

**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. )	
_____ )	

**REPLY DECLARATION OF AZRA Z. MEHDI IN FURTHER SUPPORT OF THE  
CLASS' MOTION TO COMPEL ANDREW KAHR DOCUMENTS IMPROPERLY  
WITHHELD AS PRIVILEGED OR DESTROYED BY THE HOUSEHOLD  
DEFENDANTS**

**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 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: Excerpts of the deposition transcript of Thomas Detelich dated December 22, 2006;

Exhibit 2: Exhibit 36 to the deposition transcript of Kenneth Robin dated December 7, 2006; and

Exhibit 3: Documents produced by defendants on January 23, 2007, Bates Nos. HHS 03479577 through HHS 03479602, purporting to represent compensation paid to Andrew Kahr.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 24th day of January, 2007, at San Francisco, California.

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 January 24, 2007, declarant served by electronic mail and by U.S. Mail to the parties the: **REPLY DECLARATION OF AZRA Z. MEHDI IN FURTHER SUPPORT OF THE CLASS' MOTION TO COMPEL ANDREW KAHR DOCUMENTS IMPROPERLY WITHHELD AS PRIVILEGED OR DESTROYED BY THE HOUSEHOLD DEFENDANTS (redacted version)**. 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@MillerLawLLC.com">MMiller@MillerLawLLC.com</a> <a href="mailto:LFanning@MillerLawLLC.com">LFanning@MillerLawLLC.com</a>
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.  
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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 24th day of January, 2007, at San Francisco, California.

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