

**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' MOTION FOR
RECONSIDERATION OF THE COURT'S JANUARY 24, 2007 ORDER FINDING
WAIVER OF KPMG DOCUMENTS, BUT PRECLUDING DISCLOSURE FOR
FAILURE TO DEMONSTRATE PREJUDICE**

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 State of California. I am a member of 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 Kenneth H. Robin of Household to David J. Butler of KPMG, dated January 14, 2002, Bates Nos. HI KPMG 007007-46;
- Exhibit B: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated July 17, 2002, Bates Nos. HI KPMG 017298-304;
- Exhibit C: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated April 11, 2002, Bates Nos. HI KPMG 020005-09;
- Exhibit D: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated August 26, 2002, Bates Nos. HI KPMG 017311-17;
- Exhibit E: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated October 16, 2002, Bates Nos. HI KPMG 017305-09;
- Exhibit F: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated November 18, 2002, Bates Nos. HI KPMG 017318-19;
- Exhibit G: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated December 16, 2002, Bates Nos. HI KPMG 017320-25;
- Exhibit H: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated January 13, 2003, Bates Nos. HI KPMG 017186-207; and
- Exhibit I: Letter from Kenneth H. Robin of Household to David J. Butler of KPMG, dated January 30, 2003, Bates Nos. HI KPMG 017274-75.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7th day of February, 2007, at San Francisco, California.

s/ Azra Z. Mehdi

AZRA Z. MEHDI