

**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 BING Z. RYAN IN SUPPORT OF THE CLASS' MOTION FOR AN
ORDER PERMITTING THE USE OF DOCUMENTS RECALLED BY DEFENDANTS
AS "INADVERTENTLY" PRODUCED**

REDACTED VERSION

I, BING Z. RYAN, 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. Attached are true and correct copies of the following exhibits:

- Exhibit 1: List of documents recalled by defendants;
- Exhibit 2: Letter from Samantha K. Sherman to Azra Z. Mehdi dated March 21, 2006;
- Exhibit 3: Letter from Peter Hawkes to Azra Z. Mehdi dated April 20, 2006;
- Exhibit 4: Letter from Amy Barabas to Azra Z. Mehdi dated May 11, 2006;
- Exhibit 5: Letter from Sylvia Sum to Samantha Sherman dated May 4, 2006;
- Exhibit 6: Letter from Sylvia Sum to Peter Hawkes dated May 12, 2006;
- Exhibit 7: Letter from Luke O. Brooks to Janet Beer dated May 10, 2006;
- Exhibit 8: Letter from Amy Barabas to Luke O. Brooks dated May 22, 2006;
- Exhibit 9: Letter from Samantha Sherman to Sylvia Sum dated May 31, 2006;
- Exhibit 10: Letter from Luke O. Brooks to Samantha Sherman dated June 8, 2006;
- Exhibit 11: Letter from Samantha Sherman to Luke O. Brooks dated June 13, 2006;
- Exhibit 12: Letter from Samantha Sherman to Luke O. Brooks dated July 31, 2006;
- Exhibit 13: Letter from Samantha Sherman to Luke O. Brooks, dated September 1, 2006 with fax transmittal sheet;
- Exhibit 14: Letter from Peter Hawkes to Sylvia Sum dated May 25, 2006;
- Exhibit 15: Letter from Luke O. Brooks to Samantha Sherman dated July 14, 2006;
- Exhibit 16: Letter from Luke O. Brooks to Samantha Sherman dated August 22, 2006;
- Exhibit 17: Documents produced by defendants, Bates Nos. HHS 03357762 through HHS 03357766;

- Exhibit 18: Documents produced by defendants, Bates Nos. HHS-ED 484832 through HHS-ED 484834;
- Exhibit 19: Documents produced by defendants, Bates Nos. HHS-ED 491162 through HHS-ED 491165;
- Exhibit 20: Documents produced by defendants, Bates Nos. HHS-ED 492296 through HHS-ED 492305;
- Exhibit 21: Documents produced by defendants, Bates Nos. HHS-ED 492322;
- Exhibit 22: Documents produced by defendants, Bates Nos. HHS-E 0037552.0001, 0037553.0001, 0037553.0002;
- Exhibit 23: Documents produced by defendants, Bates Nos. HHS-E 0037600.0001, HHS-E 0037601.0001, HHS-E 0037602.0001;
- Exhibit 24: Documents produced by defendants, Bates Nos. HHS-E 0037554.0001;
- Exhibit 25: Email from Ira Embrown to Luke O. Brooks dated December 6, 2006;
- Exhibit 26: Plaintiffs' First Request for Production of Documents to Household; Defendants;
- Exhibit 27: Letter from Jason Hall to Azra Z. Mehdi dated August 22, 2006;
- Exhibit 28: Letter from Jason Hall to Azra Z. Mehdi dated August 31, 2006;
- Exhibit 29: Letter from Jason Hall to Azra Z. Mehdi dated September 7, 2006;
- Exhibit 30: Letter from Jason Hall to Azra Z. Mehdi dated September 8, 2006;
- Exhibit 31: Letter from Jason Hall to Azra Z. Mehdi dated September 11, 2006;
- Exhibit 32: Letter from Jason Hall to Azra Z. Mehdi dated September 14, 2006;
- Exhibit 33: Letter from Jason Hall to Azra Z. Mehdi dated September 21, 2006;
- Exhibit 34: Letter from Jason Hall to Azra Z. Mehdi dated October 3, 2006;
- Exhibit 35: Letter from Jason Hall to Azra Z. Mehdi dated October 18, 2006; and
- Exhibit 36: Letter from Jason Hall to Azra Z. Mehdi dated October 27, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 6th day of December, 2006, at San Francisco, California.

s/ Bing Z. Ryan

BING Z. RYAN

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