

KE

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)
Situating,)
Plaintiff,)
vs.) Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et)
al.,)
Defendants.)

CLASS ACTION

FILED
JUN - 6 2005
MICHAEL W. DOBBINS
CLERK, U. S. DISTRICT COURT

DECLARATION OF LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS'
MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO PRODUCE SOURCE
LOGS FOR DOCUMENTS PRODUCED IN THIS LITIGATION

I, LUKE O. BROOKS, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. On August 4, 2004, Monique Winkler, Sylvia Sum, Lori Fanning and I met and conferred with the defendants through counsel Douglas Henkin, Michael Berg and Stacey Rappaport regarding various outstanding discovery issues. During the call I requested that defendants provide source logs and explained that source logs would facilitate the ease of litigation and move the case forward much faster.

3. On October 21, 2004, Azra Mehdi, Sylvia Sum and I met and conferred with the defendants through counsel Landis Best and Craig Kesch and Adam Deutsch regarding various outstanding discovery issues. During the call I again requested that Household provide the source of the documents being produced. I also explained to counsel for Household that lead plaintiffs' request was reasonable based upon the size and scope of the document production in this matter. Counsel for Household stated that they would research this issue and respond shortly.

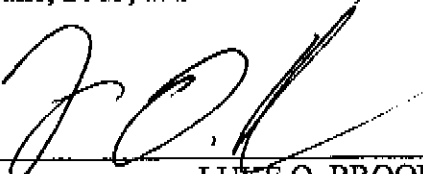
4. I am informed and believe that on November 2, 2004 Azra Mehdi, Monique Winkler and Sylvia Sum of my firm met and conferred with defendants through counsel Landis Best and Craig Kesch to discuss lead plaintiffs' request that Household provide the source of documents produced. Counsel for Household stated that they had researched this issue, and did not see an obligation to produce a source log.

5. Attached are true and correct copies of the following exhibits:

- Exhibit 1: *Cokenour v. Household Int'l*, Case No. 02 C 7921, Minute Order dated June 10, 2004;
- Exhibit 2: Letter from Sylvia Sum to L. Anthony Pellegrino dated July 30, 2004;
- Exhibit 3: Letter from L. Anthony Pellegrino to Sylvia Sum dated August 3, 2004;
- Exhibit 4: Letter from Monique Winkler to Douglas Henkin, Stacey Rappaport and Michael Berg dated August 5, 2004;
- Exhibit 5: Letter from Stacey J. Rappaport to Monique Winkler dated August 9, 2004;
- Exhibit 6: Letter from Monique Winkler to L. Anthony Pellegrino dated August 27, 2004;
- Exhibit 7: Letter from Monique Winkler to Thomas J. Kavalier, Peter Sloane, Landis Best, David Owen, Craig Kesch, and Joshua Greenblatt dated October 8, 2004;
- Exhibit 8: Emails between Sylvia Sum and Landis Best dated April 15, 2005;
- Exhibit 9: Letter from Sylvia Sum to Landis Best dated February 1, 2005;
- Exhibit 10: October 19, 2004 Supplemental Order to Order Setting Initial Case Management Conference in Civil Cases Before Judge William Alsup;
- Exhibit 11: *In re Oracle Corp. Sec. Litig.*, Case No. C-01-0988-MJJ (N.D. Cal.), Amended Order Setting a Discovery Plan;
- Exhibit 12: Letter from Stephen W. Bucher to Shawn Williams regarding *Yue v. New Focus, Inc.*, Case No. CV 808031 (Santa Clara Sup. Ct.) dated November 20, 2003;
- Exhibit 13: Letter from Peter T. Snow to Sylvia Wahba Keller regarding *In re CV Therapeutics, Inc. Sec. Litig.*, No. C-03-3709-SI (N.D. Cal.) dated January 25, 2005;
- Exhibit 14: Letter from L. Anthony Pellegrino to Luke O. Brooks dated August 25, 2004;
- Exhibit 15: Emails between Sylvia Sum and Craig Kesch dated March 16, 2005 and March 21, 2005; and

Exhibit 16: Letter from Sylvia Sum to Craig Kesch dated March 30, 2005.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6th day of June, 2005, at San Francisco, California.



LUKE O. BROOKS

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Exhibit 1

Minute Order Form (06/97)

United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge	Samuel Der-Yeghiayan	Sitting Judge if Other than Assigned Judge	
CASE NUMBER	02 C 7921	DATE	6/10/2004
CASE TITLE	Cokenour vs. Household Intl		

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd party plaintiff, and (b) state briefly the nature of the motion being presented.]

MOTION:

DOCKET ENTRY:

- (1) ☐ Filed motion of [use listing in "Motion" box above.]
- (2) ☐ Brief in support of motion due _____.
- (3) ☐ Answer brief to motion due _____. Reply to answer brief due _____.
- (4) ☐ Ruling/Hearing on _____ set for _____ at _____.
- (5) ☐ Status hearing[held/continued to] [set for/re-set for] on _____ set for _____ at _____.
- (6) ☐ Pretrial conference[held/continued to] [set for/re-set for] on _____ set for _____ at _____.
- (7) ☐ Trial[set for/re-set for] on _____ at _____.
- (8) ☐ [Bench/Jury trial] [Hearing] held/continued to _____ at _____.
- (9) ☐ This case is dismissed [with/without] prejudice and without costs[by/agreement/pursuant to]
☐ FRCP4(m) ☐ Local Rule 41.1 ☐ FRCP41(a)(1) ☐ FRCP41(a)(2).
- (10) ☒ [Other docket entry] Plaintiffs' motion to compel KPMG's production of documents is granted. Plaintiff's motion to compel defendant Household to produce the index of the documents which Household provided the S.E.C. and/or state regulators is granted. Household's motion to strike plaintiff's reply and corrected reply memoranda is granted.
- (11) ☐ [For further detail see order (on reverse side of/attached to) the original minute order.]

No notices required, advised in open court.		number of notices	<div style="border: 1px solid black; padding: 5px;"> Document Number 111 </div>
No notices required.		JUN 15 2004	
Notices mailed by judge's staff.		date docketed	
Notified counsel by telephone.		JXM	
<input checked="" type="checkbox"/> Docketing to mail notices.		docketing deputy initials	
Mail AO 450 form.		date mailed notice	
Copy to judge/magistrate judge.		mailing deputy initials	
MW	courtroom deputy's initials	<div style="border: 1px solid black; padding: 5px;"> U.S. DISTRICT COURT CLERK Date/time received in central Clerk's Office 2004 JUN 10 PM 5:07 </div>	

FILED

Exhibit 2



Sylvia Sum
sylvias@lcsr.com

SAN FRANCISCO
SAN DIEGO
LOS ANGELES
WASHINGTON, DC
HOUSTON
PHILADELPHIA

July 30, 2004

VIA FACSIMILE

L. Anthony Pellegrino, Esq.
MILBANK TWEED HADLEY
& McCLOY LLP
1 Chase Manhattan Plaza
New York, NY 10005-1413

Re: *Jaffe v. Household International, Inc.*
Case No. 02-CIV-5893 (N.D. Ill.)


Dear Anthony:

We are in receipt of the four CDs Bates-stamped HHS 01850580-HHS 01892579.

Your July 28, 2004 letter stated that the documents on those disks are in response to Plaintiffs' First Request for Production of Documents to Household Defendants but fails to identify to which request they are responsive. Please let us know which request the documents are responsive to and also when you plan on producing source logs or custodian logs for the documents thus far produced.

Furthermore, please inform us on when you intend to produce the remaining approximately 430,000 pages Household already produced to the SEC.

Very truly yours,



Sylvia Sum

SS:jc

cc: Azra Mehdi

t:\cases\household intl\corres\ltp pellegrino 07-30-04.doc



Exhibit 3

MILBANK, TWEED, HADLEY & McCLOY LLP

1 CHASE MANHATTAN PLAZA

NEW YORK, N.Y. 10005-1418

LOS ANGELES
213-892-4000
FAX: 213-829-5083

PALO ALTO
650-739-7000
FAX: 650-739-7100

WASHINGTON, D.C.
202-835-7500
FAX: 202-835-7555

LONDON
44-207-445-3000
FAX: 44-207-445-3055

212-530-5000
FAX: 212-530-5219

Litigation
L. Anthony Pellegrino
1 Chase Manhattan Plaza
New York, NY 10005
T: 212-530-5140 F: 212-522-5140
apellegrino@milbank.com
www.milbank.com

FRANKFURT
49-69-7593-7170
FAX: 49-69-7593-5303

TOKYO
81-3-5504-1050
FAX: 81-3-5505-2790

HONG KONG
852-2971-4868
FAX: 852-2640-0792

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

August 3, 2004

VIA FACSIMILE 415-288-4534

Sylvia Sum, Esq.
Lerach, Coughlin, Stoia & Robbins, LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111

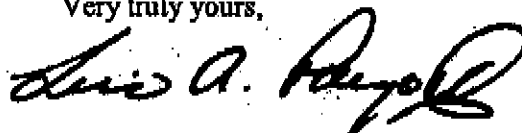
Re: **Jaffe v. Household International, Inc. et al.**

Dear Sylvia:

We write in response to your letter of July 30, 2004. The Household Defendants' production complies with Fed. R. Civ. P. 34. We are not obligated to, and will not, provide you with "source logs or custodian logs."

HHS 01850580-HHS 01892579 are documents Household produced to the SEC. As we have stated previously, we will continue to produce documents on a rolling basis, including 15 to 20 CDs later this week.

Very truly yours,



L. Anthony Pellegrino

Copies to:

Marvin A. Miller, Esq.
Lucia Nale, Esq.
Adam Deutsch, Esq.

Via Facsimile
Via Facsimile
Via Electronic Mail

312-782-4485
312-701-7711

Exhibit 4



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

Monique Winkler
moniquow@lerachlaw.com

August 5, 2004

VIA FACSIMILE

Douglas Henkin, Esq.
Stacey Rappaport, Esq.
Michael Berg, Esq.
Milbank, Tweed, Hadley & McCoy LLP
1 Chase Manhattan Plaza
New York, NY 10005

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

Dear Counsel:

This letter will summarize the August 4, 2004 meet and confer teleconference wherein we discussed certain Rule 30(b)(6) depositions and Household's Responses and Objections to Plaintiffs' First Request for Production of Documents, in particular, Household's General Responses and Objections.

With respect to the Rule 30(b)(6) deposition regarding the Vision system, which plaintiffs noticed on June 8, 2004, you identified Steve Matasek as the deponent during the July 14, 2004 meet and confer. On July 15, 2004, you identified available dates, including the week of August 17, and on July 23 clarified that Mr. Matasek would testify on all Vision related topics. In a July 26, 2004 letter, plaintiffs selected one of the available dates, August 19, 2004. You did not respond. On yesterday's call, you advised for the first time that all documents will not be produced prior to August 19, and consequently the deposition will again be postponed. You will directly start producing related documents and that production will be completed by September 1, 2004. You will also advise Mr. Matasek's availability for deposition immediately after September 8, 2004. Please do so on or before August 12, 2004.

You also advised that you would produce certain documents related to the 30(b)(6) deposition of Christine Cunningham, including the corporate document policy and e-mail retention policy. Plaintiffs requested that you provide available dates in August for her deposition. Please also do so on or before August 12, 2004.

We also discussed certain of Household's general objections to plaintiffs' first request for production. Specifically, we addressed the following general objections:



Douglas Henkin, Esq.
Stacey Rappaport, Esq.
Michael Berg, Esq.
August 5, 2004
Page 2

General Objection 3. You agreed that wholly owned subsidiaries of Household International are under its control and that you would produce responsive documents in the possession of such wholly owned subsidiaries. You did not agree that subsidiaries of HSBC are under the control of Household International; however, you indicated that documents were not transferred to HSBC in the merger. Please identify the subsidiaries for which production will be made by reference to HHS 02127176 -- 02127181. In the event all subsidiaries for the relevant time period are not listed, please identify any other subsidiaries.

General Objection 4. With respect to privileged documents, you will provide a privilege log identifying any privileges asserted. You were unable or unwilling to advise as to the existence of a joint defense agreement or to explain the common interest privilege included in your objection.

General Objection 5. We will discuss your undue burden objections in connection with the discussion of your responses to specific requests.

General Objection 8. In responding to the requests, you defined Household as Household International, Inc. and Household Finance Corporation. Please confirm whether your definition included Beneficial Corporation and/or Household Realty Corporation.

General Objection 10. In responding to the requests, you defined Andersen as Arthur Andersen LLP.

General Objection 11. In responding to the requests, you defined HSBC as HSBC Holdings plc.

General Objection 12. In responding to the requests, you defined KPMG as KPMG LLP.

General Objection 14. We did not discuss your objection in detail to the definition of the terms "Person" or "Persons" as you indicated that the terms do not appear in the text of any request.

General Objection 15. You objected to the inclusion of "course of conduct" in the definition of the terms "Policy" or "Policies" because it was ambiguous and may reflect something that is not a policy. You did not object to the remainder of the definition.

General Objection 16. With respect to former employees, you explained that you would not be seeking documents directly from former employees. In other words, you would not produce documents that a former employee maintained in a personal file at her home. You will however produce responsive documents created or maintained by former employees during their employment



Douglas Henkin, Esq.
Stacey Rappaport, Esq.
Michael Berg, Esq.
August 5, 2004
Page 3

that are in defendants' possession. Also, you will not seek documents from employees of defendants that are not employed by Household, for example, defendants' housekeepers.

General Objection 17. You will get back to us by Tuesday August 10, 2004 regarding plaintiffs' definition of the "Relevant Time Period."

General Objection 19. It is your belief that you have the option of producing documents either as they are kept in the ordinary course of business or in categories. Going forward, you will produce documents as they are kept in the ordinary course of business unless you advise otherwise. Despite our request, you refused to provide source logs or custodian logs on the basis of the attorney work product privilege.

General Objection 20. Your objection was based on your belief that Instruction No. 3 prevented you from producing copies unless the original document was not in your custody. You reserved your right to produce an original or a copy.

General Objection 21. With respect to Instruction No. 5, you refused to fully explain your objection. You stated that you would meet and confer on your privilege log at the time it is produced and that the log would comply with the Federal Rules of Civil Procedure. With respect to Instruction No. 7, you maintained that you have no obligation to identify documents destroyed prior to a preservation order that you know were destroyed. You stated that to do so would be unduly burdensome. You also disagreed with plaintiffs' suggestion that documents related to the present case had been destroyed.

General Objection 22. With respect to Instruction No. 6, any documents redacted on the basis of privilege will appear in your privilege log; documents redacted for reasons of non-responsiveness will not. At this time, you are unable to identify any other reason why documents would be redacted. You will provide timely notice if you intend to redact documents on any other basis.

Because you had only reserved an hour for this meet and confer, we agreed to continue the meet and confer on Monday August 9 at 2 p.m. EST. We want to complete the meet and confer at that time and request that you reserve sufficient time.

Sincerely,

A handwritten signature in black ink, appearing to read "Monique Winkler".

Monique Winkler



Douglas Henkin, Esq.
Stacey Rappaport, Esq.
Michael Berg, Esq.
August 5, 2004
Page 4

MCW:mog

cc: Adam B. Deutsch
Marvin A. Miller, Esq.
Azra Z. Mehdi, Esq.

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Exhibit 5

MILBANK, TWEED, HADLEY & McCLOY LLP

1 CHASE MANHATTAN PLAZA

NEW YORK, N.Y. 10005-1413

212-630-6000

FAX: 212-630-6219

Stacey J. Rappaport
Associate
DIRECT DIAL NUMBER
(212) 530-5347
Fax: (212) 822-5347
E-MAIL: srappaport@milbank.com

FRANKFURT

49-69-7593-7170

FAX: 49-69-7593-8303

TOKYO

81-3-3504-1050

FAX: 81-3-3505-2790

HONG KONG

852-2871-4888

FAX: 852-2840-0792

SINGAPORE

65-6426-2400

FAX: 65-6426-2500

August 9, 2004

VIA FACSIMILE 415-288-4534

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

Re: Lawrence E. Jaffe Pension Plan v. Household, et al. 02-C-5893 (N.D. Ill.)

Dear Monique:

We write in response to your letter of August 5, 2004, which is rife with mischaracterizations. We had hoped that the meet-and-confer process would not result in such unproductive posturing but, unfortunately, plaintiffs seem to be intent on creating a false paper record. In light of your August 5 letter and the way plaintiffs chose to approach the meet-and-confer on August 4, 2004, it is clear that the call scheduled for August 9, 2004 at 2:00 p.m. will not be productive.

The Household Defendants' responses and objections to plaintiffs' document requests are the Household Defendants' responses and objections, as they are written, and plaintiffs' attempt to restate them is neither necessary nor proper. Nothing that we discussed on August 4, 2004 or in this letter is intended to modify the Household Defendants' responses and objections to plaintiffs' documents request; all of those responses and objections still stand. Given that you spent virtually all of last week's meet and confer reiterating the Household Defendants' general responses and objections, we cannot reserve what plaintiffs deem to be "sufficient time" to complete the meet and confer without knowing what issues you believe exist. The most efficient course of action would be for plaintiffs to send us a letter detailing the areas

- 2 -

of disagreement based on the Household Defendants' responses and objections (and by doing this we do not mean simply asserting that anything other than an unconditional agreement with a request or instruction as written is improper). As a result, we insist that you provide us with your position in writing at least 24 hours prior to any further meet and confer. Please limit the issues addressed to those that are important and truly subject to disagreement. We are available to meet and confer on August 10, 2004 at 2:00 p.m. If that is not sufficient time for you to put your position in writing, please suggest alternative dates and times.

Your August 5 letter states that we did not respond to your July 26, 2004 letter regarding Mr. Matasek's availability to be deposed on August 19, 2004. That is false. We responded by e-mail dated August 2, 2004 stating that we wanted to discuss the noticed 30(b)(6) depositions on the meet and confer. Which, of course, we did. Your August 5 letter states that we informed you "for the first time" on the meet and confer that "all documents would not be produced" by August 19. That is also false. We have told you repeatedly that documents would be produced in response to plaintiffs' first request for production on a rolling basis. To date, over 2 million pages of documents have been produced. The Household Defendants never promised to complete their document production by August 19 and never promised to produce any Vision-related documents by that date or any other date.

The Household Defendants offered, subject to their responses and objections to plaintiffs' document requests, to produce documents relating to the Vision system on an expedited basis in the interest of assisting plaintiffs in conducting an efficient examination of Mr. Matasek. You agreed during the August 4 meet and confer that this would be preferable to taking Mr. Matasek's deposition before Vision-related documents were produced. We informed you that it would take a few weeks to complete the production of such documents but that we would begin producing such documents next week. We do not know what you mean when you say we will begin producing documents "directly;" when we said we would begin producing documents next week, we meant just that and plaintiffs agreed to this procedure. The Household Defendants did not "postpone" any deposition, because there was none scheduled. Moreover, plaintiffs expressed their desire to depose Mr. Matasek after receiving the Household Defendants' Vision-related production, which the Household Defendants plan to complete on or before September 1, even if that meant that Mr. Matasek would not be deposed until September 8, 2004 or later. You requested that we give you a week to review the documents before producing Mr. Matasek for his deposition, and we agreed at your request to inquire as to his availability starting September 8. We plan to let you know possible dates for Mr. Matasek's deposition next week, but not necessarily by August 12.

Your description of our conversation concerning Ms. Cunningham is inaccurate. We told you that (i) we would produce on August 4 an e-mail retention policy (along with the corporate document retention policy and certain organization charts you had requested), and (ii) we would inquire as to Ms. Cunningham's availability, with the understanding that plaintiffs are eager to proceed as early as possible with her deposition, but that scheduling witnesses and

- 3 -

counsel for August depositions may be problematic. We made no other representations concerning Ms. Cunningham or any documents related to your request for production concerning Household's e-mail system.

The following responds to the remaining assertions in your letter:

General Objection No. 3

We did not agree that wholly owned subsidiaries of Household International are under its control and that we would produce responsive documents in the possession of such wholly owned subsidiaries. We agreed to comply with the Federal Rules of Civil Procedure and produce documents in the possession, custody, or control of Household International, Inc. We told you that some of the requested documents may reside in the files of wholly-owned subsidiaries and, to the extent we did not object to plaintiffs' requests, we would produce such documents. We are not under an obligation to identify the subsidiaries from which we will produce documents. Your request for "identification of any other subsidiaries" other than the subsidiaries listed on HHS 02127176-02127181 is not an appropriate document request.

General Objection No. 4

The Household Defendants' privilege log will comply with the Federal Rules of Civil Procedure and will identify any privileges asserted at that time.

General Objection No. 5

The Household Defendants' objection speaks for itself.

General Objection No. 8

We did not define "Household" as "Household International, Inc. and Household Finance Corporation." Plaintiffs first request for production was directed to Household International, Inc. and Household Finance Corporation.

General Objection No. 10

The Household Defendants' objection speaks for itself.

General Objection No. 11

The Household Defendants' objection speaks for itself.

- 4 -

General Objection No. 12

The Household Defendants' objection speaks for itself.

General Objection No. 14

The Household Defendants' objection speaks for itself.

General Objection No. 15

The Household Defendants' objection speaks for itself.

General Objection No. 16

The Household Defendants' objection speaks for itself. As we have repeatedly stated, the Household Defendants will produce documents in their possession, custody, or control but will not seek documents from former employees.

General Objection No. 17

The Household Defendants will respond to your request that they produce documents created outside of the proposed class period on August 10, 2004.

General Objection No. 19

The Household Defendants' objection speaks for itself. The Household Defendants will comply with the Federal Rules of Civil Procedure and will not produce source logs or custodian logs.

General Objection No. 20

The Household Defendants' objection speaks for itself. The Household Defendants will comply with the Federal Rules of Civil Procedure.

General Objection No. 21

The Household Defendants explained their objection to this request in their responses and objections and on the August 4, 2004 call with plaintiffs. The Household Defendants did not agree to meet and confer on the privilege log at the time it is produced. *If* plaintiffs have any issues regarding the Household Defendants' privilege log *when* that document is produced, plaintiffs should address any such issues with the Household Defendants *after* reviewing the privilege log. The Household Defendants will address any allegations of

- 5 -

document destruction at the time such allegations are properly raised, if any. It is improper to make baseless accusations and use those accusations to try to impose discovery obligations on the Household Defendants beyond those contained in the Federal Rules of Civil Procedure.

General Objection No. 22

The Household Defendants' objection speaks for itself. The Household Defendants' privilege log will comply with the Federal Rules of Civil Procedure, and documents redacted for privilege will appear on that privilege log. We think it obvious that documents redacted for non-responsiveness will not appear on that privilege log. If the Household Defendants decide to redact any documents for any other reason, defendants will notify plaintiffs of the reason in advance of such redaction. On the August 4 call, neither plaintiffs nor the Household Defendants were able to identify any reason why documents might be redacted other than non-responsiveness or privilege. We note that the reason we did not make further progress in the meet and confer was your insistence of extensively debating hypothetical issues such as possible reasons for redacting documents other than privilege or non-responsiveness and the theoretical adequacy of privilege logs that have not yet been served. In the interest of efficiency when we continue the meet and confer, if we view any topic you might raise as not ripe for discussion, we will simply say so and terminate the discussion of that particular topic.

We look forward to receiving your letter outlining the areas of disagreement with defendants' responses and objections at least 24 hours in advance of our next call.

Very truly yours,



Stacey J. Rappaport

Copies to:

Azra Mehdi, Esq.	Via Facsimile	415-288-4534
Luke Brooks, Esq.	Via Facsimile	415-288-4534
Marvin A. Miller, Esq.	Via Facsimile	312-782-4485
Lori Fanning, Esq.	Via Facsimile	312-782-4485
Adam Deutsch, Esq.	Via Electronic Mail	

Exhibit 6



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LOS ANGELES • NEW YORK • BOCA RATON
WASHINGTON, DC • HOUSTON
PHILADELPHIA • SEATTLE

Monique Winkler
moniquew@lerachlaw.com

August 27, 2004

VIA FACSIMILE

L. Anthony Pellegrino, Esq.
Milbank, Tweed, Hadley & McCoy LLP
1 Chase Manhattan Plaza
New York, NY 10005

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

Dear Anthony:

I write regarding several outstanding discovery issues related to Household's Responses and Objections to Plaintiffs' First Request for Production of Documents ("Household's Responses"), including those raised in your August 18 and 26, 2004 letters, and to summarize the meet and confer process regarding Household's Responses:

Request No. 3 Plaintiffs' suggested compromise was in no way intended to limit the types of documents sought, but rather the topics; specifically, the compromise was to limit the topics to predatory lending, reaging, and the restatement. In your August 26, 2004 letter, you limited the types of documents that the Household Defendants will produce to subpoenas. Before plaintiffs can accept this compromise, we need to know whether the SEC or other state or federal administrative or regulatory agencies or departments sought documents from Household in any manner other than through subpoena. Plaintiffs request that the Household Defendants advise as to whether the Household Defendants are willing to answer this question, and if so, by when.

Request No. 6 Both the document request and the compromise proposed by plaintiffs seek a more comprehensive overview of the loan documents used by Household for loans secured by real property than that offered in your August 26, 2004 letter. Plaintiffs seek more than just one sample of forms per state. In 1999, Household maintained over 1400 branches. Moreover, your letter provides no information regarding the time period from which the proposed sample of loan documents are to be drawn—do you intend to provide multiple copies of the same form if it changed over time? Please let us know if and when we can expect this additional information.



L. Anthony Pellegrino, Esq.

August 27, 2004

Page 2

Plaintiffs are at a disadvantage on this issue due to lack of definitive knowledge regarding Household's operations and corporate and organizational structure. Plaintiffs lack this knowledge due to the Household Defendants' refusal to designate 30(b)(6) witnesses to testify on subject matters 1 and 2 set forth in plaintiffs' June 8, 2004 notice. Lacking this knowledge, plaintiffs cannot accept the Household Defendants' proposed production without reserving their rights. Nonetheless, plaintiffs accept the production proposed in your August 26, 2004 letter, but reserve their right to revisit this issue after the 30(b)(6) depositions and production.

Request No. 8 Your letter of August 26, 2004 indicates that "additional organizational charts that the Household Defendants believe sufficiently identify at least the majority of persons referenced in the documents produced" will be produced "[a]s part of the continued production of materials produced to the SEC or other state or federal administrative or regulatory agency or department." This compromise position is unacceptable to plaintiffs.

As plaintiffs explained in the meet and confer, plaintiffs need this information at the outset of discovery, not at some vague time in the future. Plaintiffs need to be able to identify individuals and the organizational structure at the time documents are reviewed – to do otherwise would be inefficient and counterproductive. Moreover, due to the manner of production, discussed in more detail later in this letter, your response in effect sends plaintiffs on a wild goose chase for the promised charts. Finally, it is impossible for plaintiffs to know whether the charts will sufficiently identify the individuals whose names appear on the produced documents.

Plaintiffs request that the Household Defendants advise them on or before September 3, 2004 whether they are willing to separately produce the documents referred to in your August 26, 2004 letter on or before September 10, 2004.

Request Nos. 11 and 12 On or before September 1, 2004, Household will produce the following: (1) documents that describe the Vision system; (2) documents that describe how the Vision system was used at Household; (3) documents that provide an overview of how the Vision system was modified to enhance its capabilities; (4) communications to and from Steve Matasek describing the Vision system, its capabilities and how it was used; and (5) analyst reports and press releases in Household's possession that concern the Vision system.

Request No. 13 Plaintiffs cannot accept the compromise production proposed in your August 26, 2004 letter. As the request makes clear, plaintiffs seek documents concerning incentive programs or promotions not just at the branch level, but at the management level. Moreover, the request is not limited to retail consumer lending. For example, plaintiffs seek documents concerning such promotions or programs within the collections arm of Household. Given plaintiffs' limited knowledge regarding Household's operations and corporate and organizational structure and given the Household Defendants' continued refusal to designate and produce a 30(b)(6) witness to testify on these subjects, plaintiffs must guess that the retail consumer lending branch network does not include collections.



L. Anthony Pellegrino, Esq.

August 27, 2004

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Request No. 14 Because the complaint includes allegations that employees were disciplined for refusing to adhere to what plaintiffs have alleged are improper practices, plaintiffs are not willing to compromise this request. The request is clear as written and seeks relevant documents.

Request Nos. 17 and 18 Plaintiffs maintain that all documents sought through the compromises suggested by plaintiffs during the meet and confer and memorialized in my letter of August 13, 2004 are relevant for several reasons, including (1) that audit work performed by companies such as KPMG and Arthur Andersen is not intended to be viewed or analyzed in a piecemeal fashion, but rather reviewed as a whole; and (2) that in their Initial Disclosures, the Household Defendants specifically state their intent to rely upon the following documents:

- a. Financial and operational results for Household and its subsidiaries, including interim and final financial reporting documents;
- b. KPMG's interim and final audit reports and related correspondence or communications; and
- c. Arthur Andersen's interim and final audit reports and related correspondence or communications.

Request No. 19 Plaintiffs accept the compromise proposed in your August 26, 2004 letter, but reserve their right to revisit this issue. Plaintiffs require additional information regarding the manner in which Arthur Andersen structured its audits. Plaintiffs have propounded a 30(b)(6) deposition notice and document requests on Arthur Andersen seeking this information.

Request No. 21 Plaintiffs again suggest as a way to narrow this request that the Household Defendants produce all documents that led to Household's adoption of the Best Practices Initiatives. To rephrase this suggested compromise, plaintiffs request that the Household Defendants produce all documents that caused, prompted or induced Household to adopt the Best Practices Initiatives.

Request No. 29 The Household Defendants are still evaluating whether they can limit their objections. Plaintiffs request that the Household Defendants advise them on or before September 3, 2004 whether they are willing to do so.

Additionally, it appears from the most recent exchange of correspondence that the parties are at an impasse with respect to Request Nos. 15, 23, 24, and 27.

With respect to Request Nos. 1, 2, 5, 7, 9, 10, 20, 22, 26, 30 and 31, plaintiffs expressly reserve their right to compel production of responsive documents until after a review of the documents produced by the Household Defendants. In the event the production is deficient, in



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August 27, 2004
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accordance with the Local Civil Rules of the United States District Court for the Northern District of Illinois, plaintiffs will discuss the deficiencies in the production with the Household Defendants prior to moving to compel.

Also, to summarize prior correspondence, plaintiffs agreed to reserve further discussion on Request Nos. 4 and 16 until after a review of the document production. Prior discussion and correspondence established that the parties are at an impasse with respect to Request Nos. 25 and 28.

Finally, there are two additional issues that plaintiffs consider critical at this stage of discovery: (1) the Relevant Time Period as set forth in plaintiffs' documents requests; and (2) the manner of production, including the identification of the source of documents and the categories to which the documents are responsive.

Relevant Time Period Plaintiffs recognize that the Household Defendants (1) agreed to provide documents for the period August 1, 1997 through the end of the proposed class period; (2) agreed to produce non-privileged documents created after the proposed class period with limitations, including "only to the extent that such documents have already been collected or may be readily gathered in conjunction with the collection of documents created during the proposed class period;" and (3) agreed to the Relevant Time Period to a certain extent with respect to Request No. 19. However, plaintiffs maintain that documents from the entire requested period are relevant. It appears the parties are at an impasse. If this is incorrect and the Household Defendants are willing to expand the temporal scope of their production with respect to additional requests, plaintiffs request that they do so on or before September 10, 2004. Otherwise, plaintiffs will move to compel production for the Relevant Time Period.

Manner of Production With respect to the manner of production, much of the Household Defendants' production to date has been virtually unusable, specifically the production of 30 CDs that include the following Bates ranges:

1. HHS 01850580-HHS 01892579,
2. HHS 0892580-HHS 02108579,
3. HHS 02116580-HHS 02127173,
4. HHS 02127234-HHS02127334,
5. HHS 02108364-HHS 02111554, and
6. HHS 02115346-HHD 02116579.

The CDs are not labeled other than to indicate Bates ranges. Additionally, as produced, the CDs provide no indication of origin, names of included files, or whether the CDs include documents



L. Anthony Pellegrino, Esq.

August 27, 2004

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from multiple files. Moreover, the CDs do not include indices and the information included on the CDs is not in text-searchable format. In sum, the much-hyped fact that the Household Defendants have produced over two million documents to date, is meaningless.

Despite plaintiffs' requests for additional information with respect to the production of the CDs, including that you identify the specific request(s) to which the documents are responsive, you have refused to provide any information regarding these documents other than to advise in your August 3, 2004 letter that HHS 01850580-HHS 01892579 "are documents Household produced to the SEC." In that same letter, you specifically stated that you "are not obligated to, and will not, provide [plaintiffs] with 'source logs or custodian logs.'"

Also, in an August 25, 2004 letter, you stated that the documents "have been produced as kept in the ordinary course of the Household Defendants' business except that, to the extent possible, documents have been produced ... in electronic format." You concluded with, "[t]hat is all Rule 34(b) requires." Plaintiffs dispute whether such production truly constitutes the production of documents as they are kept in the ordinary course of business. Rule 34 does not provide that documents may be reformatted and then produced. Moreover, even if the documents are maintained electronically in the ordinary course of business, it is unfathomable that the Household Defendants maintain their documents without any recognizable labeling or filing system.

Due to the manner of production, plaintiffs will be required to review every single page individually to make even the simplest determination of relevance. Furthermore, the manner of production makes determining whether the Household Defendants have produced any documents responsive to a specific request unduly difficult and burdensome. It will be impossible for plaintiffs to identify the source of many of the documents. In sum, the Household Defendants have not produced documents in a manner that facilitates the just, speedy, and efficient resolution of this dispute. For these reasons, plaintiffs intend to move to compel with respect to the manner or production.

Sincerely,

A handwritten signature in black ink, appearing to read 'Monique Winkler', written over a horizontal line.

Monique Winkler

MCW:

cc: Adam B. Deutsch, Esq.
Marvin A. Miller, Esq.
Azra Z. Mehdi, Esq.

t:\cases\household intl\corres\pellegrino_082704.doc

Exhibit 7



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

Monique Winkler
moniquew@lerachlaw.com

October 8, 2004

VIA FACSIMILE

Thomas J. Kavalier, Esq.
Peter Sloane, Esq.
Landis Best, Esq.
David Owen, Esq.
Craig Kesch, Esq.
Joshua Greenblatt, Esq.
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 Counsel:

I write regarding several discovery issues outstanding at the time Magistrate Judge Nolan instituted the merits stay.

I. Notice of Deposition of Household International, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6)

Plaintiffs request that the 30(b)(6) depositions of Household International, Inc. noticed on June 8, 2004 move forward. Please promptly provide the earliest possible new dates for the 30(b)(6) depositions of Steve Matasek (previously scheduled for September 10, 2004) and Christine Cunningham. The Household Defendants identified Mr. Matasek as the deponent to testify regarding the Vision system and Ms. Cunningham as the deponent to testify regarding Household's e-mail system.

Also, please identify and provide availability for individuals to testify regarding the remaining subject matter included in the June 8, 2004 notice, specifically:

1. Household's operations and corporate structure, including locations and operations of its subsidiaries, affiliates, divisions, departments and operating segments.



Thomas J. Kavalier, Esq.
Peter Sloane, Esq.
Landis Best, Esq.
David Owen, Esq.
Craig Kesch, Esq.
Joshua Greenblatt, Esq.
October 8, 2004
Page 2

2. The organizational hierarchy and employment structure of Household and its subsidiaries, affiliates, divisions, departments and operating segments, including its executive and management personnel, loan officers, branch managers, account representatives, collection representatives and customer care representatives.

3. The compensation, incentive programs and promotions for Household's executive and management personnel, including the Individual Defendants.

4. The compensation, incentive programs and promotions for Household's employees including loan officers, branch managers, account representatives, collection representatives and customer care representatives.

5. The location and description of all documents requested in Plaintiffs' First Request for Production of Documents to Household Defendants.

6. Household's document destruction, retention and/or alteration policy.

II. Plaintiffs' First Request for Production of Documents to Household Defendants

Prior to the August 30, 2004 status hearing, plaintiffs and the Household Defendants engaged in several meet and confer teleconferences regarding Household's Responses and Objections to Plaintiffs' First Request for Production of Documents ("Household's Responses to Request for Production"). For your convenience, this letter will summarize the meet and confer process to date, incorporating and referencing the following correspondence: (1) my August 13, 2004 letter (Exhibit A); (2) A. Pellegrino's August 18, 2004 letter (Exhibit B); (3) A. Pellegrino's August 26, 2004 letter (Exhibit C); and (4) my August 27, 2004 letter (Exhibit D).

With respect to Request Nos. 1, 2, 4, 5, 7, 9, 10, 16, 19, 20, 22, 26, 30 and 31, plaintiffs expressly reserved their right to compel production of responsive documents until after reviewing the documents responsive to these requests produced by the Household Defendants. *See Exhibits A-D.*

Plaintiffs await additional information from the Household Defendants regarding Request Nos. 3, 6, 8, 21, and 29. *See Exhibit D.* Given that these outstanding issues were originally identified over one month ago, plaintiffs request that the Household Defendants respond by the end of next week.



Thomas J. Kavaler, Esq.
Peter Sloane, Esq.
Landis Best, Esq.
David Owen, Esq.
Craig Kesch, Esq.
Joshua Greenblatt, Esq.
October 8, 2004
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The Household Defendants agreed to produce documents in response to Request Nos. 11 and 12 on or before September 1, 2004. *See* Exhibit C. Given that the production was to occur in just two days at the time the Court instituted the merits stay, plaintiffs request that production occur by the end of next week.

It appears that the parties have reached an impasse with respect to Request Nos. 13, 14, 15, 17, 18, 23, 24, 25, 27 and 28. *See* Exhibits A-D. Plaintiffs request that by the end of next week, the Household Defendants advise as to whether they disagree with this characterization, and if so, the Household Defendants' current position. Plaintiffs intend to move to compel production with respect to these requests in the event the parties truly have reached an impasse.

Plaintiffs also await a response from the Household Defendants regarding two additional critical issues related to Household's Responses to Request for Production: (1) the Relevant Time Period as set forth in plaintiffs' documents requests; and (2) the manner of production, including the identification of the source of documents and the categories to which the documents are responsive. *See* Exhibit D. Again, given that these two outstanding issues were originally identified over one month ago, plaintiffs request that the Household Defendants respond by the end of next week. We have additional issues related to the documents produced thus far that we would like to discuss with the Household Defendants.

Finally, plaintiffs request that by the end of next week, the Household Defendants advise as to whether present counsel's position on Household's Responses to Request for Production differs from the position taken by prior counsel, particularly regarding issues identified as at an impasse. In the event it does, plaintiffs are willing to continue to meet and confer.

III. Plaintiffs' First Set of Interrogatories Propounded to Defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar

Plaintiffs and the Household Defendants also met and conferred regarding the Household Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories. On August 30, 2004, Luke Brooks sent a letter memorializing the meet and confer and requesting additional



Thomas J. Kavalier, Esq.
Peter Sloane, Esq.
Landis Best, Esq.
David Owen, Esq.
Craig Kesch, Esq.
Joshua Greenblatt, Esq.
October 8, 2004
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information from the Household Defendants (Exhibit E). Plaintiffs request that the Household Defendants respond by the end of next week.

Very truly yours,

Monique Winkler

MW:mog
Enclosures via Fed Ex

cc: Azra Z. Mehdi, Esq.
Marvin A. Miller, Esq. (via facsimile)
Adam B. Deutsch, Esq. (via facsimile)

T:\Cases\SF\Household Int\Corres\counsel_100804.doc

Exhibit 8

From: "Kesch, Craig" <CKesch@Cahill.com>
To: "Sylvia Sum" <SylviaS@lerachlaw.com>, "Best, Landis C." <LBest@Cahill.com>
Date: 4/15/2005 6:26:07 PM
Subject: RE: Household International

Dear Sylvia:

The e-mail search term proposal has been addressed in Landis's letter to Monique dated today; which should have been recently received by your office.

We disagree with your statements with regard to "recent hard-copy productions" because, as we have informed you on numerous occasions, the Household Defendants' productions are in compliance with Fed. R. Civ. P. 34.

Sincerely,
Craig Kesch

-----Original Message-----

From: Sylvia Sum [mailto:SylviaS@lerachlaw.com]
Sent: Friday, April 15, 2005 3:12 PM
To: Kesch, Craig; Best, Landis C.
Cc: Azra Mehdi; Luke Brooks; Monique Winkler
Subject: Household International

Landis and Craig:

I write to follow up on our telephone conference of Tuesday, April 12. We disagreed with your latest revisions to the native format search term list and explained our objections to the limitations you imposed generally, and with respect to certain specific terms. However, we did offer a compromise for a pre-mediation search and production that would limit the search terms to those you agreed to in your latest letter dated April 5, 2005, as well as all names, reserving our rights to seek the inclusion of additional terms after the mediation. We would like to get a response to that proposal as soon as possible.

Also, with respect to recent hard-copy productions, those productions do not comply with Fed. R. Civ. P. 34 as they were not produced as kept in the usual course of business. As such, you had an obligation to organize and label the documents to correspond with the categories in the request. Therefore, we request that you provide a source log or identify the Bates ranges of the documents that correspond to specific requests.

Sylvia

Sylvia Sum
Lerach Coughlin Stoia Geller Rudman & Robbins LLP
(415) 288-4545
(415) 288-4534 (fax)

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

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Thank you.

CC: "Azra Mehdi" <Azram@lerachlaw.com>, "Luke Brooks" <LukeB@lerachlaw.com>, "Monique Winkler" <MoniqueW@lerachlaw.com>

Exhibit 9



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

Sylvia Sum
sylvias@lerachlaw.com

February 1, 2005

VIA FACSIMILE

Landis Best, Esq.
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 Landis:

During our December 7 and 9, 2004 meet and confers, you represented to plaintiffs that, aside from the electronic discovery, the Household Defendants intended to complete production by March 2005. Given the current pace at which documents are being produced, plaintiffs are concerned that production in this first round of discovery will not be completed by the end of the year, let alone by March 2005, even though the requests have been outstanding since May 17, 2004. Despite the Household Defendants' repeated assertion that over 2.4 million pages have already been produced, the fact is that the vast majority of these documents had already been previously produced in other proceedings. There is no good reason why these documents should not have been produced to plaintiffs months ago.

In the interest of establishing a schedule for the production of documents responsive to Plaintiffs' First Request for Production of Documents from the Household Defendants, I write to summarize the status of document production thus far.

1. No Production in Response to Request Nos. 4-5, 10, 13-14, 16-29

The Household Defendants agreed to produce responsive documents with respect to the following requests, but, to date, no documents have been produced: Request Nos. 4-5, 10, 13 (as limited to incentive programs or promotions for management ranks, sales ranks and collection ranks), 14 (as limited to summaries and policies regarding discipline), 16-18 (those parts agreed by the parties, see below), 19-24 (as limited to compensation of the Individual Defendants), and 25-29. With only a couple of months remaining to meet the March 2005 deadline, plaintiffs ask that the Household Defendants begin production of documents responsive to these requests immediately.





Landis Best, Esq.
February 1, 2005
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2. Partial Production of Documents or Where Status of Production Is Unknown

Request No. 1 (investigations by federal or state agencies into lending practices)¹: During the January 21, 2005 meet and confer, you represented that production relating to this request is complete. However, on January 28, 2005, plaintiffs received seven boxes "responsive to plaintiffs' requests concerning, *inter alia*, Household's lending policies and practices as well as investigations by state or federal agencies." Please advise if production relating to this request is complete or ongoing. If ongoing, plaintiffs request that you complete production by February 15, 2005. Since these documents were previously produced and the request has been outstanding for over eight months, there should be no further delay in producing these documents.

Request No. 2 (investigations by federal or state agencies into reaging): There is an unexplained gap between Bates HHS 02111554 and HHS 02115346. Please explain whether these documents are being withheld for privilege. If so, were they also withheld from the SEC? Also, please advise whether production relating to this request is complete. If incomplete, plaintiffs ask that you complete production by February 15, 2005 for the reasons outlined above.

Request No. 6 (sample loan documents): The Household Defendants have produced sample loan documents for each state. Plaintiffs are in the process of reviewing this production and will follow up with defendants regarding sufficiency upon completion of their review.

Request No. 7 (lending practices and policies): With respect to the recent production on January 28, 2005, the Household Defendants informed plaintiffs that the production was "responsive to plaintiffs' requests concerning, *inter alia*, Household's lending policies and practices as well as investigations by state or federal agencies." Please advise if this recent production was previously produced to a state or federal agency in connection with an investigation. Further, please advise if production relating to this request is complete.

Request No. 8 (organizational charts/employee directories): As discussed in numerous letters and telephone calls, including a January 7, 2005 letter detailing specific defects, production of organizational charts has been woefully inadequate, by failing to adequately demonstrate the corporate structure and interrelationship of the hundreds of Household subsidiaries. Household's two subsequent productions following the January 7 letter fail to correct these inadequacies and continue to be deficient.

The January 27, 2005 production consisting of 28 pages of organizational charts are incomplete sections of random business units lacking many years during the Class Period. In addition, the production included seven pages of organizational charts for Tax Masters and BTMI,

¹ The short-forms of the requests used in the headings are for convenience only. Plaintiffs do not intend to limit the requests by the use of abbreviations.



Landis Best, Esq.
February 1, 2005
Page 3

business units not listed on any of the previously produced organizational charts thereby making it impossible for plaintiffs to determine where or how these units fit within the Household structure.

Your one-page production of the September 2002 Mortgage Services organizational chart is insulting.

Finally, no employee directories have been produced to date. Plaintiffs will be moving to compel production of organizational charts and employee directories.

Request No. 9 (training materials): Per letter of December 15, 2004, plaintiffs requested that the approximately 50 videotapes and 25 audiotapes be copied and sent to us. Plaintiffs have not received these video and audiotapes. Please produce these tapes by February 15, 2005. Further, please advise plaintiffs if production relating to this request is otherwise complete.

Request Nos. 11 and 12 (structure/operational abilities of Vision and Vision system): As you are aware, it is plaintiffs' position that documents relating to any Vision enhancements resulting from the Consumer Protection Plan and/or any settlement with the Attorneys General or another federal or state agency are responsive to this request, as well as Requests 1-3 and 12, and must be produced. Please advise plaintiffs whether and, if so, when you intend to produce documents relating to Vision enhancements.

Request No. 15 (other lawsuits): In a December 15, 2004 letter, you stated that you have received legal pleadings and transcripts related to the *Luna* litigation on a rolling basis and would produce them shortly. See December 15, 2004 Greenblatt letter. We have not received any subsequent production relating to the *Luna* litigation. As discussed above, since the Household Defendants have had these documents for a significant period of time, please produce them promptly, along with any privilege logs produced in other litigations.

Request No. 30 (document destruction, retention and alteration policies): Please advise plaintiffs if production relating to this request is complete.

3. Requests Where Further Actions by Plaintiffs or Defendants Is Necessary

Request No. 3 (communications with federal or state agencies): The Household Defendants agreed to produce communications between Household and the Individual Defendants and the SEC or other state or federal agencies, as limited to the topics of reaging, predatory lending and the restatement. Upon a review of the non-public SEC request provided to plaintiffs on January 28, 2005, plaintiffs do not object to treating SEC requests as confidential. Notwithstanding the resolution of the SEC requests, plaintiffs expect production of communications with various Attorneys General and other state and federal agencies. To date, no documents have been produced. Please produce these documents.

Request No. 14 (management and employee discipline): In addition to agreeing to production of summaries and policies regarding discipline (which have not been produced yet), the



Landis Best, Esq.

February 1, 2005

Page 4

parties agreed to discuss searches of individual personnel files at a later date. However, due to the deficiencies in the production of organizational charts and employee directories, plaintiffs have been unable to limit the search of individual personnel files to specific persons. Thus, please produce promptly all summaries and policies. Plaintiffs will defer further action pursuant to this request until such production.

Request No. 17 (KPMG work performed for Household): The Household Defendants agreed to produce documents regarding work performed by KPMG related to predatory lending, reaging and the restatement and any work performed by KPMG on financials that were reported during the Class Period. To date, no documents have been produced. Please advise when you expect to produce these documents.

In addition, the Household Defendants informed plaintiffs that KPMG performed other services for numerous subsidiaries and that documents relating to such services will be voluminous. Plaintiffs informed the Household Defendants that due to the deficient production of organizational charts, plaintiffs did not have an understanding regarding Household's structure and interrelationships of its various subsidiaries. Thus, plaintiffs cannot limit this request, and ask for a complete production of responsive documents.

Request No. 18 (Andersen work performed for Household): The Household Defendants agreed to produce documents regarding: i) work performed by Andersen related to allegation of predatory lending, improper reaging and the restatement, ii) any work performed by Andersen on financials that were reported during the Class Period, and iii) consulting work performed by Andersen. To date, no documents have been produced. Please produce these documents promptly.

As with Request No. 17, plaintiffs cannot limit this request with respect to other services performed due to the deficient production of organizational charts.

Request No. 31 (preservation and retention of documents for this litigation): Defendants objected on the basis of privilege. Please provide a privilege log for documents withheld.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sylvia Sum", written over a horizontal line.

Sylvia Sum

SS:jc

cc: Marvin A. Miller, Esq.
Adam Deutsch, Esq.

Exhibit 10

Last revised October 19, 2004.

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SUPPLEMENTAL ORDER TO
ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE
IN CIVIL CASES BEFORE JUDGE WILLIAM ALSUP

INTRODUCTION

The purpose of this supplemental order is to guide the parties on recurring practical questions that arise prior to trial and to impose certain requirements for the conduct of the case. Counsel must please read this order and follow it.

SERVICE OF THIS ORDER

1. For cases originating in this Court, plaintiff(s) must serve this order and the order setting the initial case management conference (along with any other required pleadings) on each defendant. For cases removed from state court, the removing defendant(s) must serve this order and the order setting the initial case management conference (along with any other required pleadings) immediately on each and every party that has previously appeared or that appears within thirty days after removal. Thereafter, any existing party to the action that brings a new party into the action must immediately serve a copy of this order and the order setting the initial case management conference (along with any other required pleadings) on the new party.

CASE MANAGEMENT CONFERENCE

2. The parties will please address the following in their joint case management statement (not to exceed twelve pages) due at least *fourteen* calendar days before the case management conference:

(a) The basis for this Court's subject-matter jurisdiction and whether any issue exists regarding personal jurisdiction or venue;

(b) A brief description of the claims and defenses and a description of any related proceeding, including any administrative proceedings;

(c) A brief summary of the proceedings to date, including whether there has been full and timely compliance with the initial disclosure requirements of Federal Rule of Civil Procedure 26;

(d) A list of all pending motions and their current status;

(e) A brief description of major motions expected before trial;

(f) The extent to which new parties are expected to be added or existing parties deleted;

(g) The extent to which evidentiary, claim-construction or class-certification hearings are anticipated;

(h) The extent to which the parties have complied with the evidence-preservation requirements of paragraph 4 of this order;

(i) Any stipulated discovery limits different from the Federal Rules;

(j) Proposed deadlines and court dates, including a trial date;

(k) Whether a jury was properly demanded;

(l) What damages and other relief are sought;

(m) ADR efforts to date and a specific ADR plan for the case;

(n) Whether all parties will consent to assignment of the case to a magistrate judge and, if so, whether additional parties are likely to be joined;

(o) A service list for all counsel that includes telephone and fax numbers; and

(p) To the extent not addressed above, all other items set forth in
Local Rule 16-10.

3. Each party shall be represented at the case management conference by counsel
(preferably lead counsel) prepared to address all such matters and with authority to enter
stipulations and to make admissions.

4. Pursuant to FRCP 26(d), no formal discovery shall be initiated by any party until
after the meet-and-confer session required by FRCP 26(f), except by stipulation or prior court
order. As soon as a party has notice of this order, however, the party shall take such affirmative
steps as are necessary to preserve evidence related to the issues presented by the action,
including, without limitation, interdiction of any document-destruction programs and any
ongoing erasures of e-mails, voice mails, and other electronically-recorded material.

ELECTRONIC CASE FILING — LODGING HARD COPIES WITH CHAMBERS

5. In all "E-Filing" cases, in addition to filing papers electronically, the parties are
required to lodge for chambers one paper copy of each document that is filed electronically.
These printed copies shall be marked "Chambers Copy — Do Not File" and shall be in an
envelop clearly marked with the judge's name and case number. It shall be delivered to the
Clerk's office no later than noon on the day following the day that the papers were filed
electronically. Parties shall *not file* a paper copy of any document with the Clerk's Office that
has already been filed electronically. For the final pretrial conference, please follow *Guidelines
for Trial and Final Pretrial Conference In Civil Jury Cases Before the Honorable William
Alsup*.

6. Any proposed order other than those routinely submitted in connection with
regularly-noticed motions shall be sent by e-mail to "whapo@cand.uscourts.gov" in
WordPerfect or Microsoft Word format (*never* PDF). PLEASE include the case name and
number on the "subject" line of the e-mail message. This address should *only* be used for such
proposed orders and submissions for discovery conferences.

SETTING MOTIONS

7. Counsel need not request a motion hearing date and may notice non-discovery motions for any Thursday (excepting holidays) at 8:00 a.m. Case management and final pretrial conferences will be set by the Court.

FORM OF SUBMISSIONS

8. On summary judgment motions, joint statements of undisputed facts are not required but are helpful if completely agreed upon. Please do *not* file separate statements of "undisputed facts."

9. Reply declarations are disfavored. Opening declarations should set forth all facts on points foreseeably relevant to the relief sought. Reply papers should not raise new points that could have been addressed in the opening.

10. The title of the submission must be sufficient to alert the Court to the relief sought; for example, please do not bury a request for continuance in the body of a memorandum.

11. All submissions filed with the Court shall include on the cover sheet the date and time of the hearing or conference. Counsel should include their facsimile transmission numbers along with their telephone numbers on their papers.

DISCOVERY

12. The following paragraphs on discovery provide counsel and the parties with views and guidelines of Judge Alsup so that they can plan accordingly. For good cause, the parties are invited to propose any modifications in their joint case management conference statement. Unless and until modified, however, the following provisions shall supplement the requirements of the Federal Rules of Civil Procedure and the local rules.

13. In responding to requests for documents and materials under FRCP 34, all parties shall *affirmatively state* in a written response the full extent to which they will produce materials and shall, promptly after the production, confirm in writing that they have produced *all* such materials so described that are locatable after a diligent search of *all* locations at which such materials might plausibly exist. It is not sufficient to state that "responsive" materials will be or

1 have been produced. Such a response leaves open the distinct possibility that other responsive
2 materials have not been produced.

3 14. In searching for responsive materials in connection with FRCP 34 requests or for
4 materials required to be disclosed under FRCP 26(a)(1), parties must search computerized files,
5 e-mails, voice mails, work files, desk files, calendars and diaries, and any other locations and
6 sources if materials of the type to be produced might plausibly be expected to be found there.
7 The Court has found that certain basic information normally learned by counsel anyway should
8 be made available to the other side at the time of production, as if it were a response to a
9 standing interrogatory, as follows. At the time of the production, the responding party should
10 provide a written list to the requesting party setting forth in detail each specific source and
11 location searched. The list must also identify, by name and position, all persons conducting the
12 search and their areas of search responsibility. The producing party shall also provide a list
13 describing the specific source for each produced item as well as for each item withheld on a
14 ground of privilege, using the unique identifying numbers to specify documents or ranges.
15 Materials produced in discovery should bear unique identifying control numbers on each page.

16 15. To the maximum extent feasible, all party files and records should be retained
17 and produced in their original form and sequence including file folders, and the originals should
18 remain available for inspection by any counsel on reasonable notice.

19 16. Except for good cause, no item shall be received as case-in-chief evidence if the
20 proponent has failed to produce it in response to a reasonable and proper discovery request
21 covering the item, regardless of whether any discovery motion was made. A burden or
22 overbreadth or similar objection shall not be a valid reason for withholding requested materials
23 actually known to counsel or a party representative responsible for the conduct of the litigation.

24 17. Privilege logs shall be promptly provided and must be sufficiently detailed and
25 informative to justify the privilege. *See* FRCP 26(b)(5). No generalized claims of privilege or
26 work-product protection shall be permitted. With respect to each communication for which a
27
28

1 claim of privilege or work product is made, the asserting party must at the time of assertion
2 identify:

3 (a) all persons making or receiving the privileged or protected
4 communication;

5 (b) the steps taken to ensure the confidentiality of the communication,
6 including affirmation that no unauthorized persons have received the
7 communication;

8 (c) the date of the communication; and

9 (d) the subject matter of the communication.

10 Failure to furnish this information at the time of the assertion will be deemed a waiver of the
11 privilege or protection. The log should also indicate, as stated above, the location where the
12 document was found.

13 18. Absent extraordinary circumstances, counsel shall consult in advance with
14 opposing counsel and unrepresented proposed deponents to schedule depositions at
15 mutually-convenient times and places. That some counsel may be unavailable shall not,
16 however, be grounds for deferring or postponing a deposition if another attorney from the same
17 firm or who represents a party with similar interests to that witness is able to attend. Ordinarily,
18 if one side desires a prompt deposition, the other side is expected to agree to dates falling within
19 *thirty days* of the request. On the other hand, rarely should one side expect the other side to
20 agree to a deposition sooner than *seven days* of the request.

21 19. If any objection to a request for materials is overruled, and if the disputed request
22 was due and pending at the time of a deposition, the withholding party or counsel must, at the
23 request of any other party, re-produce all deponents under its control or represented by them for
24 further deposition examination as to any new materials produced in response that are germane
25 to that deponent and must bear the expense of doing so. A party objecting to producing
26 requested materials may not use the existence of its own objections as a basis for postponing
27 any deposition unless such party promptly meets and confers and then, if failing to reach an
28 agreement, seeks to bring a prompt motion for a protective order.

20. Counsel and parties shall comply with FRCP 30(d)(1). Deposition objections must be as to privilege or form only. Speaking objections are prohibited. Under no circumstances should any counsel interject, "if you know," or otherwise coach a deponent. When a privilege is claimed, the witness should nevertheless answer questions relevant to the existence, extent or waiver of the privilege, such as the date of a communication, who made the statement, to whom and in whose presence the statement was made, other persons to whom the contents of the statement have been disclosed, and the general subject matter of the statement. Private conferences between deponents and attorneys in the course of examination, including a line of related questions, are improper and prohibited except for the sole purpose of determining whether a privilege should be asserted.

21. Deponents and their counsel must make a good-faith effort to prepare for depositions and to refresh witness memories on important matters in the suit about which the witness reasonably should be expected to have knowledge. Deponents who claim to lack recollection during their deposition but who later claim at trial to have had their memories refreshed in the interim, may be, among other things, impeached with their previous failures of recollection during their depositions or be subject to preclusion. In preparing deponents, defending counsel shall segregate and retain all materials used to refresh their memories and shall provide them to examining counsel at the outset of the deposition.

22. To the maximum extent feasible, deposition exhibits shall be numbered in a simple manner that will allow the same numbering at trial. In discovery, counsel shall agree on blocks of exhibit numbers to be used by the respective parties. Identical exhibits should not be re-marked, but various versions of the same document, such as copies with hand notes added, should be separately marked if used. *See* Local Rule 30-2(b)(3).

23. FRCP 26(a)(2)(B) requires disclosure of all opinions, bases, reasons and "other information considered" by an expert. Counsel shall preserve all drafts of expert reports (partial or complete) and notes and other evidence of communications with experts (or with any intermediaries between counsel and the experts) on the subject of this actual or potential testimony, and shall instruct their experts and any intermediaries to do likewise. All such

1 materials shall be produced upon expert designation (unless all parties otherwise stipulate in
2 writing). This requirement does not apply to intermediate drafts prepared solely by the
3 testifying expert not provided to or discussed with anyone else. Counsel's private notes of
4 conversations will be treated as work product and need not be produced absent the showing
5 required by FRCP 26(b)(3).

6 24. With respect to depositions under FRCP 30(b)(6), the fundamental purpose is to
7 allow a party to notice a deposition by subject matter, thereby requiring the respondent to
8 designate and to produce one or more organization witnesses knowledgeable on the designated
9 topic, a useful procedure when the roles of percipient witnesses controlled by an adverse party
10 are unknown. In some cases, however, counsel routinely appear to notice
11 Rule 30(b)(6) depositions on numerous and wide-ranging topics, including even the basis for
12 "contentions" made by adverse parties. To obviate disputes and to give guidance, these
13 guidelines will be observed:

14 (a) Without a prior order increasing the limit, a party may seek
15 Rule 30(b)(6) depositions from another party on up to a total of ten subject
16 matters (for the entire case) described with "reasonable particularity." In framing
17 the subjects, it is normally improper to ask for Rule 30(b)(6) deponents to testify
18 concerning the entire basis of a claim or defense. On the other hand, examples of
19 proper subjects, which would require the respondent to find and to produce
20 knowledgeable deponents, include "the time line of research and development
21 leading to the invention in question" or "the efforts undertaken by defendant to
22 locate documents responsive to plaintiff's document request." The notice should
23 be directed at discovering percipient facts in the possession of the adverse party,
24 not at forcing a supposed "fact witness" to appear and defend the entire thesis of a
25 claim or defense. If a notice includes an overbroad topic, the overbroad topic
26 shall be unenforceable and may not be later replaced with a proper topic.

27 (b) Each witness-designee deposed for one half-day or more in a
28 Rule 30(b)(6) deposition shall count as a single deposition for purposes of the

1 deposition limit under FRCP 26 or under any case management order setting a
2 limit on the number of depositions. A corporate designee may, immediately after
3 being deposed on the stated subject, be deposed in his or her individual capacity.
4 Both such sessions shall count together as a single deposition (although they
5 should be separately transcribed). If two designees, to take another example, are
6 interrogated, each for one half-day or more, then they count as two depositions.

7 (c) If an organization cannot reasonably locate a witness to testify
8 based on personal knowledge, there is no requirement under Rule 30(b)(6) for the
9 organization to "woodshed" or to "educate" an individual to testify on the subject.
10 If the organization does not produce any such deponent, however, the
11 organization may not present case-in-chief evidence at trial or on summary
12 judgment on that topic from any witness it could have so designated.

13 (d) Rule 30(b)(6) testimony never constitutes an irrebuttable judicial
14 admission. It will normally, however, be evidence admissible against the
15 organization producing the witness. The jury may, upon request, be instructed on
16 the significance of the testimony under Rule 30(b)(6).

17 25. If a dispute arises during a deposition and involves either a persistent obstruction
18 of the deposition or a refusal to answer a material question on a ground other than privilege,
19 counsel may attempt to arrange a telephone conference with the Court through the courtroom
20 deputy, Dawn Toland, at 415-522-2020. Any such conference should be attended by the same
21 court reporter recording the deposition.

22 26. All other requests for discovery relief must first be summarized in a letter no
23 longer than three pages from the party seeking relief. Up to twelve pages of attachments may be
24 added. Anything more clogs up the system. Counsel should identify themselves in the signature
25 block as "counsel for _____" and should e-mail their discovery-dispute requests and
26 responses to "whapo@cand.uscourts.gov," providing the case name and number in the e-mail's
27 subject line. Alternatively, counsel may send their letters via the United States mail. The Court
28 will then advise the parties concerning whether a response, written motion or a telephone

1 conference will be required. After the telephone conference, counsel should submit their
2 proposed order (agreed as to form) via the same e-mail address or by United States mail. This
3 paragraph applies only to cases wherein discovery is being supervised by the district judge rather
4 than by a magistrate judge or special master. Counsel are still responsible for filing or e-filing
5 any and all discovery letters.

6 DISCLOSURES

7 27. Apart from discovery, Rule 26 requires certain automatic disclosures and requires
8 them to be made in a timely manner. Under Rule 37(c), untimely-disclosed materials may not be
9 used at trial or on summary judgment unless the delay in disclosure is "harmless" or unless
10 "substantial justification" for the delay is shown.

11 COMMUNICATIONS WITH CHAMBERS

12 28. Please do not send any letters to the Court (except for requests for discovery
13 conferences, short cover letters for dismissals, orders agreed-upon as to form, or chambers
14 copies of electronically-filed documents). When corresponding with the Court by letter, always
15 identify whom you represent. Please do not fax or messenger anything to chambers without
16 advance permission specific to the item. If you need to messenger a letter to the Court, please
17 have it taken directly to the Clerk's Office. If you want the official file to be complete, you must
18 either take your letter to the Clerk's Office on the 16th floor and request it to be filed in the
19 official files, or mail it to the Clerk's Office for filing, or e-file it if the case is an e-filed case; the
20 chambers staff is *not* responsible for filing your documents.

21 29. You may contact the courtroom deputy, Dawn Toland (on the 16th floor in the
22 Clerk's Office), at 415-522-2020 with appropriate inquiries. Except for the letters described
23 above, please do not attempt to make contact by telephone or any other *ex parte* means with
24 chambers staff.

25 CROSS REFERENCE TO OTHER STANDING ORDERS AND GUIDELINES

26 30. The Court has separate standing guidelines for preparation for the final pretrial
27 conference and trial. In securities cases, the Court has a standing order concerning early notice
28

1 to class members. They are always available for review at the website for the United States
2 District Court for the Northern District of California at www.cand.uscourts.gov.

3
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5 Dated: October 19, 2004.

S/ WILLIAM ALSUP
WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

United States District Court
For the Northern District of California

Exhibit 11

#246

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re ORACLE CORPORATION SECURITIES LITIGATION)	Master File No. C-01-0988-MJJ
)	<u>CLASS ACTION</u>
This Document Relates To:)	AMENDED PROPOSED ORDER
ALL ACTIONS.)	SETTING A DISCOVERY PLAN
)	Judge Martin J. Jenkins
)	Magistrate Judge Joseph C. Spero

1 On Tuesday, March 1, 2005, the parties appeared before United States Magistrate Judge
 2 Joseph C. Spero for a discovery conference. The parties offered written discovery plans and
 3 presented oral argument. The Court, having reviewed the written submissions and considered the
 4 parties' oral argument, hereby sets forth the following Discovery Plan, which shall govern discovery
 5 in this case.

6 For the reasons stated on the record, IT IS ORDERED THAT:

7 **I. SCOPE OF DISCOVERY**

8 The scope of discovery shall be as follows:

9 **A. RELEVANT TIME PERIOD**

10 For purposes of responding to written discovery requests, the "Relevant Time Period" shall
 11 be from June 1, 2000 to June 1, 2001. Documents created outside of the Relevant Time Period that
 12 refer to events within the Relevant Time Period must also be produced.

13 **B. FILES TO BE SEARCHED**

14 In responding to Plaintiffs' requests for documents, Oracle Corporation ("Oracle" or the
 15 "Company") shall search the hard copy and electronic files of the following individuals:

16 1. Lawrence Ellison ("Ellison"), Jeffrey Henley ("Henley"), Edward "Sandy"
 17 Sanderson, Stephanie Aas, Jennifer Glass and Jennifer Minton (collectively "the Speakers");

18 2. The Speakers' direct reports during the Relevant Time Period including, but not
 19 limited to, those represented in Oracle's February 18, 2005 letter to the Court;

20 3. The Area Vice Presidents in Oracle's three United States sales and consulting
 divisions: North American Sales, Oracle Service Industries and Oracle Products Industries;

21 4. The following individuals: John Nugent, Bret Fuller, Charles Rozwat, Gary Roberts,
 22 John Wheeler, Sergio Giacoletto, Greg Myers, Neil Menon, Brad Scott, Michael Quinn, Michael
 Rocha, Ray Lane and Ron Cuneo; and

23 5. Other individuals, as agreed upon by the parties or ordered by the Court.

24 **C. DEFINITION OF KEY ISSUES IN CASE**

25 With respect to the following topics related to discovery between the parties, the Court sets
 26 forth the following guidelines:

1 1. **Economy**

2 Subject to the limitations set forth in Sections I(A) and (B) above, hereafter ("SCOPE"),
3 Defendants shall produce documents and communications (including e-mail correspondence)
4 concerning the United States economy and its impact or potential impact on Oracle's revenues,
5 earnings and expenses; its impact or potential impact on customer purchasing decisions of IT
6 products and services in general; and specifically the purchase of products or services from Oracle.

7 2. **Functionality of Oracle's Suite 11i Software and Its Individual**
8 **Modules**

9 Defendants shall produce:

- 10 (a) Software versions 1, 2 and 3 of Oracle's Suite 11i;
11 (b) High level design documents for Suite 11i;
12 (c) Technical manuals for Suite 11i;
13 (d) "Bug reports" that in any way reference integration or interoperability;
14 (e) High level documents describing the scope and dimension of "bug
15 problems" within Suite 11i and/or any of its modules other than integration and interoperability;
16 (f) Documents regarding any lost or deferred sales of any Oracle product, as
17 well as any material expense with respect to any Oracle product – such as refunds, rebates or
18 remediation. For purposes of this issue only, "material expense" is defined as having a financial
19 impact greater than or equal to \$500,000.

20 3. **Revenue/Earnings Forecasting**

21 Subject to the Court's rulings on SCOPE, Defendants shall produce documents relating to
22 Oracle's forecasts, including any mention of the economy as it relates to Oracle's forecasting during
23 the Relevant Time Period and as it related to the Company's pipeline and its growth or decline.
24 Additionally, Defendants shall produce documents relating to Oracle's sales pipeline and pipeline
25 conversion rates/ratios.

26 4. **Accounting and Underlying Documents**

27 Defendants shall produce all documents relating to (i) the alleged "On Account Cleanup"
28 occurring in November 2000; (ii) the 46,000 debit memoranda; and (iii) the accounting treatment of
those debit memoranda, including any audit trail, and all related accounting policies.

1 **5. Insider Trading**

2 Subject to the Court's rulings on SCOPE, Defendants shall produce documents and
3 communications regarding Defendants' sales or contemplated sales of Oracle securities during
4 January 2001. These documents shall include Defendants' option agreements, the reasons and
5 timing of their sales, and the Company's policies and procedures regarding trading and options.

6 **6. Special Litigation Committee**

7 Defendants shall produce all underlying documents that the Special Litigation Committee
8 ("SLC") reviewed from whatever source, except documents subject to privilege or work product
9 protection for which they will produce a privilege log. Defendants are not required to specifically
10 identify these documents as having been produced to the SLC. Defendants reserve their right to
11 designate any such documents as either "Confidential" or "Highly Confidential" under the terms of
12 the January 11, 2005 Revised Stipulated Protective Order Governing Confidentiality. Such
13 production shall not constitute a waiver of either the attorney-client or attorney work product
14 privilege.

15 Plaintiffs may file a motion to compel production of documents related to the SLC's
16 investigation including production of the SLC Report itself.

17 **II. CONVENTIONS FOR PARTY DISCOVERY**

18 **A. TIMING OF DOCUMENT PRODUCTION**

19 Defendants shall produce documents on a rolling basis with production to be completed by
20 May 1, 2005. Defendants shall produce documents responsive to Plaintiffs' requests for documents
21 contained in the files of any deponent not otherwise within the category of individuals specified in
22 Section I(B) above, no later than seven days prior to the date on which such witness is noticed to be
23 deposed. Plaintiffs shall complete their document production by March 21, 2005, with the exception
24 of the interrogatory set forth in VII(C) *infra*, which shall be responded to within forty-five (45) days
25 of the entry of this Order.

26 **B. PRODUCTION FORMAT**

27 When preparing documents for production, the parties shall adhere to the following
28 conventions with respect to documents within their possession, custody or control:

AMENDED ~~PROPOSED~~ ORDER SETTING A DISCOVERY PLAN - C-01-0988-
MJJ (Consolidated)

(a) The parties shall produce e-mails in searchable TIFF format. E-mails shall include the following information: sender, recipient, blind and carbon copies, date sent, e-mail box from whom the document is produced, and the date and time it was opened, deleted, responded to or forwarded. Furthermore, the parties shall produce all attachments to or documents embedded in such e-mails in native format, readily accessible from each e-mail.

(b) The parties shall produce all documents that were created and kept in electronic format in either native format or a searchable electronic format. For example, Microsoft Word or Excel files shall be produced in their native format. Information stored on Oracle databases, such as the accounting treatment for the 46,000 debit memos, shall be downloaded into Excel or another comparable format and produced in that electronic format.

(c) The parties shall meet and confer regarding locking and protecting electronic documents in order to prevent their alteration or manipulation subsequent to production.

(d) With respect to documents that were reviewed by the SLC or produced to the plaintiffs in Oracle Cases, JCCP No. 4180 (CIV 417511 San Mateo Co. Sup. Ct.) and in *In re Oracle Corp. Deriv. Litig.*, C.A. No. 18751 (Del. Ct. of Chancery) that have already been produced to Plaintiffs in paper format, Defendants shall also produce to Plaintiffs spreadsheets in native format and e-mails in searchable TIFF format with the metadata described above. Defendants may submit a letter brief to the Court requesting that Plaintiffs share the cost of reproducing these specified documents in electronic format.

C. PRODUCTION SOURCE LOG

The parties must produce logs indicating the source files of all produced documents, including for documents previously produced.

D. PRIVILEGE LOGS

The parties shall produce privilege logs within forty-five (45) days after a document is withheld for privilege.

III. DEPOSITIONS

A. TIME LIMIT PER DEPOSITION

Federal Rule of Civil Procedure 30 shall govern the time limit for depositions, except upon agreement of the parties or court order.

B. DEPOSITIONS OF 30(b)(6) WITNESSES

(a) ~~Plaintiffs' Position~~

Plaintiffs' depositions of the persons most knowledgeable at Oracle shall be completed by April 15, 2005. The depositions may cover the following agreed upon topics: accounting, electronic systems, forecasting and Suite 111.

1 Defendants shall produce a documentary and written response to Plaintiffs' 30(b)(6) subjects
 2 relating to document preservation. If, after Plaintiffs have had an opportunity to review those
 3 responses, Plaintiffs believe that a deposition regarding document preservation is still necessary, the
 4 parties shall meet and confer.

5 Where Defendants offer a Speaker as defined in I(B)(1), a Speaker's direct report as defined
 6 in I(B)(2), or an individual named in the Revised Second Amended Complaint for Violations of the
 7 Federal Securities Laws ("RSAC") as a 30(b)(6) witness, Plaintiffs shall not be precluded from
 8 deposing that same witness in his/her individual capacity at a later date. Instead, in such
 9 circumstances, the parties shall meet and confer, taking into account the outstanding discovery and
 10 may seek assistance from the Court in the event they are unable to reach an agreement.

11 ~~(b) Defendants' Position~~

12 Plaintiffs' depositions of the persons most knowledgeable at Oracle shall be completed by
 13 April 15, 2005. The depositions may cover the following agreed upon topics: accounting,
 14 electronic systems, forecasting and Suite 11i.

15 Defendants shall produce a documentary and written response to Plaintiffs' 30(b)(6)
 16 subjects relating to document preservation. If, after Plaintiffs have had an opportunity to review
 17 those responses, Plaintiffs believe that a deposition regarding document preservation is still
 18 necessary, the parties shall meet and confer.

19 Where an individual is offered by Oracle as a Rule 30(b)(6) witness at a deposition and
 20 documents from that individual's files have been produced to Plaintiffs at least seven (7) days prior
 21 to the deposition, that individual may not be deposed again in his or her individual capacity at a
 22 later date.

23 **C. FACT WITNESS DEPOSITIONS**

24 Depositions of substantive witnesses shall begin after May 1, 2005. Subject to the other
 25 limits above, Defendants shall produce documents from the files of a deponent, including a
 26 confidential witness ("CW"), no less than seven (7) days before that individual's deposition as a fact
 27 witness.

1 (a) Subject to change upon the receipt and review of discovery from Defendants
2 and non-parties, Plaintiffs currently intend to depose the following witnesses:

- 3 1. Anil Vora
- 4 2. Bill Castello
- 5 3. Brad Scott
- 6 4. Bret Fuller
- 7 5. Charles Rozwat
- 8 6. David Winton
- 9 7. Edward J. Sanderson
- 10 8. Frank Varasano
- 11 9. Gary Bloom
- 12 10. Gary Roberts
- 13 11. George Roberts
- 14 12. Ivgen Guner
- 15 13. Jay Nussbaum
- 16 14. Jeffrey Henley
- 17 15. Jennifer Minton
- 18 16. Jim English
- 19 17. Jody Terry
- 20 18. John Nugent
- 21 19. Jon Simmons
- 22 20. Larry Garnick
- 23 21. Lawrence Ellison
- 24 22. Mark Barrenceha
- 25 23. Mary Ann Gillespie
- 26 24. Michael Rocha
- 27 25. Michael P. DeCesare
- 28 26. Nick Classik
- 29 27. Patricia McManus
- 30 28. Ray Lane
- 31 29. Richard Blotner
- 32 30. Ron Police
- 33 31. Safra Catz
- 34 32. Sarah Kopp
- 35 33. Sergio Giaccolletto
- 36 34. Steve McLaughlin
- 37 35. Terrence Ford
- 38 36. Tom Thimot
- 39 37. Tom Williams
- 40 38. Valerie A. Borthwick

41 Plaintiffs reserve the right to modify this list and to take additional depositions as discovery
42 in this action proceeds.

1 (b) Defendants currently intend to depose the forty-nine (49) CWs as well as the
2 proposed class representatives. Defendants reserve the right to take additional depositions, up to the
3 sixty-five (65) allowed by the Court, at any time prior to the close of fact discovery.

4 **IV. EXPERT DISCOVERY**

5 The parties shall exchange any affirmative expert reports on March 3, 2006, and any rebuttal
6 reports on April 3, 2006. The parties shall complete expert discovery by May 22, 2006.

7 **V. THIRD PARTY DISCOVERY**

8 **A. LIFTING OF THE STAY AND TIMING OF PRODUCTION FOR
9 ALL THIRD PARTY DISCOVERY**

10 The Court hereby lifts the stay on third party discovery put in place by its February 5, 2005
11 Order, subject to the limitations imposed by this Order. Plaintiffs shall meet and confer with third
12 parties concerning the timing of their document production.

13 **B. RELEVANT TIME PERIOD**

14 The definition of Relevant Time Period, June 1, 2000 – June 1, 2001, set forth above, shall
15 apply to all third party discovery.

16 **C. SCOPE OF DISCOVERY FROM THIRD PARTY CUSTOMERS**

17 **1. Number of Customers to be Subpoenaed**

18 Without leave of Court, Plaintiffs shall not subpoena more than one hundred (100) of
19 Oracle's current and former customers. Plaintiffs have, to date, subpoenaed ninety-three (93) of
20 Oracle's customers.

21 **2. Subject Matter of Discovery to Be Produced by Customers**

22 Plaintiffs may seek discovery from Oracle's current and former customers on the following
23 topics only:

24 **(a) The United States Economy**

25 Plaintiffs' third party discovery from customers relating to the economy is hereby limited to
26 the following:

27 (i) communications with Oracle relating to increases or decreases in purchases from Oracle
28 as a result of the economy; and

1 (ii) internal documents relating to decisions to purchase or not to purchase from Oracle
2 because of the economy.

3 (b) Oracle Software Integration and Interoperability
4 Problems

5 Plaintiffs' third party discovery from customers relating to problems with Oracle's Suite 11i
6 is hereby limited to documents regarding integration and interoperability (including integration and
7 interoperability gaps and bugs) with Oracle applications Suite 11i and its modules, including but not
8 limited to Oracle's CRM Module. For purposes of this Order, integration refers to the ability of
9 modules of Suite 11i to work together and share information.

10 (c) Accounting

11 Plaintiffs' third party discovery from customers relating to Oracle's accounting is limited to
12 documents relating to the 46,000 debit memo transactions created on or about November 17, 2000.

13 **D. DISCOVERY FROM ANALYSTS AND MEDIA ORGANIZATIONS
14 COVERING THE COMPANY**

15 Subject to the Court's rulings on SCOPE, Plaintiffs may seek discovery from analysts and
16 news services on the following topics:

- 17 (a) The Defendants' public statements;
- 18 (b) Customer interviews and complaints/problems with Oracle products,
19 including 11i;
- 20 (c) The downturn in the economy and IT budgets during the Class Period;
- 21 (d) Oracle's forecasts and projections;
- 22 (e) Oracle's revenue and earnings reports and financial statements;
- 23 (f) Integration and/or interoperability gaps and bugs; and
- 24 (g) One-on-one interviews with Defendants.

25 **E. DISCOVERY FROM AUDITORS**

26 Plaintiffs' third party discovery from Oracle's auditors and accountants is limited to
27 documents relating to (i) the debit memo transactions; (ii) the accounting treatment of the 46,000
28 debit memo transactions; and (iii) tax advisory services provided to Henley and Ellison relating to
the Relevant Time Period.

1 In addition, Oracle's auditors and accountants ARE HEREBY ORDERED to preserve all
2 relevant documents (including electronic documents and e-mail) concerning their audit work on
3 behalf of Oracle for the Relevant Time Period.

4 **F. DISCOVERY FROM CONFIDENTIAL WITNESSES**

5 Plaintiffs shall disclose the names and corresponding CW numbers of the CWs used in the
6 RSAC to Defendants' counsel, including in-house counsel at Oracle, within forty-eight (48) hours of
7 the signing of this Order. Plaintiffs' disclosures shall be subject to the following restrictions:

8 (a) Counsel for Defendants shall not disclose a CW's role to anyone other than

9 (i) Defendants' counsel within Mayer, Brown, Rowe & Maw LLP ("MBR&M"); (ii) in-house
10 counsel of Oracle Corporation; and (iii) any consultant retained by MBR&M for purposes of this
11 litigation upon receipt of an Undertaking in the form of Exhibit A hereto;

12 (b) Defendants' counsel may discuss with current or former Oracle employees or
13 third parties the persons who are CWs, including the information attributed to them in this litigation
14 and any other information that may bear upon the case, but shall not disclose in any such
15 communications that the persons are CWs referenced in this litigation;

16 (c) Defendants' counsel or defendants' experts/consultants shall not make initial
17 contact with a CW without informing Plaintiffs' counsel of their intention to do so no less than
18 forty-eight (48) hours prior to making such initial contact;

19 (d) The identities of the CWs shall not be used for any purpose other than this
20 litigation; and

21 (e) When a party seeks to file with the Court a document disclosing the identities
22 of the CWs in their roles as CWs, the procedures specified in paragraph 10 of the January 11, 2005
23 Revised Stipulated Protective Order Governing Confidentiality shall apply. Similarly, portions of
24 depositions or transcripts that refer to any CW's role will be kept confidential consistent with this
25 Order.

26 (f) The Court retains jurisdiction over the enforcement of this Order for six (6)
27 months after entry of final judgment in this action.

1 **VI. CLASS DISCOVERY**

2 **A. CLASS REPRESENTATIVES**

3 Plaintiffs shall produce documents regarding class representative discovery by March 7,
4 2005.

5 Defendants' brief in opposition to the motion for class certification shall be due by May 6,
6 2005, and Plaintiffs' reply shall be due by June 13, 2005. The date for oral argument shall be set by
7 the United States District Court Judge Martin J. Jenkins. The parties have requested a hearing date
8 in July 2005 or at the Court's earliest convenience thereafter.

9 **B. DISCOVERY FROM ABSENT CLASS MEMBERS**

10 Prior to the discovery conference, the Court was informed that Defendants are not currently
11 seeking any discovery from absent class members, but are reserving their right to do so in the future.

12 **VII. MISCELLANEOUS ADDITIONAL DISCOVERY ISSUES**

13 (a) All contention interrogatories are stayed until further order of the Court. No
14 response or further response to any outstanding contention interrogatory is required at this time.

15 (b) Plaintiffs shall produce all documents received from CWs relating to the
16 Defendants and shall identify from which CW the documents were received. The latter information
17 shall be subject to V(F) above.

18 (c) With respect to Defendants' interrogatories to Plaintiffs seeking information
19 concerning the individuals and organizations identified in Plaintiffs' Rule 26(a) Initial Disclosures,
20 Plaintiffs are ordered to respond by describing generally what Plaintiffs understand each of the
21 identified witnesses in their Initial Disclosures know about the case. Plaintiffs shall respond to this
22 modified interrogatory within forty-five (45) days of the entry of this Order.

23 **VIII. RECONCILIATION OF DISCOVERY DISPUTES**

24 As outlined in Judge Jenkins' Amended Pretrial Order of December 17, 2004, the parties
25 shall meet and confer about all discovery disputes and, in the event that they cannot resolve such
26 disputes, each party shall submit a two-page letter brief to the Court outlining the party's position on
27 the issue. All matters relating to the modification of the discovery plan shall be addressed to the
28

undersigned. The parties shall address all future letter briefs to both Judge Jenkins and Magistrate

Judge Spero. *per*

IT IS SO ORDERED.

DATED: *3/10/05*


THE HONORABLE JOSEPH C. SPERO
UNITED STATES MAGISTRATE JUDGE

APPROVED AS TO FORM.

Submitted by:

DATED: March 9, 2005

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
MARK SOLOMON
DOUGLAS R. BRITTON

/s/
MARK SOLOMON

401 B Street, Suite 1600
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SHAWN A. WILLIAMS
WILLOW E. RADCLIFFE
ELI R. GREENSTEIN
JENNIE LEE ANDERSON
MONIQUE C. WINKLER
100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

Lead Counsel for Plaintiffs

AMENDED [PROPOSED] ORDER SETTING A DISCOVERY PLAN - C-01-0988-
MJJ (Consolidated)

1
2 MAYER, BROWN, ROWE & MAW LLP
3 ALAN N. SALPETER
4

5 /S/
6 ALAN N. SALPETER

7 190 South LaSalle Street, Suite 3900
8 Telephone: 312/782-0600
9 312/701-7711 (fax)

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AMENDED ~~(PROPOSED)~~ ORDER SETTING A DISCOVERY PLAN - C-01-0988-
MJJ (Consolidated)

EXHIBIT A

AGREEMENT TO BE BOUND BY PROTECTIVE ORDER

I, _____, hereby acknowledge that I have read the
[Proposed] Order re Discovery Plan that was issued by the United States District Court for the
Northern District of California on March __, 2005, in the case of: *In re Oracle Corporation
Securities Litigation*, Lead Case No. 417511, Case No. C-01-0988-MJJ.

I recognize that I am bound by the terms of that Order and I agree to comply with those
terms. I fully understand that any disclosure of the identities of the confidential witnesses to
anyone other than those individuals expressly permitted by the Order could expose me to
sanctions and punishment in the nature of contempt. I hereby agree to abide by the obligation
and conditions of the Order.

DATED: _____

DECLARATION OF SERVICE BY FACSIMILE

I, the undersigned, declare:

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

2. That on March 9, 2005, declarant served by facsimile the **AMENDED [PROPOSED] ORDER SETTING A DISCOVERY PLAN** to the parties listed on the attached Service List.

3. That there is a regular communication by facsimile between the place of origin and the places so addressed:

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of March, 2005, at San Francisco, California.

/s/ Carolyn Burr
CAROLYN BURR

ORACLE III (LEAD)

Service List - 3/9/2005 (201-064-1)

Page 1 of 1

Counsel For Defendant(s)

Donald M. Falk
Lee H. Rubin
Shirish Gupta
Mayer, Brown, Rowe & Maw LLP
Two Palo Alto Square, Suite 300
Palo Alto, CA 94306
650/331-2000
650/331-2060(Fax)

Alan N. Salpeter
Javier H. Rubinstein
Mayer, Brown, Rowe & Maw LLP
190 South LaSalle Street, Suite 3900
Chicago, IL 60603-3441
312/782-0600
312/701-7711(Fax)

Dorian Daley
James C. Maroulis
Oracle Corporation
500 Oracle Parkway, Mail Stop 50P7
Redwood City, CA 94065
650/506-5200
650/506-7114(Fax)

Counsel For Plaintiff(s)

William S. Lerach
Mark Solomon
Douglas R. Britton
Lerach Coughlin Stoia Geller Rudman &
Robbins LLP
401 B Street, Suite 1600
San Diego, CA 92101-4297
619/231-1058
619/231-7423(Fax)

Sanford Svetcov
Shawn A. Williams
Willow E. Radcliffe
Lerach Coughlin Stoia Geller Rudman &
Robbins LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111-5238
415/288-4545
415/288-4534(Fax)

Exhibit 12



Wilson Sonsini Goodrich & Rosati
PROFESSIONAL CORPORATION

November 20, 2003

VIA COURIER

Shawn Williams, Esq.
Milberg Weiss Bershad Hynes & Lerach LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111

Re: Howard Yue v. New Focus, Inc. et al., CV 808031

Dear Shawn:

In accordance with our agreement that New Focus, Inc. would produce on a rolling basis documents responsive to Plaintiffs' Requests for Production of Documents, enclosed herewith please find documents from the files of Sinclair Vass, which bear the bates numbers NF 216050 to NF 218163. Most if not all of the documents are marked "CONFIDENTIAL" pursuant to the Stipulation and Order Governing Confidentiality entered on July 8, 2002.

Defendants will be producing additional documents sourced to other individuals, including individuals listed in your recent letter from November 20, 2003, shortly.

Very truly yours,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

A handwritten signature in black ink, appearing to read 'Stephen W. Bucher', written over a horizontal line.

Stephen W. Bucher

Enclosures

SWB:mp

Exhibit 13

Exhibit 13

Peter T. Snow
Direct Dial: (650) 463-3088

135 nonwealth Drive
Menlo Park, California 94025
Tel: (650) 328-4600 Fax: (650) 463-2600
www.lw.com

FIRM / AFFILIATE OFFICES

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Milan	Singapore
Moscow	Tokyo
	Washington, D.C.

File No. 030031-0020

LATHAM & WATKINS LLP

January 25, 2005

REC'D JAN 26 2005

BY FEDERAL EXPRESS

Sylvia Wahba Keller, Esq.
Lerach Coughlin Stoia Geller Rudman & Robbins LLP
100 Pine Street, 26th Floor
San Francisco, CA 94111

Re: In re CV Therapeutics, Inc. Securities Litigation, No. C-03-3709-SI (N.D. Cal.)

Dear Ms. Keller:

On Saturday, January 22, 2005, we produced a DVD containing documents bates-labeled CVT00293648 – CVT00329977, which are the responsive, non-privileged hard documents collected from the offices of Luiz Belardinelli, Brent Blackburn, Christopher Chai, Michael Crager, Margaret Dillon, Carol Karp, Louis Lange, Daniel Spiegelman, Whedy Wang, and Andrew Wolff, from June 24, 2002, forward.

To assist in your review of these documents, please find attached two indexes that link each document produced to the person from whose office it was collected. The first index, titled "Index One: CVT00293648 – CVT00329977," groups the documents according to the person from whose office they were collected. The second index, titled "Index Two: CVT00293648 – CVT00329977," lists the documents in sequential order, and also references the person from whose office each document was collected.

If you have any questions regarding these indexes, please call me at (650) 463-3088.

Truly yours,



Peter T. Snow
of LATHAM & WATKINS LLP

Enclosures

Exhibit 14

Index ne: CVT00293648 - CVT0032. /7

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Belardinelli, Luiz	CVT00303462	CVT00304783
Belardinelli, Luiz	CVT00306937	CVT00307035
Belardinelli, Luiz	CVT00307160	CVT00307167
Belardinelli, Luiz	CVT00307901	CVT00307904
Belardinelli, Luiz	CVT00307938	CVT00307956
Belardinelli, Luiz	CVT00308071	CVT00308128
Belardinelli, Luiz	CVT00308416	CVT00308422
Belardinelli, Luiz	CVT00308690	CVT00308698
Belardinelli, Luiz	CVT00308885	CVT00308887
Belardinelli, Luiz	CVT00313607	CVT00313621
Belardinelli, Luiz	CVT00313885	CVT00313933
Belardinelli, Luiz	CVT00314125	CVT00314131
Belardinelli, Luiz	CVT00314135	CVT00314137
Belardinelli, Luiz	CVT00314253	CVT00314262
Belardinelli, Luiz	CVT00314302	CVT00314374
Belardinelli, Luiz	CVT00314428	CVT00314437
Belardinelli, Luiz	CVT00314475	CVT00314482
Belardinelli, Luiz	CVT00314499	CVT00314506
Belardinelli, Luiz	CVT00314829	CVT00314848
Belardinelli, Luiz	CVT00314892	CVT00314899
Belardinelli, Luiz	CVT00315094	CVT00315105
Belardinelli, Luiz	CVT00315230	CVT00315231
Belardinelli, Luiz	CVT00315354	CVT00315377
Belardinelli, Luiz	CVT00315622	CVT00315629
Belardinelli, Luiz	CVT00315953	CVT00315990
Belardinelli, Luiz	CVT00316643	CVT00316644
Belardinelli, Luiz	CVT00316666	CVT00316672
Belardinelli, Luiz	CVT00317134	CVT00317138
Belardinelli, Luiz	CVT00317147	CVT00317147
Belardinelli, Luiz	CVT00317655	CVT00317657
Belardinelli, Luiz	CVT00317670	CVT00317685
Belardinelli, Luiz	CVT00317757	CVT00317769
Belardinelli, Luiz	CVT00318200	CVT00318211
Belardinelli, Luiz	CVT00318297	CVT00318315
Belardinelli, Luiz	CVT00318358	CVT00318369
Belardinelli, Luiz	CVT00318384	CVT00318387
Belardinelli, Luiz	CVT00318556	CVT00318580
Belardinelli, Luiz	CVT00318758	CVT00318764
Belardinelli, Luiz	CVT00318776	CVT00318810
Belardinelli, Luiz	CVT00318815	CVT00318819
Belardinelli, Luiz	CVT00318965	CVT00318971
Belardinelli, Luiz	CVT00318999	CVT00319010
Belardinelli, Luiz	CVT00319175	CVT00319177
Belardinelli, Luiz	CVT00319416	CVT00319436
Belardinelli, Luiz	CVT00319510	CVT00319520
Belardinelli, Luiz	CVT00319744	CVT00319756
Belardinelli, Luiz	CVT00319763	CVT00319770
Belardinelli, Luiz	CVT00320375	CVT00320375

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Belardinelli, Luiz	CVT00320426	CVT00320432
Belardinelli, Luiz	CVT00320743	CVT00320754
Belardinelli, Luiz	CVT00320827	CVT00320834
Belardinelli, Luiz	CVT00320871	CVT00320893
Belardinelli, Luiz	CVT00321100	CVT00321118
Belardinelli, Luiz	CVT00321132	CVT00321137
Belardinelli, Luiz	CVT00321643	CVT00321651
Belardinelli, Luiz	CVT00321805	CVT00321806
Belardinelli, Luiz	CVT00321866	CVT00321875
Belardinelli, Luiz	CVT00321889	CVT00321932
Belardinelli, Luiz	CVT00321959	CVT00321991
Belardinelli, Luiz	CVT00322210	CVT00322258
Belardinelli, Luiz	CVT00322287	CVT00322288
Belardinelli, Luiz	CVT00322315	CVT00322315
Belardinelli, Luiz	CVT00322706	CVT00322715
Belardinelli, Luiz	CVT00322750	CVT00322750
Belardinelli, Luiz	CVT00322781	CVT00322792
Belardinelli, Luiz	CVT00323409	CVT00323416
Belardinelli, Luiz	CVT00323737	CVT00323749
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Belardinelli, Luiz	CVT00326858	CVT00326864
Belardinelli, Luiz	CVT00326872	CVT00326873
Belardinelli, Luiz	CVT00327201	CVT00327255
Belardinelli, Luiz	CVT00327365	CVT00327369
Belardinelli, Luiz	CVT00327426	CVT00327454
Belardinelli, Luiz	CVT00327475	CVT00327475
Belardinelli, Luiz	CVT00327479	CVT00327484
Belardinelli, Luiz	CVT00327502	CVT00327516
Belardinelli, Luiz	CVT00327648	CVT00327665
Belardinelli, Luiz	CVT00327839	CVT00327841
Belardinelli, Luiz	CVT00327925	CVT00327956
Belardinelli, Luiz	CVT00328108	CVT00328158

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Belardinelli, Luiz	CVT00328257	CVT00328289
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Belardinelli, Luiz	CVT00328514	CVT00328532
Belardinelli, Luiz	CVT00328646	CVT00328647
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Chai, Chris	CVT00314457	CVT00314462
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Chai, Chris	CVT00315646	CVT00315672
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Chai, Chris	CVT00317567	CVT00317570
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Chai, Chris	CVT00317689	CVT00317711
Chai, Chris	CVT00319178	CVT00319191
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Chai, Chris	CVT00322169	CVT00322173
Chai, Chris	CVT00322297	CVT00322303
Chai, Chris	CVT00322306	CVT00322307
Chai, Chris	CVT00322741	CVT00322743
Chai, Chris	CVT00322751	CVT00322760
Chai, Chris	CVT00322831	CVT00322831
Chai, Chris	CVT00323914	CVT00323993
Chai, Chris	CVT00324123	CVT00324144

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Chai, Chris	CVT00325525	CVT00325530
Chai, Chris	CVT00326362	CVT00326377
Chai, Chris	CVT00326564	CVT00326603
Chai, Chris	CVT00326642	CVT00326693
Chai, Chris	CVT00326729	CVT00326738
Chai, Chris	CVT00326787	CVT00326788
Chai, Chris	CVT00326815	CVT00326818
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Chai, Chris	CVT00327008	CVT00327055
Chai, Chris	CVT00327476	CVT00327478
Chai, Chris	CVT00327517	CVT00327519
Chai, Chris	CVT00327918	CVT00327924
Chai, Chris	CVT00328648	CVT00328713
Chai, Chris	CVT00329030	CVT00329045
Chai, Chris	CVT00329048	CVT00329075
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Crager, Mike	CVT00313985	CVT00313987
Crager, Mike	CVT00314145	CVT00314153
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Crager, Mike	CVT00314470	CVT00314474
Crager, Mike	CVT00314483	CVT00314489
Crager, Mike	CVT00314512	CVT00314523
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Crager, Mike	CVT00314656	CVT00314694
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Crager, Mike	CVT00315232	CVT00315245
Crager, Mike	CVT00315310	CVT00315353
Crager, Mike	CVT00315489	CVT00315494
Crager, Mike	CVT00315551	CVT00315553

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Crager, Mike	CVT00315630	CVT00315645
Crager, Mike	CVT00315717	CVT00315782
Crager, Mike	CVT00315991	CVT00316457
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Crager, Mike	CVT00316618	CVT00316619
Crager, Mike	CVT00316645	CVT00316663
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Crager, Mike	CVT00316866	CVT00316874
Crager, Mike	CVT00316934	CVT00316938
Crager, Mike	CVT00317040	CVT00317042
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Crager, Mike	CVT00317730	CVT00317747
Crager, Mike	CVT00317770	CVT00317779
Crager, Mike	CVT00317822	CVT00317823
Crager, Mike	CVT00318212	CVT00318222
Crager, Mike	CVT00318235	CVT00318240
Crager, Mike	CVT00318294	CVT00318296
Crager, Mike	CVT00318316	CVT00318350
Crager, Mike	CVT00318370	CVT00318374
Crager, Mike	CVT00318388	CVT00318391
Crager, Mike	CVT00318467	CVT00318467
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Crager, Mike	CVT00318765	CVT00318775
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Crager, Mike	CVT00318825	CVT00318841
Crager, Mike	CVT00318972	CVT00318998
Crager, Mike	CVT00319011	CVT00319015
Crager, Mike	CVT00319437	CVT00319476
Crager, Mike	CVT00319498	CVT00319505
Crager, Mike	CVT00319521	CVT00319522
Crager, Mike	CVT00319544	CVT00319553
Crager, Mike	CVT00319628	CVT00319647
Crager, Mike	CVT00319654	CVT00319660
Crager, Mike	CVT00319689	CVT00319692
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Crager, Mike	CVT00320420	CVT00320425
Crager, Mike	CVT00320835	CVT00320845
Crager, Mike	CVT00320894	CVT00320909
Crager, Mike	CVT00321081	CVT00321091

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Crager, Mike	CVT00321119	CVT00321121
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Crager, Mike	CVT00321579	CVT00321642
Crager, Mike	CVT00321661	CVT00321666
Crager, Mike	CVT00321746	CVT00321747
Crager, Mike	CVT00321880	CVT00321888
Crager, Mike	CVT00321933	CVT00321944
Crager, Mike	CVT00321992	CVT00322000
Crager, Mike	CVT00322013	CVT00322014
Crager, Mike	CVT00322074	CVT00322079
Crager, Mike	CVT00322108	CVT00322116
Crager, Mike	CVT00322162	CVT00322168
Crager, Mike	CVT00322289	CVT00322290
Crager, Mike	CVT00322304	CVT00322305
Crager, Mike	CVT00322308	CVT00322314
Crager, Mike	CVT00322329	CVT00322346
Crager, Mike	CVT00322716	CVT00322723
Crager, Mike	CVT00322738	CVT00322740
Crager, Mike	CVT00322744	CVT00322749
Crager, Mike	CVT00322793	CVT00322813
Crager, Mike	CVT00322821	CVT00322830
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Crager, Mike	CVT00326505	CVT00326509
Crager, Mike	CVT00326604	CVT00326805
Crager, Mike	CVT00326639	CVT00326641
Crager, Mike	CVT00326744	CVT00326749
Crager, Mike	CVT00326821	CVT00326823
Crager, Mike	CVT00326842	CVT00326852
Crager, Mike	CVT00327005	CVT00327007
Crager, Mike	CVT00327491	CVT00327501
Crager, Mike	CVT00327520	CVT00327647
Crager, Mike	CVT00327899	CVT00327917
Crager, Mike	CVT00328290	CVT00328305
Crager, Mike	CVT00328533	CVT00328534
Crager, Mike	CVT00329942	CVT00329970

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Dillon, Margaret	CVT00295011	CVT00296000
Dillon, Margaret	CVT00296001	CVT00297104
Dillon, Margaret	CVT00307127	CVT00307129
Dillon, Margaret	CVT00307184	CVT00307211
Dillon, Margaret	CVT00307248	CVT00307597
Dillon, Margaret	CVT00307604	CVT00307798
Dillon, Margaret	CVT00307887	CVT00307891
Dillon, Margaret	CVT00307957	CVT00307995
Dillon, Margaret	CVT00308057	CVT00308057
Dillon, Margaret	CVT00308227	CVT00308256
Dillon, Margaret	CVT00308423	CVT00308531
Dillon, Margaret	CVT00308546	CVT00308549
Dillon, Margaret	CVT00308587	CVT00308621
Dillon, Margaret	CVT00308699	CVT00308813
Dillon, Margaret	CVT00308821	CVT00308878
Dillon, Margaret	CVT00308888	CVT00308909
Dillon, Margaret	CVT00308914	CVT00309091
Dillon, Margaret	CVT00309103	CVT00309423
Dillon, Margaret	CVT00309435	CVT00309625
Dillon, Margaret	CVT00309767	CVT00309944
Dillon, Margaret	CVT00310034	CVT00310212
Dillon, Margaret	CVT00310237	CVT00311652
Dillon, Margaret	CVT00311660	CVT00313452
Dillon, Margaret	CVT00313480	CVT00313606
Dillon, Margaret	CVT00313622	CVT00313805
Dillon, Margaret	CVT00314062	CVT00314087
Dillon, Margaret	CVT00314119	CVT00314121
Dillon, Margaret	CVT00314245	CVT00314245
Dillon, Margaret	CVT00314719	CVT00314747
Dillon, Margaret	CVT00315216	CVT00315221
Dillon, Margaret	CVT00315225	CVT00315229
Dillon, Margaret	CVT00315246	CVT00315296
Dillon, Margaret	CVT00315558	CVT00315596
Dillon, Margaret	CVT00315783	CVT00315821
Dillon, Margaret	CVT00317780	CVT00317803
Dillon, Margaret	CVT00317824	CVT00317939
Dillon, Margaret	CVT00319016	CVT00319075
Dillon, Margaret	CVT00319913	CVT00320144
Dillon, Margaret	CVT00320391	CVT00320392
Dillon, Margaret	CVT00320720	CVT00320729
Dillon, Margaret	CVT00321092	CVT00321095
Dillon, Margaret	CVT00321652	CVT00321654
Dillon, Margaret	CVT00321774	CVT00321782
Dillon, Margaret	CVT00322055	CVT00322061
Dillon, Margaret	CVT00322849	CVT00323127
Dillon, Margaret	CVT00325158	CVT00325221
Dillon, Margaret	CVT00325404	CVT00325447
Dillon, Margaret	CVT00326981	CVT00327001

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Dillon, Margaret	CVT00328188	CVT00328200
Dillon, Margaret	CVT00328249	CVT00328249
Dillon, Margaret	CVT00328510	CVT00328513
Dillon, Margaret	CVT00328633	CVT00328645
Dillon, Margaret	CVT00328717	CVT00329029
Dillon, Margaret	CVT00329076	CVT00329188
Dillon, Margaret	CVT00329547	CVT00329770
Dillon, Margaret	CVT00329780	CVT00329810
Dillon, Margaret	CVT00329818	CVT00329941
Dillon, Mike	CVT00318622	CVT00318628
Karp, Carol	CVT00297105	CVT00297596
Karp, Carol	CVT00307137	CVT00307137
Karp, Carol	CVT00307155	CVT00307158
Karp, Carol	CVT00313806	CVT00313813
Karp, Carol	CVT00314138	CVT00314144
Karp, Carol	CVT00314154	CVT00314178
Karp, Carol	CVT00314246	CVT00314252
Karp, Carol	CVT00314411	CVT00314427
Karp, Carol	CVT00316458	CVT00316519
Karp, Carol	CVT00316875	CVT00316903
Karp, Carol	CVT00316946	CVT00316963
Karp, Carol	CVT00317001	CVT00317013
Karp, Carol	CVT00317051	CVT00317051
Karp, Carol	CVT00317092	CVT00317133
Karp, Carol	CVT00317516	CVT00317518
Karp, Carol	CVT00317940	CVT00318199
Karp, Carol	CVT00318629	CVT00318634
Karp, Carol	CVT00318842	CVT00318925
Karp, Carol	CVT00320145	CVT00320374
Karp, Carol	CVT00320615	CVT00320719
Karp, Carol	CVT00321140	CVT00321571
Karp, Carol	CVT00321748	CVT00321773
Karp, Carol	CVT00321783	CVT00321804
Karp, Carol	CVT00321876	CVT00321879
Karp, Carol	CVT00322015	CVT00322054
Karp, Carol	CVT00322062	CVT00322069
Karp, Carol	CVT00322147	CVT00322161
Karp, Carol	CVT00322259	CVT00322268
Karp, Carol	CVT00322761	CVT00322768
Karp, Carol	CVT00322843	CVT00322848
Karp, Carol	CVT00323128	CVT00323408
Karp, Carol	CVT00323417	CVT00323419
Karp, Carol	CVT00324257	CVT00324268
Karp, Carol	CVT00326111	CVT00326111
Karp, Carol	CVT00326824	CVT00326825
Karp, Carol	CVT00327957	CVT00328107
Karp, Carol	CVT00329771	CVT00329774
Lange, Louis	CVT00304784	CVT00304784

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Lange, Louis	CVT00304785	CVT00305847
Lange, Louis	CVT00307036	CVT00307090
Lange, Louis	CVT00309092	CVT00309099
Lange, Louis	CVT00309430	CVT00309434
Lange, Louis	CVT00309651	CVT00309655
Lange, Louis	CVT00313940	CVT00313956
Lange, Louis	CVT00314918	CVT00314925
Lange, Louis	CVT00315106	CVT00315160
Lange, Louis	CVT00316770	CVT00316779
Lange, Louis	CVT00317052	CVT00317058
Lange, Louis	CVT00317650	CVT00317654
Lange, Louis	CVT00319624	CVT00319627
Lange, Louis	CVT00320433	CVT00320509
Lange, Louis	CVT00320596	CVT00320614
Lange, Louis	CVT00320846	CVT00320853
Lange, Louis	CVT00321743	CVT00321745
Lange, Louis	CVT00321945	CVT00321958
Lange, Louis	CVT00322011	CVT00322012
Lange, Louis	CVT00322073	CVT00322073
Lange, Louis	CVT00322269	CVT00322277
Lange, Louis	CVT00322724	CVT00322737
Lange, Louis	CVT00323750	CVT00323909
Lange, Louis	CVT00324020	CVT00324023
Lange, Louis	CVT00324214	CVT00324237
Lange, Louis	CVT00324269	CVT00324269
Lange, Louis	CVT00325118	CVT00325123
Lange, Louis	CVT00325378	CVT00325380
Lange, Louis	CVT00325694	CVT00325696
Lange, Louis	CVT00326186	CVT00326194
Lange, Louis	CVT00326551	CVT00326552
Lange, Louis	CVT00326559	CVT00326563
Lange, Louis	CVT00326606	CVT00326638
Lange, Louis	CVT00326704	CVT00326728
Lange, Louis	CVT00328584	CVT00328632
Lange, Louis	CVT00329046	CVT00329047
Lange, Louis	CVT00329543	CVT00329546
Lange, Louis	CVT00329811	CVT00329817
Spiegelman, Dan	CVT00294698	CVT00294715
Spiegelman, Dan	CVT00294716	CVT00295010
Spiegelman, Dan	CVT00307905	CVT00307910
Spiegelman, Dan	CVT00308176	CVT00308226
Spiegelman, Dan	CVT00310213	CVT00310236
Spiegelman, Dan	CVT00311653	CVT00311659
Spiegelman, Dan	CVT00313453	CVT00313479
Spiegelman, Dan	CVT00314116	CVT00314118
Spiegelman, Dan	CVT00314179	CVT00314191
Spiegelman, Dan	CVT00315495	CVT00315529
Spiegelman, Dan	CVT00318351	CVT00318357

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Spiegelman, Dan	CVT00318392	CVT00318461
Spiegelman, Dan	CVT00319554	CVT00319588
Spiegelman, Dan	CVT00322291	CVT00322296
Spiegelman, Dan	CVT00322316	CVT00322328
Spiegelman, Dan	CVT00325570	CVT00325624
Spiegelman, Dan	CVT00325691	CVT00325693
Spiegelman, Dan	CVT00326085	CVT00326110
Spiegelman, Dan	CVT00326513	CVT00326514
Spiegelman, Dan	CVT00326545	CVT00326548
Spiegelman, Dan	CVT00326750	CVT00326753
Spiegelman, Dan	CVT00327370	CVT00327425
Spiegelman, Dan	CVT00328420	CVT00328509
Wang, Whedy	CVT00302704	CVT00302744
Wang, Whedy	CVT00302745	CVT00303461
Wang, Whedy	CVT00307091	CVT00307126
Wang, Whedy	CVT00307130	CVT00307136
Wang, Whedy	CVT00307138	CVT00307154
Wang, Whedy	CVT00307159	CVT00307159
Wang, Whedy	CVT00307168	CVT00307183
Wang, Whedy	CVT00307212	CVT00307247
Wang, Whedy	CVT00307598	CVT00307603
Wang, Whedy	CVT00307850	CVT00307865
Wang, Whedy	CVT00307876	CVT00307886
Wang, Whedy	CVT00307892	CVT00307900
Wang, Whedy	CVT00307918	CVT00307937
Wang, Whedy	CVT00307996	CVT00308056
Wang, Whedy	CVT00308058	CVT00308063
Wang, Whedy	CVT00308129	CVT00308147
Wang, Whedy	CVT00308167	CVT00308175
Wang, Whedy	CVT00308257	CVT00308269
Wang, Whedy	CVT00308367	CVT00308415
Wang, Whedy	CVT00308532	CVT00308545
Wang, Whedy	CVT00308550	CVT00308586
Wang, Whedy	CVT00309100	CVT00309102
Wang, Whedy	CVT00309626	CVT00309650
Wang, Whedy	CVT00313824	CVT00313884
Wang, Whedy	CVT00314059	CVT00314061
Wang, Whedy	CVT00314088	CVT00314115
Wang, Whedy	CVT00314122	CVT00314124
Wang, Whedy	CVT00314132	CVT00314134
Wang, Whedy	CVT00314204	CVT00314207
Wang, Whedy	CVT00314267	CVT00314301
Wang, Whedy	CVT00314375	CVT00314393
Wang, Whedy	CVT00314463	CVT00314469
Wang, Whedy	CVT00314490	CVT00314498
Wang, Whedy	CVT00314507	CVT00314511
Wang, Whedy	CVT00314538	CVT00314587
Wang, Whedy	CVT00314642	CVT00314655

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00314685	CVT00314712
Wang, Whedy	CVT00314748	CVT00314756
Wang, Whedy	CVT00314797	CVT00314828
Wang, Whedy	CVT00314888	CVT00314891
Wang, Whedy	CVT00314903	CVT00314917
Wang, Whedy	CVT00315161	CVT00315173
Wang, Whedy	CVT00315185	CVT00315193
Wang, Whedy	CVT00315222	CVT00315224
Wang, Whedy	CVT00315297	CVT00315309
Wang, Whedy	CVT00315378	CVT00315488
Wang, Whedy	CVT00315530	CVT00315550
Wang, Whedy	CVT00315554	CVT00315557
Wang, Whedy	CVT00315597	CVT00315621
Wang, Whedy	CVT00315673	CVT00315716
Wang, Whedy	CVT00315907	CVT00315952
Wang, Whedy	CVT00316520	CVT00316547
Wang, Whedy	CVT00316564	CVT00316606
Wang, Whedy	CVT00316614	CVT00316617
Wang, Whedy	CVT00316620	CVT00316642
Wang, Whedy	CVT00316664	CVT00316665
Wang, Whedy	CVT00316706	CVT00316739
Wang, Whedy	CVT00316743	CVT00316769
Wang, Whedy	CVT00316789	CVT00316799
Wang, Whedy	CVT00316854	CVT00316865
Wang, Whedy	CVT00316909	CVT00316933
Wang, Whedy	CVT00316939	CVT00316945
Wang, Whedy	CVT00316964	CVT00316972
Wang, Whedy	CVT00317027	CVT00317039
Wang, Whedy	CVT00317043	CVT00317050
Wang, Whedy	CVT00317142	CVT00317146
Wang, Whedy	CVT00317150	CVT00317180
Wang, Whedy	CVT00317313	CVT00317393
Wang, Whedy	CVT00317493	CVT00317515
Wang, Whedy	CVT00317519	CVT00317559
Wang, Whedy	CVT00317571	CVT00317585
Wang, Whedy	CVT00317666	CVT00317669
Wang, Whedy	CVT00317712	CVT00317729
Wang, Whedy	CVT00317748	CVT00317756
Wang, Whedy	CVT00317804	CVT00317821
Wang, Whedy	CVT00318223	CVT00318234
Wang, Whedy	CVT00318241	CVT00318293
Wang, Whedy	CVT00318375	CVT00318383
Wang, Whedy	CVT00318462	CVT00318466
Wang, Whedy	CVT00318468	CVT00318470
Wang, Whedy	CVT00318494	CVT00318555
Wang, Whedy	CVT00318584	CVT00318621
Wang, Whedy	CVT00318635	CVT00318757
Wang, Whedy	CVT00318820	CVT00318824

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00318926	CVT00318964
Wang, Whedy	CVT00319076	CVT00319174
Wang, Whedy	CVT00319192	CVT00319415
Wang, Whedy	CVT00319477	CVT00319497
Wang, Whedy	CVT00319506	CVT00319509
Wang, Whedy	CVT00319523	CVT00319543
Wang, Whedy	CVT00319648	CVT00319653
Wang, Whedy	CVT00319661	CVT00319668
Wang, Whedy	CVT00319693	CVT00319700
Wang, Whedy	CVT00319731	CVT00319743
Wang, Whedy	CVT00319757	CVT00319762
Wang, Whedy	CVT00319771	CVT00319912
Wang, Whedy	CVT00320393	CVT00320419
Wang, Whedy	CVT00320523	CVT00320595
Wang, Whedy	CVT00320730	CVT00320742
Wang, Whedy	CVT00320755	CVT00320826
Wang, Whedy	CVT00320854	CVT00320870
Wang, Whedy	CVT00320910	CVT00321080
Wang, Whedy	CVT00321096	CVT00321099
Wang, Whedy	CVT00321122	CVT00321131
Wang, Whedy	CVT00321572	CVT00321578
Wang, Whedy	CVT00321655	CVT00321660
Wang, Whedy	CVT00321807	CVT00321841
Wang, Whedy	CVT00322001	CVT00322010
Wang, Whedy	CVT00322070	CVT00322072
Wang, Whedy	CVT00322080	CVT00322107
Wang, Whedy	CVT00322117	CVT00322146
Wang, Whedy	CVT00322283	CVT00322286
Wang, Whedy	CVT00322814	CVT00322820
Wang, Whedy	CVT00322832	CVT00322836
Wang, Whedy	CVT00323910	CVT00323913
Wang, Whedy	CVT00323994	CVT00324015
Wang, Whedy	CVT00324024	CVT00324042
Wang, Whedy	CVT00324145	CVT00324148
Wang, Whedy	CVT00325312	CVT00325316
Wang, Whedy	CVT00325375	CVT00325377
Wang, Whedy	CVT00325381	CVT00325381
Wang, Whedy	CVT00325385	CVT00325399
Wang, Whedy	CVT00325564	CVT00325589
Wang, Whedy	CVT00325678	CVT00325679
Wang, Whedy	CVT00325879	CVT00325888
Wang, Whedy	CVT00325914	CVT00326072
Wang, Whedy	CVT00326112	CVT00326138
Wang, Whedy	CVT00326195	CVT00326289
Wang, Whedy	CVT00326306	CVT00326325
Wang, Whedy	CVT00326331	CVT00326361
Wang, Whedy	CVT00326384	CVT00326473
Wang, Whedy	CVT00326510	CVT00326512

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00326515	CVT00326520
Wang, Whedy	CVT00326549	CVT00326550
Wang, Whedy	CVT00326553	CVT00326558
Wang, Whedy	CVT00326694	CVT00326703
Wang, Whedy	CVT00326739	CVT00326743
Wang, Whedy	CVT00326754	CVT00326759
Wang, Whedy	CVT00326789	CVT00326814
Wang, Whedy	CVT00326819	CVT00326820
Wang, Whedy	CVT00326826	CVT00326835
Wang, Whedy	CVT00326855	CVT00326857
Wang, Whedy	CVT00326865	CVT00326871
Wang, Whedy	CVT00326874	CVT00326874
Wang, Whedy	CVT00326954	CVT00326980
Wang, Whedy	CVT00327310	CVT00327364
Wang, Whedy	CVT00327455	CVT00327474
Wang, Whedy	CVT00327485	CVT00327490
Wang, Whedy	CVT00327752	CVT00327838
Wang, Whedy	CVT00328253	CVT00328256
Wang, Whedy	CVT00329189	CVT00329190
Wang, Whedy	CVT00297597	CVT00297600
Wolff, Andy	CVT00297601	CVT00302703
Wolff, Andy	CVT00306936	CVT00306936
Wolff, Andy	CVT00307866	CVT00307875
Wolff, Andy	CVT00307911	CVT00307917
Wolff, Andy	CVT00308064	CVT00308070
Wolff, Andy	CVT00308148	CVT00308166
Wolff, Andy	CVT00308622	CVT00308689
Wolff, Andy	CVT00308814	CVT00308820
Wolff, Andy	CVT00308879	CVT00308884
Wolff, Andy	CVT00308910	CVT00308913
Wolff, Andy	CVT00309424	CVT00309429
Wolff, Andy	CVT00313814	CVT00313823
Wolff, Andy	CVT00313957	CVT00313984
Wolff, Andy	CVT00313988	CVT00314035
Wolff, Andy	CVT00314263	CVT00314266
Wolff, Andy	CVT00314879	CVT00314887
Wolff, Andy	CVT00315822	CVT00315906
Wolff, Andy	CVT00316548	CVT00316563
Wolff, Andy	CVT00316780	CVT00316788
Wolff, Andy	CVT00316904	CVT00316908
Wolff, Andy	CVT00317014	CVT00317026
Wolff, Andy	CVT00317310	CVT00317312
Wolff, Andy	CVT00320510	CVT00320522
Wolff, Andy	CVT00321731	CVT00321742
Wolff, Andy	CVT00322174	CVT00322209
Wolff, Andy	CVT00322278	CVT00322282
Wolff, Andy	CVT00322347	CVT00322705
Wolff, Andy	CVT00322769	CVT00322780

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wolff, Andy	CVT00323420	CVT00323736
Wolff, Andy	CVT00325382	CVT00325384
Wolff, Andy	CVT00325714	CVT00325714
Wolff, Andy	CVT00325743	CVT00325767
Wolff, Andy	CVT00325843	CVT00325878
Wolff, Andy	CVT00326290	CVT00326299
Wolff, Andy	CVT00327002	CVT00327004
Wolff, Andy	CVT00329775	CVT00329779

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Blackburn, Brent	CVT00293648	CVT00293795
Blackburn, Brent	CVT00293796	CVT00294697
Spiegelman, Dan	CVT00294698	CVT00294715
Spiegelman, Dan	CVT00294716	CVT00295010
Dillon, Margaret	CVT00295011	CVT00296000
Dillon, Margaret	CVT00296001	CVT00297104
Karp, Carol	CVT00297105	CVT00297596
Wolff, Andy	CVT00297597	CVT00297800
Wolff, Andy	CVT00297601	CVT00302703
Wang, Whedy	CVT00302704	CVT00302744
Wang, Whedy	CVT00302745	CVT00303461
Belardinelli, Luiz	CVT00303462	CVT00304783
Lange, Louis	CVT00304784	CVT00304784
Lange, Louis	CVT00304785	CVT00305847
Crager, Mike	CVT00305848	CVT00305853
Crager, Mike	CVT00305854	CVT00306588
Chai, Chris	CVT00306589	CVT00306593
Chai, Chris	CVT00306594	CVT00306935
Wolff, Andy	CVT00306936	CVT00306936
Belardinelli, Luiz	CVT00306937	CVT00307035
Lange, Louis	CVT00307036	CVT00307090
Wang, Whedy	CVT00307091	CVT00307126
Dillon, Margaret	CVT00307127	CVT00307129
Wang, Whedy	CVT00307130	CVT00307136
Karp, Carol	CVT00307137	CVT00307137
Wang, Whedy	CVT00307138	CVT00307154
Karp, Carol	CVT00307155	CVT00307158
Wang, Whedy	CVT00307159	CVT00307159
Belardinelli, Luiz	CVT00307160	CVT00307167
Wang, Whedy	CVT00307168	CVT00307183
Dillon, Margaret	CVT00307184	CVT00307211
Wang, Whedy	CVT00307212	CVT00307247
Dillon, Margaret	CVT00307248	CVT00307597
Wang, Whedy	CVT00307598	CVT00307603
Dillon, Margaret	CVT00307604	CVT00307798
Crager, Mike	CVT00307799	CVT00307821
Chai, Chris	CVT00307822	CVT00307849
Wang, Whedy	CVT00307850	CVT00307865
Wolff, Andy	CVT00307866	CVT00307875
Wang, Whedy	CVT00307876	CVT00307886
Dillon, Margaret	CVT00307887	CVT00307891
Wang, Whedy	CVT00307892	CVT00307900
Belardinelli, Luiz	CVT00307901	CVT00307904
Spiegelman, Dan	CVT00307905	CVT00307910
Wolff, Andy	CVT00307911	CVT00307917
Wang, Whedy	CVT00307918	CVT00307937
Belardinelli, Luiz	CVT00307938	CVT00307956
Dillon, Margaret	CVT00307957	CVT00307995

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00307996	CVT00308056
Dillon, Margaret	CVT00308057	CVT00308057
Wang, Whedy	CVT00308058	CVT00308063
Wolff, Andy	CVT00308064	CVT00308070
Belardinelli, Luiz	CVT00308071	CVT00308128
Wang, Whedy	CVT00308129	CVT00308147
Wolff, Andy	CVT00308148	CVT00308166
Wang, Whedy -	CVT00308167	CVT00308175
Spiegelman, Dan	CVT00308176	CVT00308226
Dillon, Margaret	CVT00308227	CVT00308256
Wang, Whedy	CVT00308257	CVT00308269
Crager, Mike	CVT00308270	CVT00308366
Wang, Whedy	CVT00308367	CVT00308415
Belardinelli, Luiz	CVT00308416	CVT00308422
Dillon, Margaret	CVT00308423	CVT00308531
Wang, Whedy	CVT00308532	CVT00308545
Dillon, Margaret	CVT00308546	CVT00308549
Wang, Whedy	CVT00308550	CVT00308586
Dillon, Margaret	CVT00308587	CVT00308621
Wolff, Andy	CVT00308622	CVT00308689
Belardinelli, Luiz	CVT00308690	CVT00308698
Dillon, Margaret	CVT00308699	CVT00308813
Wolff, Andy	CVT00308814	CVT00308820
Dillon, Margaret	CVT00308821	CVT00308878
Wolff, Andy	CVT00308879	CVT00308884
Belardinelli, Luiz	CVT00308885	CVT00308887
Dillon, Margaret	CVT00308888	CVT00308909
Wolff, Andy	CVT00308910	CVT00308913
Dillon, Margaret	CVT00308914	CVT00309091
Lange, Louis	CVT00309092	CVT00309099
Wang, Whedy	CVT00309100	CVT00309102
Dillon, Margaret	CVT00309103	CVT00309423
Wolff, Andy	CVT00309424	CVT00309429
Lange, Louis	CVT00309430	CVT00309434
Dillon, Margaret	CVT00309435	CVT00309625
Wang, Whedy	CVT00309626	CVT00309650
Lange, Louis	CVT00309651	CVT00309655
Crager, Mike	CVT00309656	CVT00309681
Chai, Chris	CVT00309682	CVT00309766
Dillon, Margaret	CVT00309767	CVT00309944
Crager, Mike	CVT00309945	CVT00310033
Dillon, Margaret	CVT00310034	CVT00310212
Spiegelman, Dan	CVT00310213	CVT00310236
Dillon, Margaret	CVT00310237	CVT00311652
Spiegelman, Dan	CVT00311653	CVT00311659
Dillon, Margaret	CVT00311660	CVT00313452
Spiegelman, Dan	CVT00313453	CVT00313479
Dillon, Margaret	CVT00313480	CVT00313606

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Belardinelli, Luiz	CVT00313607	CVT00313621
Dillon, Margaret	CVT00313622	CVT00313805
Karp, Carol	CVT00313806	CVT00313813
Wolff, Andy	CVT00313814	CVT00313823
Wang, Whedy	CVT00313824	CVT00313884
Belardinelli, Luiz	CVT00313885	CVT00313933
Crager, Mike	CVT00313934	CVT00313939
Lange, Louis -	CVT00313940	CVT00313956
Wolff, Andy	CVT00313957	CVT00313984
Crager, Mike	CVT00313985	CVT00313987
Wolff, Andy	CVT00313988	CVT00314035
Chal, Chris	CVT00314036	CVT00314058
Wang, Whedy	CVT00314059	CVT00314061
Dillon, Margaret	CVT00314062	CVT00314087
Wang, Whedy	CVT00314088	CVT00314115
Spiegelman, Dan	CVT00314116	CVT00314118
Dillon, Margaret	CVT00314119	CVT00314121
Wang, Whedy	CVT00314122	CVT00314124
Belardinelli, Luiz	CVT00314125	CVT00314131
Wang, Whedy	CVT00314132	CVT00314134
Belardinelli, Luiz	CVT00314135	CVT00314137
Karp, Carol	CVT00314138	CVT00314144
Crager, Mike	CVT00314145	CVT00314153
Karp, Carol	CVT00314154	CVT00314178
Spiegelman, Dan	CVT00314179	CVT00314191
Blackburn, Brent	CVT00314192	CVT00314203
Wang, Whedy	CVT00314204	CVT00314207
Crager, Mike	CVT00314208	CVT00314244
Dillon, Margaret	CVT00314245	CVT00314245
Karp, Carol	CVT00314246	CVT00314252
Belardinelli, Luiz	CVT00314253	CVT00314262
Wolff, Andy	CVT00314263	CVT00314266
Wang, Whedy	CVT00314267	CVT00314301
Belardinelli, Luiz	CVT00314302	CVT00314374
Wang, Whedy	CVT00314375	CVT00314393
Crager, Mike	CVT00314394	CVT00314410
Karp, Carol	CVT00314411	CVT00314427
Belardinelli, Luiz	CVT00314428	CVT00314437
Crager, Mike	CVT00314438	CVT00314456
Chal, Chris	CVT00314457	CVT00314462
Wang, Whedy	CVT00314463	CVT00314469
Crager, Mike	CVT00314470	CVT00314474
Belardinelli, Luiz	CVT00314475	CVT00314482
Crager, Mike	CVT00314483	CVT00314489
Wang, Whedy	CVT00314490	CVT00314498
Belardinelli, Luiz	CVT00314499	CVT00314506
Wang, Whedy	CVT00314507	CVT00314511
Crager, Mike	CVT00314512	CVT00314523

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Chai, Chris	CVT00314524	CVT00314537
Wang, Whedy	CVT00314538	CVT00314587
Crager, Mike	CVT00314588	CVT00314641
Wang, Whedy	CVT00314642	CVT00314655
Crager, Mike	CVT00314656	CVT00314694
Wang, Whedy	CVT00314695	CVT00314712
Crager, Mike	CVT00314713	CVT00314718
Dillon, Margaret	CVT00314719	CVT00314747
Wang, Whedy	CVT00314748	CVT00314756
Crager, Mike	CVT00314757	CVT00314796
Wang, Whedy	CVT00314797	CVT00314828
Belardinelli, Luiz	CVT00314829	CVT00314848
Crager, Mike	CVT00314849	CVT00314878
Wolff, Andy	CVT00314879	CVT00314887
Wang, Whedy	CVT00314888	CVT00314891
Belardinelli, Luiz	CVT00314892	CVT00314899
Crager, Mike	CVT00314900	CVT00314902
Wang, Whedy	CVT00314903	CVT00314917
Lange, Louis	CVT00314918	CVT00314925
Crager, Mike	CVT00314926	CVT00314971
Blackburn, Brent	CVT00314972	CVT00315093
Belardinelli, Luiz	CVT00315094	CVT00315105
Lange, Louis	CVT00315106	CVT00315160
Wang, Whedy	CVT00315161	CVT00315173
Crager, Mike	CVT00315174	CVT00315175
Chai, Chris	CVT00315176	CVT00315184
Wang, Whedy	CVT00315185	CVT00315193
Crager, Mike	CVT00315194	CVT00315215
Dillon, Margaret	CVT00315216	CVT00315221
Wang, Whedy	CVT00315222	CVT00315224
Dillon, Margaret	CVT00315225	CVT00315229
Belardinelli, Luiz	CVT00315230	CVT00315231
Crager, Mike	CVT00315232	CVT00315245
Dillon, Margaret	CVT00315246	CVT00315296
Wang, Whedy	CVT00315297	CVT00315309
Crager, Mike	CVT00315310	CVT00315353
Belardinelli, Luiz	CVT00315354	CVT00315377
Wang, Whedy	CVT00315378	CVT00315488
Crager, Mike	CVT00315489	CVT00315494
Spiegelman, Dan	CVT00315495	CVT00315529
Wang, Whedy	CVT00315530	CVT00315550
Crager, Mike	CVT00315551	CVT00315553
Wang, Whedy	CVT00315554	CVT00315557
Dillon, Margaret	CVT00315558	CVT00315596
Wang, Whedy	CVT00315597	CVT00315621
Belardinelli, Luiz	CVT00315622	CVT00315629
Crager, Mike	CVT00315630	CVT00315645
Chai, Chris	CVT00315646	CVT00315672

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00315673	CVT00315716
Crager, Mike	CVT00315717	CVT00315782
Dillon, Margaret	CVT00315783	CVT00315821
Wolff, Andy	CVT00315822	CVT00315906
Wang, Whedy	CVT00315907	CVT00315952
Belardinelli, Luiz	CVT00315953	CVT00315990
Crager, Mike	CVT00315991	CVT00316457
Karp, Carol	CVT00316458	CVT00316519
Wang, Whedy	CVT00316520	CVT00316547
Wolff, Andy	CVT00316548	CVT00316563
Wang, Whedy	CVT00316564	CVT00316606
Crager, Mike	CVT00316607	CVT00316613
Wang, Whedy	CVT00316614	CVT00316617
Crager, Mike	CVT00316618	CVT00316619
Wang, Whedy	CVT00316620	CVT00316642
Belardinelli, Luiz	CVT00316643	CVT00316644
Crager, Mike	CVT00316645	CVT00316663
Wang, Whedy	CVT00316664	CVT00316665
Belardinelli, Luiz	CVT00316666	CVT00316672
Blackburn, Brent	CVT00316673	CVT00316705
Wang, Whedy	CVT00316706	CVT00316739
Crager, Mike	CVT00316740	CVT00316742
Wang, Whedy	CVT00316743	CVT00316769
Lange, Louis	CVT00316770	CVT00316779
Wolff, Andy	CVT00316780	CVT00316788
Wang, Whedy	CVT00316789	CVT00316799
Chai, Chris	CVT00316800	CVT00316853
Wang, Whedy	CVT00316854	CVT00316865
Crager, Mike	CVT00316866	CVT00316874
Karp, Carol	CVT00316875	CVT00316903
Wolff, Andy	CVT00316904	CVT00316908
Wang, Whedy	CVT00316909	CVT00316933
Crager, Mike	CVT00316934	CVT00316938
Wang, Whedy	CVT00316939	CVT00316945
Karp, Carol	CVT00316946	CVT00316963
Wang, Whedy	CVT00316964	CVT00316972
Chai, Chris	CVT00316973	CVT00317000
Karp, Carol	CVT00317001	CVT00317013
Wolff, Andy	CVT00317014	CVT00317026
Wang, Whedy	CVT00317027	CVT00317039
Crager, Mike	CVT00317040	CVT00317042
Wang, Whedy	CVT00317043	CVT00317050
Karp, Carol	CVT00317051	CVT00317051
Lange, Louis	CVT00317052	CVT00317058
Crager, Mike	CVT00317059	CVT00317091
Karp, Carol	CVT00317092	CVT00317133
Belardinelli, Luiz	CVT00317134	CVT00317138
Chai, Chris	CVT00317139	CVT00317141

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00317142	CVT00317146
Belardinelli, Luiz	CVT00317147	CVT00317147
Crager, Mike	CVT00317148	CVT00317149
Wang, Whedy	CVT00317150	CVT00317180
Crager, Mike	CVT00317181	CVT00317309
Wolff, Andy	CVT00317310	CVT00317312
Wang, Whedy	CVT00317313	CVT00317393
Crager, Mike -	CVT00317394	CVT00317492
Wang, Whedy	CVT00317493	CVT00317515
Karp, Carol	CVT00317516	CVT00317518
Wang, Whedy	CVT00317519	CVT00317559
Crager, Mike	CVT00317560	CVT00317566
Chai, Chris	CVT00317567	CVT00317570
Wang, Whedy	CVT00317571	CVT00317585
Crager, Mike	CVT00317586	CVT00317589
Chai, Chris	CVT00317590	CVT00317649
Lange, Louis	CVT00317650	CVT00317654
Belardinelli, Luiz	CVT00317655	CVT00317657
Crager, Mike	CVT00317658	CVT00317665
Wang, Whedy	CVT00317666	CVT00317669
Belardinelli, Luiz	CVT00317670	CVT00317685
Crager, Mike	CVT00317686	CVT00317688
Chai, Chris	CVT00317689	CVT00317711
Wang, Whedy	CVT00317712	CVT00317729
Crager, Mike	CVT00317730	CVT00317747
Wang, Whedy	CVT00317748	CVT00317756
Belardinelli, Luiz	CVT00317757	CVT00317769
Crager, Mike	CVT00317770	CVT00317779
Dillon, Margaret	CVT00317780	CVT00317803
Wang, Whedy	CVT00317804	CVT00317821
Crager, Mike	CVT00317822	CVT00317823
Dillon, Margaret	CVT00317824	CVT00317939
Karp, Carol	CVT00317940	CVT00318199
Belardinelli, Luiz	CVT00318200	CVT00318211
Crager, Mike	CVT00318212	CVT00318222
Wang, Whedy	CVT00318223	CVT00318234
Crager, Mike	CVT00318235	CVT00318240
Wang, Whedy	CVT00318241	CVT00318293
Crager, Mike	CVT00318294	CVT00318296
Belardinelli, Luiz	CVT00318297	CVT00318315
Crager, Mike	CVT00318316	CVT00318350
Spiegelman, Dan	CVT00318351	CVT00318357
Belardinelli, Luiz	CVT00318358	CVT00318369
Crager, Mike	CVT00318370	CVT00318374
Wang, Whedy	CVT00318375	CVT00318383
Belardinelli, Luiz	CVT00318384	CVT00318387
Crager, Mike	CVT00318388	CVT00318391
Spiegelman, Dan	CVT00318392	CVT00318461

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00318462	CVT00318466
Crager, Mike	CVT00318467	CVT00318467
Wang, Whedy	CVT00318468	CVT00318470
Crager, Mike	CVT00318471	CVT00318493
Wang, Whedy	CVT00318494	CVT00318555
Belardinelli, Luiz	CVT00318556	CVT00318580
Crager, Mike	CVT00318581	CVT00318583
Wang, Whedy -	CVT00318584	CVT00318621
Dillon, Mike	CVT00318622	CVT00318628
Karp, Carol	CVT00318629	CVT00318634
Wang, Whedy	CVT00318635	CVT00318757
Belardinelli, Luiz	CVT00318758	CVT00318764
Crager, Mike	CVT00318765	CVT00318775
Belardinelli, Luiz	CVT00318776	CVT00318810
Crager, Mike	CVT00318811	CVT00318814
Belardinelli, Luiz	CVT00318815	CVT00318819
Wang, Whedy	CVT00318820	CVT00318824
Crager, Mike	CVT00318825	CVT00318841
Karp, Carol	CVT00318842	CVT00318925
Wang, Whedy	CVT00318926	CVT00318964
Belardinelli, Luiz	CVT00318965	CVT00318971
Crager, Mike	CVT00318972	CVT00318998
Belardinelli, Luiz	CVT00318999	CVT00319010
Crager, Mike	CVT00319011	CVT00319015
Dillon, Margaret	CVT00319016	CVT00319075
Wang, Whedy	CVT00319076	CVT00319174
Belardinelli, Luiz	CVT00319175	CVT00319177
Chai, Chris	CVT00319178	CVT00319191
Wang, Whedy	CVT00319192	CVT00319415
Belardinelli, Luiz	CVT00319416	CVT00319436
Crager, Mike	CVT00319437	CVT00319476
Wang, Whedy	CVT00319477	CVT00319497
Crager, Mike	CVT00319498	CVT00319505
Wang, Whedy	CVT00319506	CVT00319509
Belardinelli, Luiz	CVT00319510	CVT00319520
Crager, Mike	CVT00319521	CVT00319522
Wang, Whedy	CVT00319523	CVT00319543
Crager, Mike	CVT00319544	CVT00319553
Spiegelman, Dan	CVT00319554	CVT00319588
Chai, Chris	CVT00319589	CVT00319623
Lange, Louis	CVT00319624	CVT00319627
Crager, Mike	CVT00319628	CVT00319647
Wang, Whedy	CVT00319648	CVT00319653
Crager, Mike	CVT00319654	CVT00319660
Wang, Whedy	CVT00319661	CVT00319668
Crager, Mike	CVT00319669	CVT00319692
Wang, Whedy	CVT00319693	CVT00319700
Crager, Mike	CVT00319701	CVT00319730

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Wang, Whedy	CVT00319731	CVT00319743
Belardinelli, Luiz	CVT00319744	CVT00319756
Wang, Whedy	CVT00319757	CVT00319762
Belardinelli, Luiz	CVT00319763	CVT00319770
Wang, Whedy	CVT00319771	CVT00319912
Dillon, Margaret	CVT00319913	CVT00320144
Karp, Carol	CVT00320145	CVT00320374
Belardinelli, Luiz	CVT00320375	CVT00320375
Crager, Mike	CVT00320376	CVT00320390
Dillon, Margaret	CVT00320391	CVT00320392
Wang, Whedy	CVT00320393	CVT00320419
Crager, Mike	CVT00320420	CVT00320425
Belardinelli, Luiz	CVT00320426	CVT00320432
Lange, Louis	CVT00320433	CVT00320509
Wolff, Andy	CVT00320510	CVT00320522
Wang, Whedy	CVT00320523	CVT00320595
Lange, Louis	CVT00320596	CVT00320614
Karp, Carol	CVT00320615	CVT00320719
Dillon, Margaret	CVT00320720	CVT00320729
Wang, Whedy	CVT00320730	CVT00320742
Belardinelli, Luiz	CVT00320743	CVT00320754
Wang, Whedy	CVT00320755	CVT00320826
Belardinelli, Luiz	CVT00320827	CVT00320834
Crager, Mike	CVT00320835	CVT00320845
Lange, Louis	CVT00320846	CVT00320853
Wang, Whedy	CVT00320854	CVT00320870
Belardinelli, Luiz	CVT00320871	CVT00320893
Crager, Mike	CVT00320894	CVT00320909
Wang, Whedy	CVT00320910	CVT00321080
Crager, Mike	CVT00321081	CVT00321091
Dillon, Margaret	CVT00321092	CVT00321095
Wang, Whedy	CVT00321096	CVT00321099
Belardinelli, Luiz	CVT00321100	CVT00321118
Crager, Mike	CVT00321119	CVT00321121
Wang, Whedy	CVT00321122	CVT00321131
Belardinelli, Luiz	CVT00321132	CVT00321137
Crager, Mike	CVT00321138	CVT00321139
Karp, Carol	CVT00321140	CVT00321571
Wang, Whedy	CVT00321572	CVT00321578
Crager, Mike	CVT00321579	CVT00321642
Belardinelli, Luiz	CVT00321643	CVT00321651
Dillon, Margaret	CVT00321652	CVT00321654
Wang, Whedy	CVT00321655	CVT00321660
Crager, Mike	CVT00321661	CVT00321666
Chai, Chris	CVT00321667	CVT00321730
Wolff, Andy	CVT00321731	CVT00321742
Lange, Louis	CVT00321743	CVT00321745
Crager, Mike	CVT00321746	CVT00321747

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Karp, Carol	CVT00321748	CVT00321773
Dillon, Margaret	CVT00321774	CVT00321782
Karp, Carol	CVT00321783	CVT00321804
Belardinelli, Luiz	CVT00321805	CVT00321806
Wang, Whedy	CVT00321807	CVT00321841
Chai, Chris	CVT00321842	CVT00321865
Belardinelli, Luiz	CVT00321866	CVT00321875
Karp, Carol	CVT00321876	CVT00321879
Crager, Mike	CVT00321880	CVT00321888
Belardinelli, Luiz	CVT00321889	CVT00321932
Crager, Mike	CVT00321933	CVT00321944
Lange, Louis	CVT00321945	CVT00321958
Belardinelli, Luiz	CVT00321959	CVT00321991
Crager, Mike	CVT00321992	CVT00322000
Wang, Whedy	CVT00322001	CVT00322010
Lange, Louis	CVT00322011	CVT00322012
Crager, Mike	CVT00322013	CVT00322014
Karp, Carol	CVT00322015	CVT00322054
Dillon, Margaret	CVT00322055	CVT00322061
Karp, Carol	CVT00322062	CVT00322069
Wang, Whedy	CVT00322070	CVT00322072
Lange, Louis	CVT00322073	CVT00322073
Crager, Mike	CVT00322074	CVT00322079
Wang, Whedy	CVT00322080	CVT00322107
Crager, Mike	CVT00322108	CVT00322116
Wang, Whedy	CVT00322117	CVT00322146
Karp, Carol	CVT00322147	CVT00322161
Crager, Mike	CVT00322162	CVT00322168
Chai, Chris	CVT00322169	CVT00322173
Wolff, Andy	CVT00322174	CVT00322209
Belardinelli, Luiz	CVT00322210	CVT00322258
Karp, Carol	CVT00322259	CVT00322268
Lange, Louis	CVT00322269	CVT00322277
Wolff, Andy	CVT00322278	CVT00322282
Wang, Whedy	CVT00322283	CVT00322286
Belardinelli, Luiz	CVT00322287	CVT00322288
Crager, Mike	CVT00322289	CVT00322290
Spiegelman, Dan	CVT00322291	CVT00322296
Chai, Chris	CVT00322297	CVT00322303
Crager, Mike	CVT00322304	CVT00322305
Chai, Chris	CVT00322306	CVT00322307
Crager, Mike	CVT00322308	CVT00322314
Belardinelli, Luiz	CVT00322315	CVT00322315
Spiegelman, Dan	CVT00322316	CVT00322328
Crager, Mike	CVT00322329	CVT00322346
Wolff, Andy	CVT00322347	CVT00322705
Belardinelli, Luiz	CVT00322706	CVT00322715
Crager, Mike	CVT00322716	CVT00322723

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Lange, Louis	CVT00322724	CVT00322737
Crager, Mike	CVT00322738	CVT00322740
Chai, Chris	CVT00322741	CVT00322743
Crager, Mike	CVT00322744	CVT00322749
Belardinelli, Luiz	CVT00322750	CVT00322750
Chai, Chris	CVT00322751	CVT00322760
Karp, Carol	CVT00322761	CVT00322768
Wolff, Andy	CVT00322769	CVT00322780
Belardinelli, Luiz	CVT00322781	CVT00322792
Crager, Mike	CVT00322793	CVT00322813
Wang, Whedy	CVT00322814	CVT00322820
Crager, Mike	CVT00322821	CVT00322830
Chai, Chris	CVT00322831	CVT00322831
Wang, Whedy	CVT00322832	CVT00322836
Crager, Mike	CVT00322837	CVT00322842
Karp, Carol	CVT00322843	CVT00322848
Dillon, Margaret	CVT00322849	CVT00323127
Karp, Carol	CVT00323128	CVT00323408
Belardinelli, Luiz	CVT00323409	CVT00323416
Karp, Carol	CVT00323417	CVT00323419
Wolff, Andy	CVT00323420	CVT00323736
Belardinelli, Luiz	CVT00323737	CVT00323749
Lange, Louis	CVT00323750	CVT00323909
Wang, Whedy	CVT00323910	CVT00323913
Chai, Chris	CVT00323914	CVT00323993
Wang, Whedy	CVT00323994	CVT00324015
Belardinelli, Luiz	CVT00324016	CVT00324019
Lange, Louis	CVT00324020	CVT00324023
Wang, Whedy	CVT00324024	CVT00324042
Crager, Mike	CVT00324043	CVT00324122
Chai, Chris	CVT00324123	CVT00324144
Wang, Whedy	CVT00324145	CVT00324148
Crager, Mike	CVT00324149	CVT00324211
Chai, Chris	CVT00324212	CVT00324213
Lange, Louis	CVT00324214	CVT00324237
Crager, Mike	CVT00324238	CVT00324258
Karp, Carol	CVT00324257	CVT00324268
Lange, Louis	CVT00324269	CVT00324269
Belardinelli, Luiz	CVT00324270	CVT00325117
Lange, Louis	CVT00325118	CVT00325123
Crager, Mike	CVT00325124	CVT00325157
Dillon, Margaret	CVT00325158	CVT00325221
Belardinelli, Luiz	CVT00325222	CVT00325228
Crager, Mike	CVT00325229	CVT00325267
Chai, Chris	CVT00325268	CVT00325311
Wang, Whedy	CVT00325312	CVT00325316
Belardinelli, Luiz	CVT00325317	CVT00325374
Wang, Whedy	CVT00325375	CVT00325377

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Lange, Louis	CVT00325378	CVT00325380
Wang, Whedy	CVT00325381	CVT00325381
Wolff, Andy	CVT00325382	CVT00325384
Wang, Whedy	CVT00325385	CVT00325399
Crager, Mike	CVT00325400	CVT00325400
Chai, Chris	CVT00325401	CVT00325403
Dillon, Margaret	CVT00325404	CVT00325447
Crager, Mike	CVT00325448	CVT00325450
Chai, Chris	CVT00325451	CVT00325488
Crager, Mike	CVT00325489	CVT00325524
Chai, Chris	CVT00325525	CVT00325530
Belardinelli, Luiz	CVT00325531	CVT00325563
Wang, Whedy	CVT00325564	CVT00325569
Spiegelman, Dan	CVT00325570	CVT00325624
Crager, Mike	CVT00325625	CVT00325677
Wang, Whedy	CVT00325678	CVT00325679
Crager, Mike	CVT00325680	CVT00325680
Spiegelman, Dan	CVT00325691	CVT00325693
Lange, Louis	CVT00325694	CVT00325696
Crager, Mike	CVT00325697	CVT00325713
Wolff, Andy	CVT00325714	CVT00325714
Belardinelli, Luiz	CVT00325715	CVT00325742
Wolff, Andy	CVT00325743	CVT00325767
Belardinelli, Luiz	CVT00325768	CVT00325790
Crager, Mike	CVT00325781	CVT00325842
Wolff, Andy	CVT00325843	CVT00325878
Wang, Whedy	CVT00325879	CVT00325888
Belardinelli, Luiz	CVT00325889	CVT00325913
Wang, Whedy	CVT00325914	CVT00326072
Belardinelli, Luiz	CVT00326073	CVT00326076
Crager, Mike	CVT00326077	CVT00326084
Spiegelman, Dan	CVT00326085	CVT00326110
Karp, Carol	CVT00326111	CVT00326111
Wang, Whedy	CVT00326112	CVT00326138
Belardinelli, Luiz	CVT00326139	CVT00326185
Lange, Louis	CVT00326186	CVT00326194
Wang, Whedy	CVT00326195	CVT00326289
Wolff, Andy	CVT00326290	CVT00326299
Belardinelli, Luiz	CVT00326300	CVT00326305
Wang, Whedy	CVT00326306	CVT00326325
Belardinelli, Luiz	CVT00326326	CVT00326330
Wang, Whedy	CVT00326331	CVT00326361
Chai, Chris	CVT00326362	CVT00326377
Belardinelli, Luiz	CVT00326378	CVT00326383
Wang, Whedy	CVT00326384	CVT00326473
Belardinelli, Luiz	CVT00326474	CVT00326504
Crager, Mike	CVT00326505	CVT00326509
Wang, Whedy	CVT00326510	CVT00326512

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Spiegelman, Dan	CVT00326513	CVT00326514
Wang, Whedy	CVT00326515	CVT00326520
Belardinelli, Luiz	CVT00326521	CVT00326544
Spiegelman, Dan	CVT00326545	CVT00326548
Wang, Whedy	CVT00326549	CVT00326550
Lange, Louis	CVT00326551	CVT00326552
Wang, Whedy	CVT00326553	CVT00326558
Lange, Louis	CVT00326559	CVT00326563
Chal, Chris	CVT00326564	CVT00326603
Crager, Mike	CVT00326604	CVT00326605
Lange, Louis	CVT00326606	CVT00326638
Crager, Mike	CVT00326639	CVT00326641
Chal, Chris	CVT00326642	CVT00326693
Wang, Whedy	CVT00326694	CVT00326703
Lange, Louis	CVT00326704	CVT00326728
Chal, Chris	CVT00326729	CVT00326738
Wang, Whedy	CVT00326739	CVT00326743
Crager, Mike	CVT00326744	CVT00326749
Spiegelman, Dan	CVT00326750	CVT00326753
Wang, Whedy	CVT00326754	CVT00326759
Belardinelli, Luiz	CVT00326760	CVT00326786
Chai, Chris	CVT00326787	CVT00326788
Wang, Whedy	CVT00326789	CVT00326814
Chai, Chris	CVT00326815	CVT00326818
Wang, Whedy	CVT00326819	CVT00326820
Crager, Mike	CVT00326821	CVT00326823
Karp, Carol	CVT00326824	CVT00326825
Wang, Whedy	CVT00326826	CVT00326835
Belardinelli, Luiz	CVT00326836	CVT00326841
Crager, Mike	CVT00326842	CVT00326852
Chal, Chris	CVT00326853	CVT00326854
Wang, Whedy	CVT00326855	CVT00326857
Belardinelli, Luiz	CVT00326858	CVT00326864
Wang, Whedy	CVT00326865	CVT00326871
Belardinelli, Luiz	CVT00326872	CVT00326873
Wang, Whedy	CVT00326874	CVT00326874
Chai, Chris	CVT00326875	CVT00326953
Wang, Whedy	CVT00326954	CVT00326980
Dillon, Margaret	CVT00326981	CVT00327001
Wolff, Andy	CVT00327002	CVT00327004
Crager, Mike	CVT00327005	CVT00327007
Chai, Chris	CVT00327008	CVT00327055
Blackburn, Brent	CVT00327056	CVT00327200
Belardinelli, Luiz	CVT00327201	CVT00327255
Blackburn, Brent	CVT00327256	CVT00327309
Wang, Whedy	CVT00327310	CVT00327364
Belardinelli, Luiz	CVT00327365	CVT00327369
Spiegelman, Dan	CVT00327370	CVT00327425

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Belardinelli, Luiz	CVT00327426	CVT00327454
Wang, Whedy	CVT00327455	CVT00327474
Belardinelli, Luiz	CVT00327475	CVT00327475
Chai, Chris	CVT00327476	CVT00327478
Belardinelli, Luiz	CVT00327479	CVT00327484
Wang, Whedy	CVT00327485	CVT00327490
Crager, Mike	CVT00327491	CVT00327501
Belardinelli, Luiz	CVT00327502	CVT00327516
Chai, Chris	CVT00327517	CVT00327519
Crager, Mike	CVT00327520	CVT00327647
Belardinelli, Luiz	CVT00327648	CVT00327665
Blackburn, Brent	CVT00327666	CVT00327751
Wang, Whedy	CVT00327752	CVT00327838
Belardinelli, Luiz	CVT00327839	CVT00327841
Blackburn, Brent	CVT00327842	CVT00327898
Crager, Mike	CVT00327899	CVT00327917
Chai, Chris	CVT00327918	CVT00327924
Belardinelli, Luiz	CVT00327925	CVT00327956
Karp, Carol	CVT00327957	CVT00328107
Belardinelli, Luiz	CVT00328108	CVT00328158
Blackburn, Brent	CVT00328159	CVT00328187
Dillon, Margaret	CVT00328188	CVT00328200
Belardinelli, Luiz	CVT00328201	CVT00328248
Dillon, Margaret	CVT00328249	CVT00328249
Belardinelli, Luiz	CVT00328250	CVT00328252
Wang, Whedy	CVT00328253	CVT00328256
Belardinelli, Luiz	CVT00328257	CVT00328289
Crager, Mike	CVT00328290	CVT00328305
Belardinelli, Luiz	CVT00328306	CVT00328419
Spiegelman, Dan	CVT00328420	CVT00328509
Dillon, Margaret	CVT00328510	CVT00328513
Belardinelli, Luiz	CVT00328514	CVT00328532
Crager, Mike	CVT00328533	CVT00328534
Blackburn, Brent	CVT00328535	CVT00328583
Lange, Louis	CVT00328584	CVT00328632
Dillon, Margaret	CVT00328633	CVT00328645
Belardinelli, Luiz	CVT00328646	CVT00328647
Chai, Chris	CVT00328648	CVT00328713
Blackburn, Brent	CVT00328714	CVT00328715
Belardinelli, Luiz	CVT00328716	CVT00328716
Dillon, Margaret	CVT00328717	CVT00329029
Chai, Chris	CVT00329030	CVT00329045
Lange, Louis	CVT00329046	CVT00329047
Chai, Chris	CVT00329048	CVT00329075
Dillon, Margaret	CVT00329076	CVT00329188
Wang, Whedy	CVT00329189	CVT00329190
Blackburn, Brent	CVT00329191	CVT00329542
Lange, Louis	CVT00329543	CVT00329546

CUSTODIAN	BEG PRODUCTION NUM	END PRODUCTION NUM
Dillon, Margaret	CVT00329547	CVT00329770
Karp, Carol	CVT00329771	CVT00329774
Wolff, Andy	CVT00329775	CVT00329779
Dillon, Margaret	CVT00329780	CVT00329810
Lange, Louis	CVT00329811	CVT00329817
Dillon, Margaret	CVT00329818	CVT00329941
Crager, Mike	CVT00329942	CVT00329970
Blackburn, Brent	CVT00329971	CVT00329977

Exhibit 14

Adm

MILBANK, TWEED, HADLEY & McCLOY LLP

1 CHASE MANHATTAN PLAZA

NEW YORK, N.Y. 10005-1413

212-530-5000

FAX: 212-530-5219

Litigation

L. Anthony Pellegrino

1 Chase Manhattan Plaza

New York, NY 10005

T: 212-530-5140 F: 212-822-5140

apellegrino@milbank.com

www.milbank.com

FRANKFURT

49-68-7593-7170

FAX: 49-68-7593-8303

TOKYO

813-3504-1050

FAX: 813-3595-2790

HONG KONG

852-2971-4888

FAX: 852-2840-0782

SINGAPORE

65-6428-5400

FAX: 65-6428-2500

August 25, 2004

VIA FEDERAL EXPRESS

REC'D AUG 26 2004

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

Re: **Jaffe v. Household International, Inc. et al.**

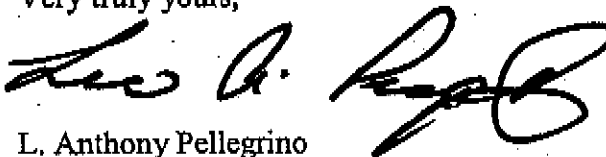
Dear Luke:

Enclosed is a replacement CD-ROM labeled HHS 01910580 to HHS 01917579.

Documents produced to the plaintiffs in this litigation have been produced as kept in the ordinary course of the Household Defendants' business except that, to the extent possible, documents have been produced to plaintiffs in electronic format.

That is all Rule 34(b) requires.

Very truly yours,



L. Anthony Pellegrino

Copies to:

Marvin A. Miller, Esq.

Lucia Nale, Esq.

Adam Deutsch, Esq.

Via Facsimile (w/o enclosure)

Via Facsimile (w/o enclosure)

Via Electronic Mail (w/o enclosure)

312-782-4485

312-701-7711

Exhibit 15

From: "Kesch, Craig" <CKesch@Cahill.com>
To: "Sylvia Sum" <SylviaS@lerachlaw.com>
Date: Mon, Mar 21, 2005 5:24 PM
Subject: RE: Household International

Dear Sylvia:

With regard to your first paragraph, your own statement reveals that my prior representation was correct. In any event, as plaintiffs well know, the Household Defendants are engaged in a rolling production of documents. To the extent that documents responsive to requests about which you inquire have not yet been produced, we anticipate that they will be produced as part of future rolling productions.

Further, we anticipate producing additional tapes to plaintiffs next week.

Finally, we apologize for the delay in connection with the redacted Vision documents and will get back to you as soon as possible.

Sincerely,
Craig

-----Original Message-----

From: Sylvia Sum [mailto:SylviaS@lerachlaw.com]
Sent: Wednesday, March 16, 2005 7:17 PM
To: Kesch, Craig
Cc: Best, Landis C.; Azra Mehdi; Luke Brooks; Monique Winkler
Subject: Household International

Craig:

I am following up on certain outstanding discovery issues.

Plaintiffs still have not received documents responsive to a number of categories in Plaintiffs' First Request for Production of Documents (i.e., Requests No. 4-5, 10, 13-14, 16-29), except for your representation that some documents responsive to some of these requests are included as part of the SEC and state investigation production. Our review of the SEC and state investigation materials contradicts your representation. For instance, plaintiffs have not received any documents regarding executive compensation, board of directors minutes or the HSBC merger agreement and disclosures relating to the merger. Furthermore, documents produced to the SEC and the states contained either little or no responsive documents regarding work performed by KPMG or Andersen. Please provide documents responsive to Requests No. 4-5, 10, 13-14, 16-29 promptly.

Also, it was unclear from your February 23, 2005 letter whether there are additional audiotapes and videotapes, or if you have already produced all responsive tapes because you have determined that the remainder of the tapes are duplicative or non-responsive. Please clarify whether there are any additional responsive tapes, and, if so, when they

will be produced.

Finally, we are still waiting for your decision as to whether you will produce complete copies of the Vision related documents identified in Monique Winkler's January 13, 2005 letter to Landis Best.

Sylvia

Sylvia Sum
Lerach Coughlin Stoia Geller Rudman & Robbins LLP
(415) 288-4545
(415) 288-4534 (fax)

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Thank you.

CC: "Best, Landis C." <LBest@Cahill.com>, "Azra Mehdi" <Azram@lerachlaw.com>, "Luke Brooks" <LukeB@lerachlaw.com>, "Monique Winkler" <MoniqueW@lerachlaw.com>

Exhibit 16



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

Sylvia Sum
sylvias@lerachlaw.com

March 30, 2005

VIA FACSIMILE

Craig Kesch, Esq.
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 Craig:

This letter responds to your letter of March 17, 2005 and your email of March 21, 2005.

Over ten months after service of lead plaintiffs' first request for production of documents, the Household Defendants have still not completed production. Your statement that you "anticipate that [the remaining responsive documents] will be produced as part of future rolling productions" is non-committal and contradicts prior representations made by the Household Defendants.

Despite representations by Landis that at least the paper production would be completed by March 31, 2005, it is apparent that this is not the case. Indeed, the Household Defendants have failed to even confirm that production of any of plaintiffs' requests is complete. This letter serves as notice that lead plaintiffs intend to move to compel production of categories of documents not produced.

Per your email of March 21, 2004, plaintiffs expect to receive additional tapes this week. Your prior correspondence is not clear whether the additional production of tapes relates to new tapes found or whether it relates to the remainder of the 50 videotapes and 25 audiotapes mentioned in your November 24, 2004 letter. If these tapes were available for our review on November 24, 2004, it is shocking that it has taken the Household Defendants four months to produce them to plaintiffs.

With respect to documents from the SEC production requested in native format, plaintiffs have carefully chosen 1409 documents from the tens of thousands of unusable and unreadable documents. Plaintiffs are willing to defer their request until the Household



Craig Kesch
March 30, 2005
Page 2

Defendants produce responsive documents in native format. Plaintiffs will revisit this issue should the production be unsatisfactory.

Lastly, your latest production, HHS 02799441-02839279, received by plaintiffs on March 23, 2005, contained documents purportedly responsive to five of plaintiffs' requests, but did not delineate which documents were responsive to which request. Since these documents were collected to respond to specific requests and have not been produced in the ordinary course of business, the Household Defendants have an obligation to organize and label them to correspond with the categories in the request. See Fed. R. Civ. P. 34. Please provide the Bates ranges corresponding to the production for each request. Also, for future productions, if the Household Defendants decide to bunch together various requests, please give the Bates-ranges for the documents responsive to specific requests.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sylvia Sum", written over a horizontal line.

Sylvia Sum

SS:jc

cc: Marvin A. Miller, Esq.
Adam Deutsch, Esq.

T:\Cases\SP\Household Int'l\Corres\LTR Kesch 03-30-05.doc