

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

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**DECLARATION OF AZRA Z. MEHDI IN SUPPORT OF LEAD PLAINTIFFS'
RENEWED MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO
PRODUCE ELECTRONIC EVIDENCE IN NATIVE ELECTRONIC FORMAT**

I, AZRA Z. MEHDI, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the States of New York and California. I am a member with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, lead counsel of record for lead plaintiff and the Class in the above-entitled action. I am also admitted to the General Bar for the United States District Court for the Northern District of Illinois. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

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

- Exhibit 1: Lead Plaintiffs' Motion to Compel the Household Defendants to Produce Electronic Evidence in Native Electronic Format, filed June 6, 2005;
- Exhibit 2: Excerpts of August 24, 2005 Hearing Transcript;
- Exhibit 3: Lead Plaintiffs' Reply in Support of Motion to Compel Household Defendants to Produce Electronic Evidence in Native Electronic Format, filed July 21, 2005;
- Exhibit 4: December 30, 2004 letter from Azra Z. Mehdi to Landis Best;
- Exhibit 5: January 11, 2005 letter from Landis C. Best to Azra Mehdi with initial protocol;
- Exhibit 6: Excerpts of Plaintiffs' First Request for Production of Documents to Household Defendants, dated May 17, 2004 (definition of relevant period);
- Exhibit 7: Excerpts of Plaintiffs' Second Request for Production of Documents to Household Defendants, dated April 8, 2005 (definition of relevant period);
- Exhibit 8: January 13, 2005 letter from Azra Z. Mehdi to Landis Best;
- Exhibit 9: September 29, 2005 letter from Joshua M. Newville to Azra Z. Mehdi regarding e-production;
- Exhibit 10: October 3, 2005 letter from Azra Z. Mehdi to Judge Nan R. Nolan;
- Exhibit 11: October 4, 2005 letter from Landis C. Best to Judge Nan R. Nolan; and
- Exhibit 12: October 11, 2005 letter from Azra Z. Mehdi to Judge Nan R. Nolan.

DECLARATION OF SERVICE BY UPS OVERNIGHT AND BY EMAIL

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 October 11, 2005, declarant served by UPS Overnight (with exhibits) and by email (without exhibits) the **DECLARATION OF AZRA Z. MEHDI IN SUPPORT OF LEAD PLAINTIFFS' RENEWED MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO PRODUCE ELECTRONIC EVIDENCE IN NATIVE ELECTRONIC FORMAT** to the parties listed on the attached Service List. The parties' email addresses are as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th day of October, 2005, at San Francisco, California.

/S/ Monina O. Gamboa

MONINA O. GAMBOA

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 10/11/2005 (02-0377)

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HOUSEHOLD INTERNATIONAL (LEAD)

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