

**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 TO
COMPEL HOUSEHOLD DEFENDANTS TO PRODUCE MISSING DOCUMENTS,
DOCUMENTS IMPROPERLY WITHHELD OR REDACTED AND FOR A FINDING
OF WAIVER DUE TO DEFENDANTS' FAILURE TO ASSERT PRIVILEGE OVER
WITHHELD OR REDACTED DOCUMENTS THAT ARE NOT ON THEIR PRIVILEGE
LOGS**

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 the District Court for the Northern District of Illinois. I am associated with 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: Withheld or Redacted Documents that Do Not Appear on Defendants' Privilege Logs;
- Exhibit 2: Withheld or Redacted Documents that Are Belatedly Included in Defendants' Fourteenth and Fifteenth Privilege Logs;
- Exhibit 3: Documents Withheld or Redacted Due to Non-responsiveness;
- Exhibit 4: Missing Documents;
- Exhibit 5: Withheld or Redacted Documents Claimed by Defendants as Produced that the Class Requests More Information;
- Exhibit 6: Letter from Landis Best to Azra Mehdi dated December 7, 2006;
- Exhibit 7: E-mail from Craig Kesch to Bing Ryan dated December 11, 2006;
- Exhibit 8: E-mail from Craig Kesch to Bing Ryan dated December 12, 2006;
- Exhibit 9: Letter from Bing Ryan to Samantha Sherman dated October 20, 2006;
- Exhibit 10: List of Withheld or Redacted Documents That Do Not Appear On Defendants' Privilege Log, attached to Bing Ryan's October 20, 2006 letter;
- Exhibit 11: E-mail from Bing Ryan to Ira Dembrow dated December 4, 2006 at 10:34 A.M. with attached List of Withheld Documents That Do Not Appear On Defendants' Privilege Log;
- Exhibit 12: String of e-mails between Craig Kesch and Bing Ryan dated December 11-15, 2006;
- Exhibit 13: Letter from Bing Ryan to Peter Hawkes dated September 22, 2006;

- Exhibit 14: Letter from Bing Ryan to Samantha Sherman dated October 25, 2006;
- Exhibit 15: Letter from Samantha Sherman to Bing Ryan dated October 24, 2006;
- Exhibit 16: Letter from Samantha Sherman to Bing Ryan dated October 27, 2006;
- Exhibit 17: November 30, 2006 Hearing Transcript excerpt;
- Exhibit 18: E-mail from Peter Hawkes to Azra Mehdi and Bing Ryan dated December 1, 2006;
- Exhibit 19: E-mail from Bing Ryan to Ira Dembrow dated December 4, 2006 at 7:11 P.M. with attached List of Redacted Documents That Do Not Appear On Defendants' Privilege Log;
- Exhibit 20: String of e-mails between Ira Dembrow and Bing Ryan dated December 4-5, 2006;
- Exhibit 21: E-mail from Amy Barabas to Luke Brooks dated December 5, 2006;
- Exhibit 22: Letter from Craig Kesch to Azra Mehdi dated September 30, 2005;
- Exhibit 23: Letter from Craig Kesch to Azra Mehdi dated October 4, 2005;
- Exhibit 24: E-mail from Ira Dembrow to Luke Brooks and Bing Ryan dated December 7, 2006;
- Exhibit 25: E-mail from Luke Brooks to Ira Dembrow and Bing Ryan dated December 7, 2006 with attached redline versions of the Withheld and Redacted Lists of Documents;
- Exhibit 26: E-mail from Ira Dembrow to Luke Brooks and Bing Ryan dated December 14, 2006;
- Exhibit 27: December 15, 2006 Minute Order;
- Exhibit 28: E-mail from Peter Hawkes to Azra Mehdi and Bing Ryan dated December 19, 2006;
- Exhibit 29: Letter from Ira Dembrow to Luke Brooks dated January 3, 2007;
- Exhibit 30: E-mail from Luke Brooks to Ira Dembrow dated January 3, 2007;
- Exhibit 31: E-mail from Peter Hawkes to Luke Brooks dated January 3, 2007 with attached revised Lists of Redacted Documents and Withheld Documents That Allegedly Do Not Appear On Defendants' Privilege Log;
- Exhibit 32: Letter from Bing Ryan to Landis Best dated November 22, 2006 with attached gap report;

- Exhibit 33: Letter from Bing Ryan to Landis Best dated December 11, 2006;
- Exhibit 34: December 15, 2006 Hearing Transcript excerpt;
- Exhibit 35: Order dated December 19, 2006 in the matter styled *In re Oracle Corporation Securities Litigation*; and
- Exhibit 36: Example of skip sheet produced by defendants.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 8th day of January, 2007, at San Francisco, California.

s/ Bing Z. Ryan

BING Z. RYAN

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