

**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 THE CLASS' RESPONSE TO  
DEFENDANTS' MOTION FOR SANCTIONS AND TO COMPEL RESPONSES TO  
"ADDITIONAL" INTERROGATORIES ALLOWED  
BY THE COURT'S AUGUST 10 ORDER**

**REDACTED VERSION**

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, and the District Court for the Northern District Court of Illinois. I am a member of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, counsel of record for the Lead Plaintiffs and Lead Counsel on behalf of the certified Class 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: Lead Plaintiffs Amended Responses and Objections to Household Defendants' [Sixth] Set of Interrogatories to Plaintiffs, served on December 14, 2006;
- Exhibit 2: Meet and Confer Transcript of November 10, 2006;
- Exhibit 3: Branch Profitability Report Reference Guide between the dates of March 17 and March 18, 1999 (Bates Nos. HHS 02892593 – HHS 02892602);
- Exhibit 4: Memo from Rich Kolb to Joe Vozar, dated October 12, 2000 regarding September 2000 Results (Bates Nos. HHS 03069474 – HHS 03069482);
- Exhibit 5: Exhibit 123 to Walter Ryback's Deposition taken on February 24, 2006 (Bates Nos. HHS 02819552 – HHS 02819561);
- Exhibit 6: Bates Nos. Bates Nos. HHS 00284117 - HHS 00284119;
- Exhibit 7: Exhibit 17 to Carin Rodemoyer's Deposition taken on June 27, 2006 (Bates Nos. HHS 03070933 – HHS 03070938);
- Exhibit 8: E-mail from Cameron Baker to David Owen, dated December 1, 2006; and
- Exhibit 9: E-mail exchange between Cameron Baker and David Owen and other counsel, dated December 1 and 4, 2006.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 29th day of December, 2006, at Wellington, Florida.

s/ Azra Z. Mehdi  
\_\_\_\_\_  
AZRA Z. MEHDI

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 29, 2006, declarant served by electronic mail and by U.S. Mail to the parties the: **DECLARATION OF AZRA Z. MEHDI IN SUPPORT OF THE CLASS' RESPONSE TO DEFENDANTS' MOTION FOR SANCTIONS AND TO COMPEL RESPONSES TO "ADDITIONAL" INTERROGATORIES ALLOWED BY THE COURT'S AUGUST 10 ORDER.** The parties' email addresses are as follows:

<a href="mailto:TKavaler@cahill.com">TKavaler@cahill.com</a> <a href="mailto:PSloane@cahill.com">PSloane@cahill.com</a> <a href="mailto:PFarren@cahill.com">PFarren@cahill.com</a> <a href="mailto:LBest@cahill.com">LBest@cahill.com</a> <a href="mailto:DOwen@cahill.com">DOwen@cahill.com</a>	<a href="mailto:NEimer@EimerStahl.com">NEimer@EimerStahl.com</a> <a href="mailto:ADeutsch@EimerStahl.com">ADeutsch@EimerStahl.com</a> <a href="mailto:MMiller@millerfaucher.com">MMiller@millerfaucher.com</a> <a href="mailto:LFanning@millerfaucher.com">LFanning@millerfaucher.com</a>
--	--

and by U.S. Mail to:

Lawrence G. Soicher, Esq.  
Law Offices of Lawrence G. Soicher  
110 East 59th Street, 25th Floor  
New York, NY 10022

David R. Scott, Esq.  
Scott & Scott LLC  
108 Norwich Avenue  
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 29th day of December, 2006, at San Francisco, California.

s/ Monina O. Gamboa  
\_\_\_\_\_  
MONINA O. GAMBOA