narrow the issues and specify the actual scope of the trial as required by the Standing Order and basic tenets of fair play.

In contrast to Plaintiffs' approach, you will see on December 8 that, even though Plaintiffs' statement of contested issues is too broad and vague to provide much guidance, Defendants have made a good faith effort to restrict our witnesses to persons whom we realistically expect to call at trial, without deceptive padding. We have taken great pains to carefully tailor the testimony of each of our proposed witnesses, making difficult choices to make sure that it can all fit within the Court-ordered schedule. In keeping with Plaintiffs' obligation "to fulfill the substance and spirit" of

CAHILL GORDON & REINDEL LLP

-2-

the Standing Order, we urge you to tell us without further delay which of the 53 named witnesses Plaintiffs will actually call or may call, either live or through deposition testimony, during what we assume will be their two-week window at trial.

With respect to the nine witnesses that Plaintiffs intend to “call only if defendants object to admission of documents on Plaintiffs’ exhibit list that were produced from the witness’ files used during their deposition or that were authored or received by the witness,” it would move matters forward if you would identify the documents pertaining to each of the nine witnesses that you plan to introduce. That way we will be able to specifically focus on these documents and perhaps obviate the need for some or all of this group of witnesses.

We also note that the list of witnesses you “intend to call live” includes nine people who, to our knowledge, Plaintiffs have never disclosed pursuant to Rule 26(a)(1)’s initial disclosure requirement, Defendants’ Interrogatory No. 46 requesting identification of all persons who are “not affiliated with Household believed by Plaintiffs to have knowledge of any alleged predatory lending practices,” served on January 24, 2007, and Plaintiffs’ duty to supplement their discovery obligations.

These nine individuals are:

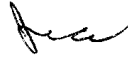
- John Buwalda
- Seth Callen
- Chante Dorsey
- Robert Feifer
- Curtis Howrey
- Robert Kuhn
- Kimberly McNeal
- John Timmons
- Jessie Valverde

If we are mistaken and in fact these witnesses were previously disclosed, please let us know. If Plaintiffs should retain any of these nine individuals in the requested list of Plaintiffs’ actual witnesses, Defendants reserve their right to take appropriate action. In the meantime, please tell us the basis for the statement in your Witness List that these nine individuals “should be contacted only through Coughlin Stoia Geller Rudman & Robbins LLP,” and the statement in your October 31 cover letter that live witnesses listed with your firm’s address (including the nine individuals listed above) may not be directly contacted by us.

CAHILL GORDON & REINDEL LLP

-3-

Sincerely,



Ira J. Dembrow

Luke O. Brooks, Esq.
Coughlin Stoia Geller
Rudman & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111

VIA ELECTRONIC MAIL

cc: Lori Fanning, Esq.
Adam Deutsch, Esq.
Landis C. Best, Esq.

Exhibit 9

Nov-10-08 01:02pm From-

T-938 P.02/08 F-171



SAN DIEGO • SAN FRANCISCO
NEW YORK • BOCA RATON
WASHINGTON, DC • HOUSTON
LOS ANGELES • PHILADELPHIA

Luke O. Brooks
lukeb@csgr.com

November 10, 2008

VIA FACSIMILE

Ira J. Dembrow
CAHILL GORDON & REINDEL LLP
Eighty Pine Street
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*
Case No. 02-CIV-5893 (N.D. Ill)

Dear Ira:

I write in response your three letters sent Friday afternoon. Your accusations of bad faith are, as usual, unfounded and overblown. Plaintiffs have taken great care in selecting their witnesses and testimony. The fact is, the number of diverse issues in the case, the division of Household (a 33,000 employee company) into six segments and the length of the Class Period require this number of witnesses. Preparing the PTO is an iterative process, and defendants have not yet disclosed any information regarding their proposed witnesses or deposition designations. Nor have defendants produced their objections to plaintiffs' witnesses, deposition designations or trial exhibits. Naturally, as this information is provided, plaintiffs will continue to work to refine their witness list and deposition designations. That said, if you really need more than five weeks for your counter-designations, we are available to meet and confer.

With respect to the nine individuals identified in your first letter, these witnesses have expressed their preference that contact and scheduling related to this case go through us. As I am sure you are aware, these witnesses were formerly sales branch employees at Household during the Class Period. Plaintiffs appropriately notified defendants in 2004 of plaintiffs' belief that such employees were likely to have relevant information in plaintiffs' amended initial disclosures, served on August 20, 2004. These explicitly state:

Plaintiffs believe that there are Regional Sales Managers (RSM), District Sales Managers (DSM), Branch Sales Managers (BSM), Senior Account Executives, Account Executives, Sales Assistants, as well as trainers, collections people, underwriters and other individuals within the Household organization whose identities are not known to plaintiffs at this time, who are likely to have discoverable information relating to one or more of the subjects outlined in the Complaint. (See p.67)

Nov-10-08 01:02pm From-

T-838 P.03/09 F-171



Ira J. Dembrow
November 10, 2008
Page 2

Your letter implies that plaintiffs should have previously amended their initial disclosures or interrogatory responses to specifically identify these individuals. However, plaintiffs did not discover that these witnesses had knowledge of defendants' predatory lending practices until after fact discovery closed. Even setting that fact aside, the implication that plaintiffs should have amended their initial disclosures is especially disingenuous given your own stance on amending defendants' initial disclosures. See May 31, 2006 and June 8, 2006 correspondence between Luke Brooks and Ira Dembrow. These individuals are former employees known to the defendants and were identified during the discovery process, specifically "in documents produced in response to Plaintiffs' . . . document requests." See June 8, 2006 Dembrow letter. Thus, by your own standard, even if plaintiffs had discovered these witnesses during the Class Period, amendment would not have been required. As former employees, moreover, they do not fall under the auspices of defendants' interrogatory seeking the identification of "witnesses not **affiliated with Household** believed by Plaintiffs to have knowledge of any alleged predatory lending practices."

Your letter includes a vague reference to taking "appropriate action" if these former Household employees remain on plaintiffs' witness list. Although plaintiffs do not believe any additional action is warranted, we are available this week to discuss the "appropriate action" defendants have in mind.

Your third letter sent Friday complains that plaintiffs have not identified false and misleading statements in their proposed jury instructions and/or verdict form. As you can surmise from their absence, plaintiffs do not believe that in this case it is necessary or appropriate to include each false statement or omission in the jury instructions or verdict form. We would prefer to discuss the jury instructions and verdict form after we receive your edits to our proposals, and not in the piece-meal fashion suggested by your letter. If you would like to begin the discussions early, we welcome your edits to our proposals in advance of December 8. As to your demand that we amend by tomorrow our proposed statement of contested facts and law to include each false statement and the reasons why they are false, we do not understand the statement of contested facts and law to require this level of detail, which is more appropriate for plaintiffs' trial brief, due January 30, 2009. If you are aware of authority to the contrary we will of course consider it.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. Brooks", written over the typed name "Luke O. Brooks".

Luke O. Brooks

LOB:cs

S:\Case5\Household Int\CorrectDembrow_11-10-08 LOB.doc

Exhibit 10

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NEW YORK, NY 10005-1702

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L. HOWARD ADAMS
ROBERT A. ALESSI
HELENE R. BANKS
LANDIS C. BEST
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SUSAN BUCKLEY
KEVIN J. BURKE
JAMES J. CLARK
BENJAMIN J. COHEN
CHRISTOPHER T. COX
W. LESLIE DUFFY
ADAM M. DWORKIN
RICHARD E. FARLEY
PATRICIA FARREN
JOAN MURTAGH FRANKEL
JONATHAN J. FRANKEL
BART FRIEDMAN
CIRO A. GAMBONI
WILLIAM B. GANNETT
CHARLES A. GILMAN
STEPHEN A. GREENE

ROBERT M. HALLMAN
WILLIAM M. HARTNETT
CRAIG M. HOROWITZ
DOUGLAS S. HOROWITZ
DAVID G. JANUSZEWSKI
ELAI KATZ
THOMAS J. KAVALER
DAVID N. KELLEY
CHÉRIE R. KISER*
EDWARD P. KRUGMAN
JOEL KURTZBERG
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GEOFFREY E. LIEBMAN
MICHAEL MACRIS
ANN S. MAKICH
JONATHAN I. MARK
GERARD M. MEISTRELL
MICHAEL E. MICHETTI
WILLIAM J. MILLER
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WRITER'S DIRECT NUMBER

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SENIOR COUNSEL
LAWRENCE A. KOBRIN
IMMANUEL KOHN

COUNSEL
ANASTASIA EFIMOVA
JAY GEIGER
SAMUEL LICHTMAN
RAND McQUINN**

*ADMITTED IN
DC ONLY

**ADMITTED IN
DC, TX, VA ONLY

November 21, 2008

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.
Case No. 02-CV-5893 (N.D. Ill.)

Dear Luke:

I write in response to your November 10, 2008 letter concerning the nine witnesses, listed in my November 7 letter, whose names Plaintiffs disclosed for the first time in this action on their October 31, 2008 Witness List.

You argue that Defendants should have been aware of the nine individuals at issue because their names appear “in documents produced in response to Plaintiffs’ . . . document requests.” This makes no sense. The fact that the names of the nine individuals appear on a few of the five million pages of documents Defendants produced would not have disclosed to Defendants that Plaintiffs, presumably after speaking to each of the individuals, came to the conclusion that each, in the words of your May 31, 2006 letter, is “likely to have discoverable information that [Plaintiffs] may use to [support] the Class’ claims and/or [rebut Defendants’] defenses.” As soon as Plaintiffs had this information as to each proposed witness, they were required by the Federal Rules to supplement their initial disclosures and/or their response to Defendants’ Interrogatory No. 46 under pain of preclusion. Plaintiffs did neither, but waited to identify the nine individuals at issue until they submitted their October 31, 2008 Witness List. Besides being a classic example of attempted trial by ambush, this violates the applicable Federal Rules and is unduly prejudicial to Defendants.

Your further argument that Interrogatory No. 46 is not applicable is based on a strained, illogical construction of the language of that inquiry. Defendants asked for identification of any individuals “not affiliated” with Household whose testimony Plaintiffs intended to rely upon. All of the nine individuals at issue, whom you say you first contacted “after fact discovery closed,” are former Household employees, *i.e.*, individuals “not affiliated” with Household. Plaintiffs’ defensive effort to re-interpret the language of Interrogatory No. 46 strongly suggests that Plaintiffs had knowledge of but deliberately delayed contacting these individuals until after the close of fact dis-

CAHILL GORDON & REINDEL LLP

-2-

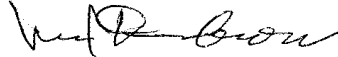
covery, and in any event does not excuse Plaintiffs' failure to update their initial disclosures under Rule 26(e).

As a result of Plaintiffs' failure to properly and timely disclose the names of these nine witnesses, Plaintiffs are precluded from introducing testimony from any of them at trial and their names should therefore be removed from Plaintiffs' Revised Witness List. Please provide us with a further revised Witness List deleting the names of these nine individuals. We also request that you amend your Revised Witness List to delete James Bernstein. You did not timely disclose Mr. Bernstein as someone with "specialized knowledge" pursuant to *Sunstar*. To the contrary, you affirmatively withdrew him from your belated *Sunstar* list and in reliance on that withdrawal Defendants did not take his deposition.

Finally, we have not received any response to date to my request in the same November 7 letter that Plaintiffs identify the documents pertaining to each of nine identified witnesses that Plaintiffs say they intend to call "only if defendants object to admission of documents on Plaintiffs' exhibit list that were produced from the witness' files [of the nine individuals] used during their deposition or that were authored or received by the witness." As I said in my November 7 letter, if Plaintiffs will identify the documents they contemplate using pertaining to the nine witnesses, Defendants "will be able to specifically focus on these documents and perhaps obviate the need for some or all of this group of witnesses." Please let me know when we can expect to receive such identification. If you decline to cooperate, please explain why.

Please let me have your response to these matters as soon as possible.

Sincerely,



Ira J. Dombrow

Luke O. Brooks, Esq.
Coughlin Stoia Geller
Rudman & Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111

VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

cc: D. Cameron Baker, Esq. (via electronic mail)
Azra Z. Mehdi, Esq. (via electronic mail)
Spencer A. Burkholz, Esq. (via electronic mail)
Lori Fanning, Esq. (via electronic mail)
Adam Deutsch, Esq. (via electronic mail)
Landis C. Best, Esq.

Exhibit 11



SAN DIEGO • SAN FRANCISCO
NEW YORK • BOCA RATON
WASHINGTON, DC • HOUSTON
LOS ANGELES • PHILADELPHIA

Luke O. Brooks
LukeB@csgrr.com

November 24, 2008

VIA FACSIMILE

Ira J. Dembrow
CAHILL GORDON & REINDEL LLP
Eighty Pine Street
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*
Case No. 02-CIV-5893 (N.D. Ill)

Dear Ira:

I write in response to your November 21, 2008 letter regarding the nine former Household branch sales employees on plaintiffs' witness list.

Two weeks ago I invited you to meet and confer to discuss defendants' concerns with respect to these witnesses and any "appropriate action" you intend to take. You ignored the offer, waited until Friday and then wrote a factually inaccurate and unproductive letter wherein you assert without basis and contrary to defendants' prior position that plaintiffs failed to comply with their discovery obligations resulting in prejudice to defendants. As I wrote on November 10, plaintiffs' 2004 initial disclosures clearly identified former Household branch sales employees as having knowledge relating to the allegations in plaintiffs' Complaint. We reiterate that plaintiffs did not discover these particular former employees had pertinent knowledge until after the close of fact discovery. Your accusation that plaintiffs deliberately delayed contacting them until after the close of fact discovery is completely without basis. We discovered these witnesses as part of our continuing factual investigation and timely disclosed them on our trial witness list a full five months before the trial is scheduled to begin. Given these facts, your assertions of prejudice and "trial by ambush" are wholly without merit and we decline to remove these witnesses from our trial witness list. That said, we are available to meet and confer Monday and Tuesday of this week to discuss this issue, including how exactly defendants believe they have been prejudiced and whether the parties can agree on any steps to mitigate this perceived prejudice. Please let us know if either of these dates work for defendants.


As to James Bernstein, he will be offered as a percipient witness and not an expert. Accordingly, it is irrelevant whether he appears on Plaintiffs "Sunstar" disclosure and we decline to remove him from our witness list.



Ira J. Dembrow
November 24, 2008
Page 2

As to your last question, plaintiffs identified on their witness list the documents on which we seek agreement – those “that were produced from the witness’ files, used during their depositions or that were authored or received by the witness.” This information is on plaintiffs’ proposed exhibit list, which is fully searchable, has fields containing the author and recipient(s) of each proposed exhibit and identifies the deposition in which each document was used.

Very truly yours,



Luke O. Brooks

LOB:mm

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Exhibit 12

EXHIBIT E-1

**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.)	
)
_____)	

PLAINTIFFS' WITNESS LIST

Plaintiffs intend to call live the following witnesses:¹

	Witness	Address
1.	Aldinger, William F.	c/o Eimer Stahl 224 S. Michigan Ave, Suite 1100 Chicago, IL 60604
2.	Ancona, Edgar D.	199 North Green Bay Rd. Lake Forest, IL 60045
3.	Buwalda, John	320 York Ave. Oceano, CA 93445
4.	Callen, Seth	613 NW Dearborn Ave. Lawton, OK 73507
5.	Detelich, Thomas	38W569 Fairway Drive Saint Charles, IL 60175
6.	Devor, Harris ²	Shectman, Marks, Devor PC 2000 Market St., Ste. 500 Philadelphia, PA 19103
7.	Dorsey, Chantel	3651 Bill of Rights Sq. Columbus, OH 43207
8.	Feifer, Robert	5443 New Dawn Cr. Riverton, Utah 84096
9.	Fischel, Daniel R. ³	Compass Lexecon 332 S. Michigan Ave. Chicago, IL 60604

¹ In the event that any of the listed witnesses becomes unavailable, plaintiffs will call the witness via video deposition testimony.

² This witness will be offered as an expert.

³ This witness will be offered as an expert.

10. Ghiglieri, Catherine⁴ Ghiglieri & Company
2300 Cypress Point West
Austin, TX 78746
11. Gilmer, Gary D. c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604
12. Howrey, Curtis 40 Las Flores Dr.
Chula Vista, CA 91910
13. Hayden-Hakes, Megan E. c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
14. Kuhn, Robert 11 Birch Circle, Unit #1
Colchester, CT 06415
15. McNeal, Kimberly 2942 W. 60th Drive
Merrillville, IN 46410
16. McDonald, Steven 66 South Wynstone Drive
North Barrington, IL 60010
17. Mizialko, Clifford 9 Sandpiper Lane
Hawthorne Woods, IL 60047
18. Murphy, Celeste 856 Oakwood Ave.
Lake Forest, IL 60045
19. Pantelis, Daniel 13 Victoria Lane
Lincolnshire, IL 60069
20. Peters, Richard J. c/o Cahill Gordon & Reindel, LLP
80 Pine Street
New York, NY 10005
21. Robin, Kenneth 950 North Michigan Ave.
Apt. 4703
Chicago, IL 60611
22. Rodemoyer, Carin 5700 Crestview Drive
Western Springs, IL 60558

⁴ This witness will be offered as an expert.

- | | | |
|-----|----------------------|---|
| 23. | Rybak, Walter | 508 Leonard St.
Park Ridge, IL 60068 |
| 24. | Schneider, Thomas | 1605 Buckthorn Dr.
Hoffman Estates, IL 60192 |
| 25. | Schoenholz, David A. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 26. | Stephens, Brian | 345 Old Sutton Rd.
Barrington, IL 60010 |
| 27. | Timmons, John | c/o Mountain West Mortgage
3700 S. Russell, Suite 114
Missoula, MT 59801 |
| 28. | Valverde, Jessie | 548 Curlew Road
Livermore, CA 94551 |
| 29. | Vozar, Joseph A. | c/o Eimer Stahl
224 S. Michigan Ave, Suite 1100
Chicago, IL 60604 |
| 30. | Wieck, Maria* | c/o Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111 |

*This witness should only be contacted through Coughlin Stoia Geller Rudman & Robbins LLP.

Plaintiffs may call live the following witnesses:

- | Witness | Address |
|-----------------------|--|
| 1. Anderson, Dan | 383 Country Oak Ln.
Inverness, IL 60060 |
| 2. Connaughton, James | 1600 Meadow Lane
#107
Bannockburn, IL 60015 |
| 3. Cunningham, Curt | 1100 Hillcrest Avenue
Fox River Grove, IL 60021 |

- | | |
|------------------------------|--|
| 4. Curtin, Kathleen Kelly A. | 122 W. 3rd Street
Hinsdale, IL 60521 |
| 5. Hicks, Stephen | 1228 Gregory Ave.
Wilmette, IL 60091 |
| 6. Nelson, Kay | 1581 West Adamy Court
Addison, IL 60101 |
| 7. Sesterhenn, Peter Alan | 1220 Canterbury Circle
Libertyville, IL 60048 |
| 8. Sodeika, Lisa | 15 Pentwater Drive
South Barrington, IL 60010 |
| 9. Stroom, Craig A. | 334 Fairview Ave.
Deerfield, IL 60015 |

Plaintiffs intend to call the following witnesses via video deposition testimony:⁵

- | Witness | Address |
|--------------------------------|--|
| 1. Allcock, Robin | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 2. Cross, Charles ⁶ | c/o Gordon Thomas Honeywell
Malanca Peterson & Daheim LLP
Wells Fargo Plaza
1201 Pacific Avenue, Suite 2100
Tacoma, WA 98402 |
| 3. Ekholdt, Per | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |
| 4. Friedrich, Douglas | c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005 |

⁵ In the event that any of the listed witnesses becomes available, plaintiffs will call the witness live.

⁶ This witness will be offered as a non-retained expert.

5. Hennigan, Ned M. c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
6. Hueman, Dennis 1806 Avenida Salvador
San Clemente, CA 92672
7. Kauffman, James 1069 Bald Eagle Dr.
Marco Island, FL 34145
8. Levy, Louis c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
9. Little, David 11506 Hammock Oaks Ct.
Lithia, FL 33547
10. Makowski, Paul 3302 Leamington Lane
Charlotte, NC 28226
11. Markell, Helen E. 876 Canyon View Drive
Laguna Beach, CA 92651
12. May, Todd 90 S. Seventh St.
4200 Wells Fargo Senter
Minneapolis, MN 55402
13. O'Han, Robert c/o Cahill Gordon & Reindel LLP
80 Pine Street
New York, NY 10005
14. Posner, Kenneth c/o Allen & Overy LLP
1221 Avenue of the Americas
New York, NY 10020
15. Walker, Kenneth 1224 Gatesville Rd.
Amhurst, VA 24521
16. Walter, Lewellyn 1199 N. Terry St.
Eugene, OR 97402

DATED: January 15, 2009

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Michael J. Dowd
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PATRICK J. COUGHLIN
MICHAEL J. DOWD
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LAWRENCE G. SOICHER
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212/355-6900 (fax)

Attorneys for Plaintiff

Exhibit 13

Plaintiffs' witness list

Page 1 of 1

Newville, Josh

From: Luke Brooks [LukeB@csgrr.com]
Sent: Saturday, January 17, 2009 6:54 PM
To: Newville, Josh; Best, Landis C.; Cameron Baker
Cc: Spence Burkholz
Subject: Plaintiffs' witness list

Josh,

We inadvertently left James Bernstein off of the witness list attached to our draft to send Thursday. We will send you an amended list including Mr. Bernstein early next week.

Luke

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1/18/2009

Exhibit 14

MILBANK, TWEED, HADLEY & McCLOY LLP

1 CHASE MANHATTAN PLAZA

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FAX: 813-3595-2790

HONG KONG
852-2971-4888
FAX: 852-2840-0792

SINGAPORE
65-6428-2400
FAX: 65-6428-2500

August 26, 2004

VIA FACSIMILE 415-288-4534

Luke Brooks, Esq.
Monique Winkler, Esq.
Lerach Coughlin Stoia Geller
Rudman Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111

Re: *Lawrence E. Jaffe v. Household International, Inc., et al.*
Case No. 02 Civ. 5893 (N.D. Ill.)

Dear Counsel:

As indicated in our letter of August 18, 2004, I write to inform you of the Household Defendants' positions regarding items taken under advisement during the August 10, 2004 and August 12, 2004 meet and confer teleconferences.

Plaintiffs have stated that they disagree with the Household Defendants' objection to the "Relevant Time Period" and "reserve the right to move to compel production of documents from the Relevant Time Period" as Lead Plaintiffs have defined it.¹ With respect to the definition of the Relevant Time Period, further discussed at the August 12, 2004 meet and confer, the Household Defendants will agree to produce non-privileged documents created after the proposed class period, where relevant, that relate to Household's lending practices or reaging practices during the proposed class period or the restatement, if any, but only to the extent such documents have already been collected or may be readily gathered in conjunction with the collection of documents created during the proposed class period. As a general matter, where the Household Defendants have agreed to produce documents concerning loans secured by real

1. August 13, 2004 letter from Monique Winkler, Esq. to Stacey Rappaport, Esq., Michael Berg, Esq., Atara Miller, Esq., and L. Anthony Pellegrino, Esq.

- 2 -

property or lending practices, the Household Defendants will produce documents concerning real estate secured loans originated at Household's United States retail consumer lending branches.

The following are the Household Defendants' responses to Lead Plaintiffs' positions concerning specific document requests:

Request No. 3 The Household Defendants will produce subpoenas for documents issued to Household by the SEC or other state or federal administrative or regulatory agencies or departments related to Household's lending practices, reaging practices, or restatement, if any.

Request No. 6 The Household Defendants have considered Lead Plaintiffs' suggestion that the Household Defendants produce sample loan documents for loans secured by real property from 100-150 branches that would be identified by Lead Plaintiffs. The Household Defendants will provide sample loan forms for loans secured by real property for each state.

Request No. 8 As the Household Defendants clarified during the August 10, 2004 teleconference, the production of documents in response to this request is ongoing. As part of the continued production of materials produced to the SEC or other state or federal administrative or regulatory agency or department, Lead Plaintiffs will receive additional organizational charts that the Household Defendants believe sufficiently identify at least the majority of persons referenced in the documents produced.

Request No. 12 By September 1, 2004, the Household Defendants will produce responsive documents concerning communications to or from Steve Matasek describing the Vision system, its capabilities, and how Vision was used. Steve Matasek is the employee identified as Household's Rule 30(b)(6) witness for Vision-related matters. In addition, the Household Defendants will produce analyst reports and press releases concerning the Vision system in Household's possession, if any, despite the fact that such documents are in the public domain and equally available to Lead Plaintiffs.

Request No. 13 The Household Defendants have considered Lead Plaintiffs' proposed compromise. We agree to the exclusion of individual employee incentives and will produce non-privileged documents, if any, concerning incentive programs or promotions for Household management or employees in Household's United States retail consumer lending branch network.

Request No. 14 Upon further investigation, the Household Defendants confirm that Lead Plaintiffs' request would require a review of every Household personnel file related to business units involved in "lending or treatment of loan delinquencies" during the Relevant Time Period and thus would be unduly burdensome. Lead Plaintiffs should suggest a compromise that would address this issue and the Household Defendants' other objections.

Request No. 15 Because Lead Plaintiffs still have not adequately explained how the documents sought in this request are relevant, the Household Defendants do not believe that Lead Plaintiffs have adequately addressed the Household Defendants' objections.

Request No. 17 The Household Defendants will produce non-privileged documents and communications, if any, relating to work performed by KPMG in connection with the restatement, the March 12, 2002 report referenced in the SEC Cease and Desist Order, and the validation of Household's reserves.

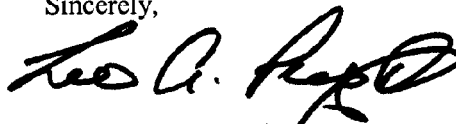
- 3 -

Request No. 18 The Household Defendants will produce documents sufficient to identify the amount of consulting work performed by Arthur Andersen, if any, and the compensation received by Arthur Andersen in connection with such consulting work done during the Relevant Time Period.

Request No. 19 The Household Defendants will produce responsive documents concerning compensation paid by Household or Individual Defendants to Arthur Andersen in connection with work performed by Arthur Andersen regarding Household's restatement of earnings, lending practices, reaging, and accounting treatment of credit card agreements. Additionally, the Household Defendants will produce documents concerning compensation received by Arthur Andersen in connection with consulting work done during the Relevant Time Period. The Household Defendants will undertake to determine whether Arthur Andersen performed any work for the Individual Defendants during the Relevant Time Period and, if so, produce documents concerning compensation paid.

Request No. 29 The Household Defendants are still considering whether their objections can be limited in scope.

Sincerely,



L. Anthony Pellegrino

Copies to:

Marvin A. Miller, Esq.	Via Facsimile	312-782-4485
Lucia Nale, Esq.	Via Facsimile	312-701-7711
Stanley A. Parzen, Esq.	Via Facsimile	312-701-7711
Adam Deutsch, Esq.	Via Electronic Mail	