



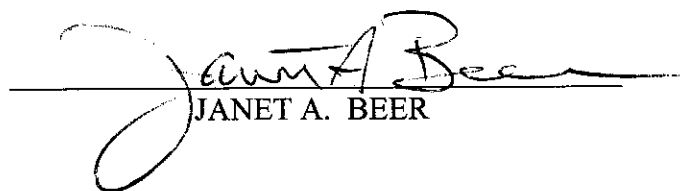
I, Janet A. Beer, declare as follows:

1. I am a member of the bar of the State of New York, admitted to this Court *pro hac vice* in connection with the above-captioned matter, and an attorney associated with the firm Cahill Gordon & Reindel LLP, co-counsel for defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar in this action. I submit this declaration to place before the Court certain documents referenced in Plaintiffs' motion papers and the Household Defendants' Memorandum of Law in Opposition to Lead Plaintiffs' Motion for an Order Permitting the Use of Documents Recalled by Defendants as Inadvertently Produced.
2. Although Plaintiffs provided a set of the eight subject documents for *in camera* review by the Court, they failed to mark the handful of redactions that they contest on the first five documents. (The last three documents were recalled in their entirety). Accordingly, another set of the first five documents is annexed hereto, with the portions of the documents that Defendants recalled marked for the Court by means of dark borders.
3. The redactions shown in grey on these e-mails were made in connection with the original production, and because they mask certain direct communications between Household employees and one or more in-house attorneys for the Company, we do not understand Plaintiffs to be challenging them on this motion or otherwise.

- 3 -

4. Attached hereto as Exhibit 1 is copy of HHS 03357762-66, marked to show the contested redactions.
5. Attached hereto as Exhibit 2 is a copy of HHS-ED 484832-34, marked to show the contested redactions.
6. Attached hereto as Exhibit 3 is a copy of HHS-ED 491162-65, marked to show the contested redaction.
7. Attached hereto as Exhibit 4 is a copy of HHS-ED 492296-305, marked to show the contested redactions.
8. Attached hereto as Exhibit 5 is a copy of HHS-ED 492322-331, marked to show the contested redactions.

Executed this 13<sup>th</sup> Day of December, 2006 in New York, New York.

  
JANET A. BEER

**RESTRICTED DOCUMENTS  
FILED UNDER SEAL**

**EXHIBITS 1-5**