

**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' REPLY IN
SUPPORT OF MOTION FOR AN ORDER PERMITTING THE USE OF DOCUMENTS
RECALLED BY DEFENDANTS AS "INADVERTENTLY" PRODUCED**

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 and am admitted to the General Bar of the United States District Court in the Northern District of Illinois. 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 A: Letter from Kim A. Smith to Azra Z. Mehdi, dated December 7, 2006;

Exhibit B: Letter from Peter Hawkes to Azra Z. Mehdi, dated December 16, 2006; and

Exhibit C: Letter from Peter Hawkes to Azra Z. Mehdi, dated December 19, 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 19th day of December, 2006, at San Francisco, California.

s/ Bing Z. Ryan

BING Z. RYAN

DECLARATION OF SERVICE BY EMAIL AND BY U.S. MAIL

I, the undersigned, declare:

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

2. That on December 19, 2006, declarant served by electronic mail and by U.S. Mail to the parties the: **DECLARATION OF BING Z. RYAN IN SUPPORT OF THE CLASS' REPLY IN SUPPORT OF MOTION FOR AN ORDER PERMITTING THE USE OF DOCUMENTS RECALLED BY DEFENDANTS AS "INADVERTENTLY" PRODUCED.** The parties' email addresses are as follows:

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and by U.S. Mail to:

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Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th day of December, 2006, at San Francisco, California.

s/ Marcy Medeiros

MARCY MEDEIROS