



Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, the “Household Defendants”) respectfully request that this Court allow them to file (i) the attached memorandum in opposition to the “Supplemental Declaration of Azra Z. Mehdi in Support of the Class’ Objection to the Magistrate’s Order Regarding the Application of the Work-Product Doctrine to Audit Letters and Related Documents Based Upon the December 7, 2006 Testimony of Kenneth H. Robin” (the “Mehdi Declaration”); and (ii) the Declaration of Janet A. Beer in support thereof.

1. On December 11, 2006, Plaintiffs filed a “Motion for Leave to File Supplemental Declaration of Azra Z. Mehdi in Support of the Class’ Objection to the Magistrate’s July 6, 2006 Order Regarding the Application of the Work-Product Doctrine to Audit Letters and Related Documents Based Upon the December 7, 2006 Testimony of Kenneth H. Robin” (the “Mehdi Declaration”). Plaintiffs sought to place before the Court four additional documents in support of their Objection to the Magistrate’s Order Regarding the Application of the Work-Product Doctrine to Audit Letters and Related Documents.
2. On December 13, 2006, this Court granted Plaintiffs’ Motion for Leave to File.
3. The Household Defendants now seek leave to file a brief response to the Mehdi Declaration so that the Court has before it the context and information necessary to consider the Mehdi Declaration and the documents attached thereto. As the attached response and declaration demonstrate, the additional documents and arguments set forth by Plaintiffs do not change the analysis or result of Magistrate Judge Nolan’s July 6, 2006 Order.
4. Pursuant to the October 10, 2006 Minute Order entered by Magistrate Judge Nolan “instructing the clerk’s office to accept all filings under seal in this matter, where the documents have been designated as confidential pursuant to the November 5, 2004 Protective Order,” the Household Defendants do not separately move pursuant to Local Rule 26.2 for leave to file the attached response and declaration as a restricted document. Redacted copies of the memorandum and declaration are also submitted herewith to be filed in the public file.

WHEREFORE, the Household Defendants respectfully request that they be permitted to file the attached memorandum and declaration.

