

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,)
on Behalf of Itself and All Others Similarly)
Situated,)
Plaintiff,)

Case No. 02 C 5893

Judge Jorge L. Alonso

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)
Defendants.)

**MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION *IN LIMINE* NO. 1
TO EXCLUDE EVIDENCE NOT RELEVANT TO CAUSATION OR INFLATION**

Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz, and Gary Gilmer respectfully submit this memorandum of law in support of their motion *in limine* to exclude evidence that is not relevant to causation or inflation but instead is relevant, if at all, only to issues that have already been resolved in this case.

INTRODUCTION

Despite the fact that this trial concerns only two narrow issues—loss causation and inflation—Plaintiffs have indicated that they intend to introduce evidence that, if it was ever relevant, was relevant only to elements that have already been resolved and will not be before this jury. Wide swaths of Plaintiffs’ proposed exhibits and witness testimony—in particular, the nine categories of evidence described below—are, at best, relevant only to proving scienter or the existence of material misstatements, elements that are no longer at issue in this case. Tellingly, Plaintiffs’ loss causation expert, Professor Daniel Fischel, does not even cite the majority of this evidence in any of his six expert reports, which is compelling proof that the evidence is not remotely relevant to proving causation or inflation. The Court should exclude such evidence because it is irrelevant, is unfairly prejudicial, is a waste of time, and confuses the issues. *See* Fed. R. Evid. 401-403.

BACKGROUND

Plaintiffs have alleged that Defendants made false statements to purchasers of Household stock, in violation of Section 10(b) of the Securities Exchange Act and Rule 10b-5. The elements of a claim for violation of Section 10(b) and Rule 10b-5 are “(1) a material misrepresentation or omission by the defendants; (2) scienter; (3) a connection between the misrepresentation or omission and the purchase or sale of a security; (4) reliance upon the misrepresentation or omission; (5) economic loss; and (6) loss causation.” *Glickenhau & Co. v.*

Household Int'l, Inc., 787 F.3d 408, 414 (7th Cir. 2015) (quoting *Halliburton Co. v. Erica P. John Fund, Inc.*, 134 S. Ct. 2398, 2407 (2014)).

The case was tried to a jury in 2009. The parties stipulated that the alleged misstatements were “in connection with” the purchase or sale of securities, *see* Dkt. No. 1545, Ex. A at 3 (Statement of Uncontested Facts), and Defendants did not contest the presumption of reliance, *see id.*, Ex. B-2 at 2 (Defendants’ Statement of Contested Issues). The jury found that Plaintiffs had proven the remaining elements of their claim with respect to 17 of the 40 alleged misstatements. Dkt. No. 1611 (Verdict).

On appeal, the Seventh Circuit reversed and remanded for a new trial. The court held that Plaintiffs had not proven loss causation and that the jury had been incorrectly instructed on what it means to “make” a false statement; the court limited the new trial to those issues. *Glickenhau*s, 787 F.3d at 433. As the Seventh Circuit noted, Defendants did not challenge the jury’s misrepresentation findings, “so the 17 actionable false statements are fixed”—Defendants “may not relitigate” whether those statements were “false or material,” and Plaintiffs may not relitigate “the other 23 statements” that the jury rejected. *Id.* at 424, 429.

On remand to this Court, the parties reached a stipulation resolving (1) which misstatements were “made” by which Defendants in light of the Seventh Circuit’s ruling, and (2) the level of scienter with which each statement was made. Dkt. 2122.

As a result, the only elements of Plaintiffs’ claim that remain to be determined at the new trial are (1) loss causation and (2) economic loss, *i.e.*, “the amount of inflation caused by each of the 17 misrepresentations at issue.” Dkt. 2042 at 1 (Order). The parties agree that the issues to “be retried are limited in scope.” Dkt. 2035 at 12 (Joint Status Report). For purposes of

apportioning damages, the jury will also be asked to allocate responsibility, on a percentage basis, between the four Defendants. *Glickenhau*s, 787 F.3d at 429.

ARGUMENT

Evidence is relevant only if it has a tendency to make a fact “of consequence in determining the action” more or less probable than it would be without the evidence. Fed. R. Evid. 401. Because only loss causation and inflation are at issue in this trial, only evidence relevant to proving or disproving those elements should be admitted. *See* Fed. R. Evid. 402. Evidence tending to show that Defendants acted with a particular state of mind, that particular statements were false, or that particular misstatements were material is not relevant to establishing facts of consequence to the issues remaining in this action; such evidence therefore should be excluded. *See, e.g., Pescatore v. Pan Am. World Airways, Inc.*, 97 F.3d 1, 16 (2d Cir. 1996) (holding that, where “liability for willful misconduct was no longer at issue,” evidence relevant to that issue should not be admitted at second phase of trial); *James River Ins. Co. v. Rapid Funding LLC*, No. 07-cv-1146, 2012 WL 1931552, at *5 (D. Colo. 2012) (holding information about previous trial irrelevant and inadmissible because it did not bear on the only issue to be retried); *cf. Children’s Broad. Corp. v. Walt Disney Co.*, No. 96-cv-907, 2002 WL 1858759, at *5 (D. Minn. Aug. 12, 2002) (holding that finding of material breach was correctly excluded from damages retrial because materiality was relevant only to the right to suspend performance, which was no longer at issue).

In particular, none of the evidence in the nine categories described below (and listed more specifically in the attached appendix) is relevant to proving loss causation or inflation. Indeed, Plaintiffs have all but admitted that most of this evidence—particularly nonpublic documents and information—is irrelevant to the two issues to be decided at this trial, because

their loss causation expert, Professor Fischel, does not rely on such evidence in his expert reports.

To the extent that the jury requires some context to resolve the remaining disputed issues, this can and should be provided through stipulations, the Court's description of the case, or other similarly efficient and nonprejudicial means. That streamlined approach is favored by the Seventh Circuit in cases like this involving a partial new trial on remand. *See MCI Commc'ns Corp. v. AT&T Co.*, 708 F.2d 1081, 1168 (7th Cir. 1983) (urging that "stipulations be heavily relied upon" on remand for a new trial solely on damages in order "to educate the fact finder" yet avoid introducing evidence "associated with a determination of liability").

Moreover, even if evidence unrelated to loss causation and damages, including the nine categories of evidence described below, was in any way relevant to this partial retrial, it should be excluded because the evidence presents a danger of unfair prejudice, confusion of the issues, and waste of time that substantially outweighs its probative value. *See Fed. R. Evid. 403.* The probative value, if any, of this evidence to the narrow questions before the second jury is miniscule. But its prejudicial nature and potential for confusing the jury about the proper grounds for the jury's decision are significant. Indeed, the very purpose of introducing most of this evidence appears to be to prejudice the jury against Defendants so that the jury renders a verdict based not on whether Plaintiffs have proven loss causation and inflation but based instead on outrage at the (already decided) fact that Defendants made material misrepresentations with scienter. This point is highlighted by the fact that Plaintiffs seek to introduce certain categories of evidence that were excluded in the first trial, in which falsity and scienter were at issue. Furthermore, there can be no dispute that admitting evidence not strictly limited to proving causation and inflation would bloat what would otherwise be a trim and focused trial. If these

categories of evidence are admitted, Defendants will be forced to respond with their own evidence, which would expend more time and further confuse the jury about what is actually at issue in this trial.¹ Plaintiffs' pretrial submissions illustrate the point, requesting that this "limited" retrial take 12 to 15 Court days. *See* [Proposed] Final Pretrial Order ¶ 3. The Court should exclude the evidence and prevent Plaintiffs from wasting the jury's, the Court's, and Defendants' time replaying evidence that is primarily relevant, if at all, to elements that are no longer in dispute. The following nine categories illustrate the type of evidence unrelated to loss causation and damages that Plaintiffs are seeking to introduce.

A. Evidence Related to Consultant Andrew Kahr

Plaintiffs seek to introduce internal memoranda authored by consultant Andrew Kahr (P0533; P0835), internal documents about his work for Household (P0347; P0348; P0349; P1006; P1007; P1026), and news reports about his work with an entirely different company (P1388). Household retained Kahr in 1998 to generate ideas to facilitate growth and maximize value; in that role, he circulated memoranda outlining sometimes controversial ideas. Plaintiffs seek to introduce the more inflammatory of Kahr's memoranda, apparently to argue (as they did in the first trial) that Household implemented Kahr's ideas and therefore emphasized developing "predatory" products. Plaintiffs also seek to introduce documents suggesting that Household eventually destroyed memoranda and emails from Kahr, apparently to argue (as they did in the first trial) that Defendants acted with a culpable state of mind. Defendants moved to exclude from the first trial memoranda and testimony relating to Kahr. The Court denied that motion on

¹ If Plaintiffs' evidence not relevant to causation or inflation is excluded, Defendants do not intend to use 103 of the exhibits currently included on their exhibit list. *See* [Proposed] Final Pretrial Order Ex. C-2.

the ground that “Kahr’s suggested methodologies are evidence from which a reasonable jury could infer Household’s intent to engage in predatory lending.” Dkt. 1516 at 11.

At the new trial, however, Defendants’ intent is not at issue, nor is the question whether Household engaged in predatory lending. It has been established by the first jury and the parties’ stipulation that Defendants recklessly made misstatements and omissions regarding predatory lending and that Household and Aldinger made one such misstatement knowingly. There is nothing on that score for this jury to determine. And the evidence about Kahr, which is either purely internal to Household or about entirely different companies, bears no relation to proving loss causation or inflation. The evidence is therefore irrelevant. It is also unfairly prejudicial and will confuse the jury about what it is actually being asked to decide in this trial. The Court should exclude the evidence related to Kahr.

B. Unapproved “Training” Video

Plaintiffs seek to introduce a two-hour unapproved and homemade “training” video created by former Household employee Dennis Hueman (P1383), as well as internal Household communications regarding that video (P0908). In the video, Hueman describes various loan solicitation techniques using inappropriate language such as “trapping the customer” and “get[ting] customers to swallow the bait [so sales staff can] slowly reel them in.” Defendants moved to exclude this inflammatory video from the first trial, but the district court denied the motion on the ground that evidence about the video was “probative as to the scienter element of the securities fraud claim.” Dkt. 1516 at 9. Plaintiffs used the video at the first trial to argue that Household trained employees to engage in predatory lending and that Defendants acted with scienter because they were aware of the video.

At the new trial, however, neither scienter nor the existence of predatory lending is at issue. The Hueman video, which was internal to Household, has no bearing on the only

questions before this jury, loss causation and inflation. The evidence is irrelevant and highly prejudicial. The video (and the necessary response from Defendants) would also confuse the jury about the issues being tried and waste time that should be spent on the elements the jury will actually be asked to decide. The Court should exclude the Hueman video and any derivative transcript, images, or soundtrack.

C. Evidence Regarding the Compensation or Stock Transactions of Defendants Aldinger, Schoenholz, and Gilmer

Plaintiffs have indicated that they intend to introduce evidence of the compensation and stock transactions of Defendants Aldinger, Schoenholz, and Gilmer, all former Household executives (D0758; D0759; D0763, D0774; D0775; D0796; D0797; P0772; P0773; P0774; P0776; P1038; P1476). The Court should exclude such evidence because it has no relevance to loss causation or inflation, the only two issues remaining in the case. Although compensation and stock transactions may have been relevant to the individual Defendants' scienter and motive, their scienter and liability for making misrepresentations has now been conclusively established by the first jury's findings and the parties' stipulation. Moreover, certain of Plaintiffs' proposed evidence relates to the individual Defendants' compensation and stock transactions *before* the Class Period. *See* D0758; D0759; D0774; P0776. The only reason for Plaintiffs to introduce such evidence in the partial retrial would be for the improper purpose of biasing the jury against Defendants. The Court should exclude the evidence because it is irrelevant and prejudicial.

D. Evidence Regarding Household's Post-Class-Period Amendment of Its 2001 Form 10-K

Pursuant to the SEC consent decree, after the class period Household amended its 2001 Form 10-K (P1267). Household did not restate its financials, but it amended certain language about its re-aging policies. Defendants moved to exclude this document in the first trial as unfairly prejudicial and as evidence of a subsequent remedial measure. Dkt. 1516 at 3. The

district court held that the amendment was “relevant to proving whether there was a misstatement in the original financial statement and whether the misstatement was material” and that its probative value for that purpose was “not substantially outweighed by the danger of unfair prejudice.” *Id.* at 3-4.

At the new trial, however, whether Household’s financial statement contained a material misstatement is not at issue—the first jury already definitively determined which statements were actionable and which were not. (The jury found that Household’s 2001 Form 10-K contained an actionable misstatement. *See* Dkt. 1611 at 27 (Statement 27).) The amendment to the 2001 Form 10-K, therefore, is not relevant to any issue in the new trial. Because it occurred after the close of the class period, the amendment by definition could not have any effect on loss causation or inflation during the class period. The Court should exclude evidence regarding Household’s post-class-period amendment of its 2001 Form 10-K.

E. Evidence Regarding State Civil and Regulatory Settlements and Negotiations

Plaintiffs have indicated that they intend to introduce evidence of various state civil and regulatory settlements entered into by Household both during and after the class period, as well as evidence related to settlement negotiations (P0009; P0235; P0516; P0550; P0553; P0554; P0556; P0578; P0598; P0634; P0681; P0964; P1109; P1314; P1328; P1329). During the class period and in the year following the class period, Household negotiated and entered into settlement agreements resolving state regulatory investigations and other proceedings, including a handful of civil settlements and one nationwide settlement with a group of state attorneys general. Some, but not all, of those proceedings involved allegations of improper lending practices. Pursuant to those settlements, Household instituted numerous responsive policies and practices. In addition, as part of the regulatory process and in connection with settlement of disputed claims, Household on occasion granted refunds to customers to rectify alleged errors or

other disputed amounts that had been brought to the company's attention through the process of negotiating with state regulators.

At the first trial, the district court held that evidence of the state civil and regulatory settlements, evidence of settlement-related refunds, and evidence of settlement-related policies and practices must be excluded pursuant to Rule 408.² Dkt. 1516 at 1-2, 5-7. For the same reason, this Court should exclude all nonpublic evidence of those settlements, the negotiations related to them, and remedial actions Household took as a result, including settlement-related refunds, policies, and practices.³ In addition to being inadmissible under Rule 408, evidence related to settlements that occurred after the close of the class period and nonpublic evidence about settlements and negotiations is irrelevant to the elements at issue in the new trial and may be excluded on that basis as well.

F. Evidence Regarding the SEC Consent Decree

Plaintiffs have indicated that they intend to introduce evidence of a consent decree that Household entered into with the SEC after the close of the class period (P1303, P1389). The SEC consent decree was entered on March 18, 2003, well after the class period in this action ended, and it alleged some of the same violations of the Exchange Act that Plaintiffs asserted in this litigation.

At the first trial, the district court excluded evidence of the SEC consent decree, Household's related offer of settlement, and any portion of a document that restated or

² The Court eventually allowed one such document (P0516) into evidence after finding that Defendant Aldinger's testimony had opened the door. *See* 2009 Trial Tr. 3458:23-3459:6.

³ Defendants do not dispute the potential relevance of evidence regarding the *public* settlement with state attorneys general, announced on October 11, 2002, which concerns the issues of causation and inflation. Nonpublic negotiations leading up to the settlement, however, should be precluded for the reasons articulated above.

paraphrased those documents pursuant to Rule 408. Dkt. 1516 at 1-2, 5-7. For the same reason, this Court should exclude all evidence of the consent decree. In addition to being inadmissible under Rule 408, evidence related to the consent decree is irrelevant to the elements at issue in the new trial and may be excluded on that basis as well. Because the consent decree occurred and was publicized well after the close of the class period, it cannot be relevant to proving loss causation or inflation.

G. Due Diligence and Related Documents Concerning Household's Potential Transaction with Wells Fargo

Plaintiffs seek to introduce materials relating to a proposed merger explored by Household and Wells Fargo in 2002 (code-named "Project Whiskey"), including internal Household communications documenting the process of the merger talks as well as nonpublic documents prepared by Wells Fargo and others relating to the merger negotiations (P0258; P0514; P1119; P1338; P1340; P1343; P1351; P1359; P1361; P1369; P1371). The merger was never consummated and the potential transaction was not made public. Plaintiffs apparently seek to introduce this evidence to show that Wells Fargo had concerns about the differences between its own re-aging policies and Household's policies, that Household was aware of those concerns, and to show the motive of the individual Defendants.

Defendants moved to exclude these materials from the first trial; the district court granted the motion in part and denied it in part. Dkt. 1516 at 11-12. The court agreed with Defendants that the opinions and observations expressed by the Wells Fargo due diligence team were hearsay and therefore inadmissible. *Id.* at 11. But the court ruled that non-hearsay evidence about the potential transaction was admissible because it was "highly probative of scienter" and also relevant to proving whether Household's "reporting methods were deceptive and/or misleading." *Id.* at 11, 12.

At the new trial, however, neither whether Household's reporting methods were "deceptive and/or misleading" will be an issue. The Wells Fargo transaction materials, and any testimony related to the potential transaction, are therefore irrelevant in the new trial. Any concerns Wells Fargo may have expressed about Household's policies in its nonpublic confidential memoranda, and whether Household was aware of those concerns, has no bearing on loss causation or inflation. And, as the district court correctly held in the first trial, Wells Fargo's statements in these documents are hearsay and are inadmissible for that additional reason. Further, many of the Wells Fargo due diligence materials, which were intended for confidential internal use, present a significant risk of unfair prejudice because they contain unguarded language and unfounded speculation. For example, they include opinions that various Household policies were "aggressive" and conjecture about the motives for those policies that could inappropriately influence the jury, especially coming from a recognized financial institution. *See* P1351; P1340. The Court should exclude the due diligence and related documents concerning Household's potential transaction with Wells Fargo.

H. Evidence Regarding an Alleged "Purge"

At the first trial, Plaintiffs argued that, in 2001, Household instituted an alleged "purge" to delete unapproved training materials and worksheets as well as unauthorized letters to customers regarding effective rates. *See, e.g.*, 2009 Trial Tr. 4458:19-4459:4; 4460:15-4461:16. Plaintiffs seek to introduce evidence about the alleged purge in the new trial (P0264; P0266; P0378; P0379; P0382; P0383; P0573; P0596; P0796; P0798; P0799; P0902), apparently to make the same argument.

The Court should exclude evidence and testimony about the alleged "purge" because it is irrelevant to proving loss causation or inflation. The only possible relevance of the alleged "purge" to this case was for demonstrating Household's state of mind, which is no longer at

issue. Plaintiffs should not be permitted to put this irrelevant evidence before the jury merely to further taint Household and to goad the jury into basing its loss-causation decision on scorn for Household rather than the experts' causation evidence. Moreover, any evidence related to the "purge" would result in a mini-trial about the reasons the unapproved materials were "purged," which would waste time, distract from the issues, and confuse the jury.

I. Other Nonpublic Documents Regarding Predatory Lending or Re-aging Practices

In addition to the eight categories of evidence described above, Plaintiffs seek to introduce other evidence of nonpublic information regarding predatory lending or re-aging practices. For example, Plaintiffs have indicated they will introduce evidence of individual customer complaints about Household's lending practices, or internal Household records of such complaints. *See, e.g.*, D0128; D0130; P0241; P0245; P0276; P0794; P0828; P0926; P1312; P1471. Plaintiffs have also indicated they will introduce evidence of the results of nonpublic examinations of Household's branch offices conducted by state regulators. *See, e.g.*, P0290; P0324; P0329; P0333; P0335; P0584; P0585; P0712; P0956; P1013; P1384. Plaintiffs further intend to introduce evidence of internal Household correspondence regarding potential changes to its re-aging practices. *See, e.g.*, P0067; P0068; P0070; P0074; P0075; P0086; P0097; P0114; P0512; P0654. A complete list of these and other irrelevant, prejudicial documents that Plaintiffs seek to introduce is in the attached Appendix (Exhibit A). These documents have no bearing on loss causation or inflation. They may have been relevant to proving the existence of material misstatements or scienter, but those elements are no longer at issue. The Court should exclude internal documents regarding predatory lending or re-aging practices and any testimony regarding those documents.

CONCLUSION

Defendants respectfully request that the Court exclude the foregoing evidence, which is not relevant to causation or inflation, from the trial of this matter.

Dated: April 22, 2016

Respectfully submitted,

/s/ R. Ryan Stoll

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CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on April 22, 2016, he caused true and correct copies of the foregoing Memorandum in Support of Defendants' Motion *In Limine* No. 1 to be served via the Court's ECF filing system on the following counsel of record in this action:

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/s/ R. Ryan Stoll
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EXHIBIT A: APPENDIX

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
A. Evidence Related to Consultant Andrew Kahr		
P0347	Memorandum re: U.S Consumer Finance Growth Strategies (Meeting with Andrew Kahr 12/18)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0348	Memo ""Initiatives to Accelerate Growth of U.S. Consumer Finance""; Memorandum from Gary Gilmer to Bill Aldinger, et al. Re: Initiatives to Accelerate Growth of U.S. Consumer Finance	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0349	Household Memorandum (Minutes of February 1999 Senior Management Meeting)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0533	Memorandum re: Redoing HFC Mortgage Forms to Impose High Prepayment Penalties	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0835	Letter Re late fees; Parity Act; Communications	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1006	Household International, General Ledger-Purge Detail	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1007	Household Memorandum re: Andrew Kahr	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1026	E-mail re: Kahr Memos	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial
P1388	SFGate.com Article, ""How Providian misled card holders""	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
B. Unapproved "Training" Video		
P0908	E-mail string re: Unauthorized Dated Material	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1383	HHS Training Video Cassette	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1472	Hueman resume	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
C. Evidence Regarding the Compensation or Stock Transactions of Defendants Aldinger, Schoenholz, and Gilmer		
D0758	Form 4 for Gary D. Gilmer, dated February 14, 2000 - statement for February 2000	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
D0759	Form 4 for Gary D. Gilmer, dated October 19, 2000 - statement for October 2000	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0763	Form 4 for Gary D. Gilmer, dated July 19, 2001 - statement for July 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0772	Compensation Committee Meeting Materials for September 10, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0773	Board of Directors Meeting Agenda July 26, 2002 8:30 a.m.	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0774	Compensation Committee Meeting Materials for January 28, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0774	Form 4 for William F. Aldinger, dated August 23, 2000 - statement for August 2000	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0775	Form 4 for William F. Aldinger, dated January 19, 2001 - statement for January 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0776	Agenda Item II: Executive Compensation Materials	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0796	Form 5 for David A. Schoenholz, dated January 21, 2002 - statement for December 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0797	Form 4 for David A. Schoenholz, dated May 15, 2002 - statement for May 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1038	E-mail with the subject Revised Tier 1&2 Spreadsheets attaching spreadsheet titled Highly Paid U.S. Employees - Tier 1- Parachute Calculations	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1476	Aldinger deposition transcript from SEC Proceeding, In the Matter of Household International, File No. C-03571-A	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403); Hearsay (FRE 805); LR 16.1, Pretrial Order Form as to testimony
D. Evidence Regarding Household's Post-Class-Period Amendment of Its 2001 Form 10-K		
P1267	Household International, Inc. Form 10-K A No. 2 for the Fiscal Year Ended December 31, 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Subsequent Remedial Measure (FRE 407)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
E. Evidence Regarding State Civil and Regulatory Settlements and Negotiations		
P0009	Arizona Consent Decree	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407)
P0235	Multiple Docs [HHS02139957-88: Letter (HFC's Reply to State's Feedback Re: HFC's Response to the 7/9/02 Multistate Working Group Meeting)]; Letter to David W. Huey Re: meetings of the multistate working group with accompanying Volume Information	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407)
P0516	E-mail string re Discussion Framework	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)
P0550	Forwarded E-mail (Multistate Working Group Reply to HFC)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)
P0553	States' Reply to HFC's Response of 7/17/02	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Hearsay (FRE 802)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0554	E-mail Subject: Estimated Impacts	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)
P0556	Sodeika notes re Settlement Request from AARP 11/01 and Settlement Outline from WA	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)
P0578	Letter from the Office of the Attorney General of Washington re: Request for General Information for the July 9, 2002 Meeting	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Offer to Compromise/Settlement (FRE 408); Hearsay (FRE 802)
P0598	Appendix A - Consumer Lending, By Household International	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Settlement/Compromise (FRE 408)
P0634	E-mail Subject: Framework for the Discussion of Issues Concerning Lending Practices of Household International, Inc.	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0681	AG Costs, Sides Loans	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer to Compromise/Settlement (FRE 408)
P0964	Letter re: Household Finance/Beneficial Settlement with State of California Department of Corporations	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407); Hearsay (FRE 802)
P1109	E-mail re: AGs	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408)
P1314	Summary of Refunds and Other Remedies Proposed by Attorneys Genera; By Predatory Practice	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408); Improper Summary Evidence (FRE 1006)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1328	Letter (Settlement Discussion - Reply to HFC's 7/17/02 Response)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408)
P1329	Attorney General of Washington letter RE: Multistate Working Group	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408)
F. Evidence Regarding the SEC Consent Decree		
P1303	SEC Consent Decree Order Re: Instituting cease-and-desist proceedings, making findings, and imposing cease-and-desist order pursuant to section 21c of the SEA of 1934	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407)
P1389	RNS - company news service from the London Stock Exchange - Household Announces Mailing of Supplemental Proxy Materials to Shareholders; Enters into Consent Order with SEC Without Admitting or Denying Wrongdoing	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Offer of Compromise/Settlement (FRE 408); Hearsay (FRE 802)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
G. Due Diligence and Related Documents Concerning Household's Potential Transaction with Wells Fargo		
P0258	E-mail Subject: Whiskey Reage Calculations	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0514	E-mail string Re: Whiskey Reage Calculations w/ handwritten notes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1119	E-mail string re: Whiskey	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1338	Wells Fargo Bank Corporate Consumer Credit Administration	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1340	E-mail string Re: Observations of Debriefing Package from Corporate Consumer Credit Administration	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1343	E-mail Subject: FW: Message from Les Biller - re: Blazer	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1351	Consumer Finance, WFF Due Diligence, Blazer Executive Summary by the Business Team, May 9, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Lacks Authentication (FRE 901)
P1359	Confidential Household International, Inc. Board of Directors May XX, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Lacks Authentication (FRE 901)
P1361	Board of Directors of Wells Fargo & Company Presentation	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Lacks Authentication (FRE 901)
P1369	E-mail Subject: Blazer Board Presentation with attached April Board Meeting - April 11	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1371	E-mail chain Subject: FW: Project Blazer	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
H. Evidence Regarding an Alleged "Purge"		
P0264	E-mail re: Use of Sales Forms	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0266	Memo re: Prohibited Sales Practices	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0378	E-mail (Fla Review)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0379	FAX (Florida Review/Effective Rate complaints/Prohibited Sales Practices); Fax Re: IMPORTANT (E-mails Re: Fla Review attached to fax)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0382	E-mail re: Responsible Lending Summit - June 20, 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0383	Responsible Lending Practices, Authorized/Approved Sales Related Material	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0573	E-mail string re: Effective Rate	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0596	E-mail re: Very important to do today.	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0796	E-mail string re: Unauthorized Materials	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0798	E-mail string re: URGENT -- Responsible Lending Summit Presentations	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0799	Forwarded E-mail (Equivalent Rate Sheet); E-mail from Ned Hennigan to Dana Williams re Equivalent Rate Sheet	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0902	Forwarded E-mail (Unauthorized HOLP's); E-mail from Robert O'Han to Mike Pinto Re: Unauthorized HOLP's	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
I. Other Non-Public Documents Regarding Predatory Lending or Re-aging Practices		
P0019	Household Bank FSB, Prospect Heights IL - FDIC Issues and Findings, FDIC Review Concurrent with OTS Exam	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (802)
P0024	OCC Advisory Letter 2000-7 to Chief Executive Officers and Compliance Officers of All National Banks, Department and Division Heads, and All Examining Personal Re: Abusive Lending Practices	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Hearsay (802)
P0041	Bulletin re: Prohibited Sales Practices	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
D0061	KPMG Report on Accounting and Credit Policies, dated March 12, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0067	E-mail Subject: Re: Reage Testing and Tracking	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0068	Presentation - Reage Policy Changes 2003	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0070	E-mail Subject: re: Reage Policies	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0074	Memo Subject: Re: August Results	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0075	E-mail Subject: Re-age Recidivism Re-stated	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0076	E-mail Subject: Re: S&P Presentation	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0077	E-mail Subject: Re: Re-age Single vs. Multiple; Attachment Single vs. Multiple.xls	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0079	E-mail re: DAS request - OTS recidivists	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0086	E-mail chain Subject: Re: Reage Volume in June - Urgent	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0095	E-mail string re: Earnings Release Certification	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0097	E-mail Subject: Reage Meeting Summary	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0102	E-mail string re Minutes for April 7, 2000 Credit Committee	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0114	E-mail Subject: Re: Reage Targets & Policy Meeting 8/1	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0118	E-mail string Subject: Spike report for 4/9/2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0128	Memo dated February 20, 2001 from Carla Madura to Robin Allcock and Tom Schneider re: January 2001 AG, BBB, and Regulatory Complaints	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0129	E-mail string re: Chapter 13 Restructures	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0130	Memo dated May 25, 2001 from Carla Madura to Robin Allcock and Tom Schneider re: March & April 2001 AG, BBB, and Regulatory Complaints	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0151	Household Mortgage Services, Restructure Review, April 26, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0157	E-mail Subject: All of the Collection Changes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0176	Household Quality of Accounting Policies Applied in Financial Reporting with handwritten notes, 11/13/2000	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0180	Memorandum Re: discussion document reviewed by Dave Stockdale and Paul Makowski	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial
P0181	E-mail re: Delinquency	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0185	E-mail re: Restructure Performance	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0188	Attachment to HI Management Certification	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0234	Letter Re: Process Served in California for Beneficial California, Inc.	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (802)
P0239	Letter re: Washington DFI's Subpoena Duces Tecum No. 2002-140-S01	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial: Hearsay (FRE 802)
P0241	Executive Complaints - January Review	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0245	Memorandum re: November & December 2000 AG, BBB & Regulatory Complaints	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0262	E-mail re: 2+ Reconciliation	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0265	HFC First Mortgage Sales Materials	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0267	E-mail with the subject Tomorrow	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0269	The HFC Sales Staff Plan (eff. 1/1/2000)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0276	Housing Discrimination Complaint for Jose Nanez	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0285	Letter re: Inquiry Re: Feo Ranges on the Good Faith Estimate	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0289	Deposition Transcript of Charles Cross take in Luna v. Household Finance Corp., No. C02-1635 (W.D. Wash.)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 804(b)(1)) as to the individual defendants; LR 16.1, Pretrial Order Form as to testimony
P0290	Washington DFI Expanded Report of Examination for Household Finance Corporation III as of April 30, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0298	E-mail Subject: January 2001 Skip-A-Pay	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0303	E-mail re: Review	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0305	Loan Features/Calculations (Overview) for HFC	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
D0308	Household International Minutes of the Meeting of the Board of Directors dated March 12, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0313	E-mail from Paul Makowski to William Aldinger, et al. Re: Delinquency	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0324	Letter from Minnesota Department of Commerce to Household Board of Directors re Industrial Loan and Thrift Examination - IL 920 Plymouth, MN	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0329	Faxed copy of New Jersey Beneficial Exam	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0333	Household Letter Re: Regulatory Examination Licenses MLB-111 7 ML-18 (Virginia)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0335	Commonwealth of Virginia State Corporation Commission Bureau of Financial Institutions Letter Re: License No. MLB-215	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0373	Memorandum re: March Monthly Letter	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0386	Agenda for Meeting with Household Finance Corporation	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0428	Memorandum re: Field Visit Examination as of March 12, 2001 with handwritten notes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0440	E-mail re: No Subject	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0445	E-mail string re: Meeting with Michigan Regulators	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0447	E-mail string re: Parity Act	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0454	Handwritten Notes re 2+	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0461	Memorandum re: December and YTD Operating Results	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0463	E-mail string re: MAC Follow-Up	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0472	Various Memo Documents Including: May 23, 2002 Household Finance Corp Agenda, State of Washington May 23, 2002 Meeting with HFC; Memorandum from Kay Curtin to Gary Gilmer and Ken Robin Re: State of Washington Meeting with HFC, Material Issues to be Addressed in Enforcement Action or Settlement	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0481	HFC Beneficial Memo Subject: October Results	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0482	Letter from re: July Results	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0496	Letter/Attachments Re: Bill Ryan's Negative First Call Coverage of HI compared to Associates + other analysts First Call notes of Associates	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0499	Memo Re Presentation Material for Board Meeting	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0508	E-mail string from William Aldinger to Gary Gilmer and Kenneth Robin Re: NJ Audit	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0510	E-mail from re: Florida AG	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0512	E-mail from re: Florida AG+68:71	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0530	E-mail string re: Volumes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0540	E-mail Subject: Skip-A-Pay Update 1/15	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0543	Report re: March	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0545	Household Interoffice Memorandum with attached Memorandum Subject: July Results;	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0557	HFC/Beneficial Quality Control Interoffice Memorandum subject: Review of benefits test on booked loans from August, November and December of 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0559	Review of Benefits Test; Booked Loans from November and December 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0562	Faxed E-mail and Bulletin Board Re Charging Points and Origination Fees; Fax with attached E-mails and memos Re: Points on points	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0584	Letter w/ attachment re: Examination of Elmhurst Office	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0585	Fax of Household Letter 12/27/2001re: Report of Examination, Household Finance Corporation III - License #000211; Branches 001-009	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0618	E-mail Subject: Reage policies	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0649	E-mail re: Reage Policy	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0650	E-mail Subject: Reage Policy	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0654	E-mail string re Retail Services Reage Policy	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0671	E-mail Subject: Big Apple	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0694	Household Review of Loss Reserves & Quality of Accounting Policies	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0712	Comptroller of the Currency Administrator of National Banks: Report of Examination Household Bank (SB), N.A. Las Vegas, NV	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0717	Household International 1999 Consolidated Internal Audit Plan	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0726	E-mail string Re: Revise reage analysis	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0765	HFC Branch Sales Manager, 2001 Incentive Compensation Overview	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0770	Memo Re: Special Restructures	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0794	Memorandum re: March & April 2001 AG, BBB, & Regulatory Complaints	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0825	Price Waterhouse Coopers Presentation, Correspondent Lending Roundtable, Predatory Lending - Responding to the Risks	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0826	Steps to finding equivalent interest rate	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0828	FAX/Letter/Notes (Washington's Analysis of Household Finance/ Beneficial Complaints from May 2000-2001); Fax from Tom Schneider to Craig Castelein Re: 5/17/01 Memo from Patrick Hardman to Chuck Cross	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Lacks Authentication (FRE 901)
P0842	Memorandum re: California Complaint	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0846	Letter Re: formation of Household International's Consumer Advisory Board	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Subsequent Remedial Measure (FRE 407); Hearsay (802)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0858	E-mail string re No Subject	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0867	E-mail chain re Accounting presentation	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0898	Memorandum re: Insurance Service Staff Meeting; r	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0899	Fax re: June/July 1999 Fax with attached Presentation (First Mortgage Sales HFC Northeastern Division)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0900	E-mail Subject: Comparable/Equivalent Rate	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0901	E-mail re: effective rate	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0903	Fax (Finding the 30 year equivalent of HFC's Bi-Weekly Program); re: 1st Mortgage	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0916	Household Memorandum re: July Monthly Letter	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0926	E-mail (Subject: Customer Complaints)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0956	Faxed Kansas' Report of Examination; Fax from Carla Madura to Robin Allcock Re: Examination of Kansas License	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0965	E-mail string from Robin Allcock to Susan Mocerino Re: AMPTA	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0967	Letter re: Field Visit Examination as of March 12, 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P0984	Letter Re: Julian and Terry Johnston, HFC Loan No. 921300-00-871702 & 921300-12-114116, Your Complaint No. 2382	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P0986	Memorandum re: ACORN	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P0993	Forbes - Bernard Condon Questions with handwritten Notes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1011	E-mail string re: ROI	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1013	E-mail Subject: Re: Waite Park (54-5202), Minnesota Examination Response	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1017	E-mail Subject: Please Print this for Fran with attachment: Branch Visit and QAC Audit Review Summary July 9 - July 11, 2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1018	E-mail re: QAC Onsite Visit Objectives	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1020	E-mail chain Subject: Re: Chapter 13 Restructures	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1048	E-mail Subject: Re: VRU EZPay attempted enrollment daily report	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1090	Restructure Policy Summary By Business Unit from January 2000 to Present	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1095	AE, Branch, District & Division 2000 Goals	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1096	Letter - Request for waiver of prepayment penalty or rescindment of application fee/prepaid finance charge with attached Forbes Article; Letter re: an urgent request to waive the PPP on a mortgage loaned refinanced with HFC in February 2002	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1100	E-mail Subject: Legacy Restructures	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1103	E-mail re: coll rewrites	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1112	E-mail Subject: HOEPA/Section 32	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1117	E-mail Subject: Reage Meeting Summary 7/9/2002	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1131	E-mail string re: accelerating charge offs in third or fourth quarter	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1148	E-mail Subject: Follow-up To Yesterday's Meeting	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1150	E-mail re: Reage Recidivism	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1204	OTS Report of Examination, August 27, 2001	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1205	OTS Special Compliance Examination	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1224	Presentation Re: KPMG Report on Accounting and Credit Policies Detailed Portfolio Matrices - Final	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1312	Raymond Chenvert and Alisa Chenvert, husband and wife, vs. Household Finance Corporation, Household Realty Corporation, Household Finance Corporation III	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1317	Timeline of State Investigations of Household	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408); Improper Summary Evidence (FRE 1006)
P1318	HOUSEHOLD DATA BY STATE - Average Points for Closed End Loans (%)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)
P1319	HOSUEHOLD DATA BY STATE - Number of Loans Greater than 100% LTV	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)
P1320	HOUSEHOLD DATA BY STATE - Home Equity Lines of Credit with Greater than 90% of Line Disbursed at Closing (%)	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)
P1321	HOUSEHOLD DATA BY STATE - Percentage of Real Estate Loans with Any Insurance	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1322	HOUSEHOLD DATA BY STATE - Percentage of All Real Estate Loans With Life Insurance	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)
P1325	Customer ""Benefits"" From Household Loans	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Improper Summary Evidence (FRE 1006)
P1326	Regulatory Findings By State	Irrelevant (FRE 402); Confusion of the Issues, Waste of time, Unfair prejudice (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408); Improper Summary Evidence (FRE 1006)
P1333	Letter re: Expanded Report of Examination	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Offer of Compromise/Settlement (FRE 408); Lacks Authentication (FRE 901); Incomplete Document (FRE 106)

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1335	First Mortgage Sales, HFC Central Division Binder	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1384	E-mail chain Subject: State of TN Branch 84-3001 Examination	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1385	E-mail chain Subject: Fitch servicer review	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1386	E-mail string re Fitch Data	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1387	E-mail Subject: Re-age Fitch Servicer Presentation Slides	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1437	Institutional Shareholder Services. - Heidi Brown, Analyst - Proxy Analysis Report	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802)
P1467	Household Bi-Weekly Program Work Sheet - Completed	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial

EXHIBIT NUMBER	DESCRIPTION	DEFENDANTS' OBJECTIONS
P1469	Household Memorandum re: March Month End Results	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1470	email string re Media Issue in Washington State	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1471	Vossen Complaint	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial
P1589	Handwritten notes	Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document does not relate to issues in the retrial; Hearsay (FRE 802); Lack of Foundation (FRE 901)