

**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, )  
 )  
 Plaintiff, ) CLASS ACTION  
 )  
 vs. ) Honorable Jorge L. Alonso  
 )  
 )  
 HOUSEHOLD INTERNATIONAL, INC., et )  
 al., )  
 )  
 Defendants. )  
 )

**[PROPOSED] FINAL PRETRIAL ORDER**

This matter having come before the Court at a pretrial conference held pursuant to Fed.

R. Civ. P. ("Rule") 16, and

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having appeared as lead counsel for lead plaintiffs Glickenhau & Company, PACE Industry  
Union Management Pension Fund, the International Union of Operating Engineers Local No.

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having appeared as lead counsel for Defendant William F. Aldinger, and

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having appeared as lead counsel for Defendant David A. Schoenholz, and

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having appeared as lead counsel for Defendant Gary Gilmer, the following actions were taken:

1. This is a certified class action brought under §§10(b) and 20(a) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. §§78j(b) and 78t(a), and the rules and regulations promulgated thereunder, including SEC Rule 10b-5, 17 C.F.R. 240.10b-5 and the jurisdiction of the Court is invoked under §27(a) of the Exchange Act, 15 U.S.C. §78aa. Jurisdiction is not disputed.

2. The following stipulations and statements were submitted and are attached to and made a part of this Order:

(a) Exhibit A – A comprehensive stipulation or statement of all uncontested facts, which will become a part of the evidentiary record in the case and which may be read to the jury by the Court or any party.

(b) Exhibit B – Plaintiffs’ proposed short description of the case to be read to prospective jurors is attached as Exhibit B-1. Defendants’ proposed short description of the case to be read to prospective jurors is attached as Exhibit B-2. Plaintiffs’ Proposed Statement of the Prior Proceedings to be Read and Given to the Jury (“Statement”) is attached as Exhibit B-3. As

set forth in Plaintiffs' Motion *in Limine* No. 1, plaintiffs believe that in light of the procedural posture of the case and the nature of the issues to be determined in the retrial, the Statement should be read and given to the jury. Defendants object to the Statement on the grounds that will be set forth in Defendants' response to Plaintiffs' Motion *in Limine* No. 1. The parties have agreed that much of the information normally sought in oral voir dire questions can more effectively and efficiently be elicited in the form of a written questionnaire to prospective jurors so as to both ease the burden on the Court and protect the privacy of potential jurors. Thus, the parties have agreed upon a set of questions to be included in a written jury questionnaire, and the parties propose that the written jury questionnaire attached as Exhibit B-4 be administered to prospective jurors. In addition, there are certain questions that the parties did not agree to include in the proposed written jury questionnaire. Thus, plaintiffs and defendants separately propose that the Court ask certain additional questions in oral voir dire. A proposed list of those questions with corresponding objections is attached as Exhibit B-5. Plaintiffs propose that each side be allowed 30 minutes of attorney conducted voir dire; Defendants oppose plaintiffs' request for attorney conducted voir dire and believe any further voir dire should be conducted by the Court pursuant to the Court's stated practice.

B-1 – Plaintiffs' Proposed Short Description of the Case.

B-2 – Defendants' Proposed Short Description of the Case.

B-3 – Plaintiffs' Proposed Statement of the Prior Proceedings to Be Read and Given to the Jury.

B-4 – [Proposed] Joint Jury Questionnaire.

B-5 – Joint Submission of Proposed Voir Dire Questions and Corresponding Objections.

(c) Exhibit C – Except for rebuttal and impeachment exhibits, schedules of exhibits (other than demonstrative evidence) expected to be offered in evidence during trial.

C-1 – Plaintiffs' Exhibit List (with Defendants' objections and Plaintiffs' responses).

C-2 – Defendants’ Exhibit List (with Plaintiffs’ objections and Defendants’ responses).

(d) Exhibit D – Lists of names and addresses of the potential witnesses to be called by each party, with a statement of any objections to calling, or to the qualifications of, any witness identified on the list.

D-1 – Plaintiffs’ Witness List.

D-2 – Defendants’ Objections to Plaintiffs’ Witness List.

D-3 – Defendants’ Witness List.

D-4 – Plaintiffs’ Objections to Defendants’ Witness List.

(e) Exhibit E – Statements setting forth the qualifications of each expert witness to be read to the jury at the time the expert witness takes the stand.

E-1 – Plaintiffs’ Statement of Qualifications of Expert Witnesses to Be Read to the Jury.

E-2 – Defendants’ Objection to Plaintiffs’ Statement of Qualifications of Expert Witnesses to Be Read to the Jury.

E-3 – Defendants’ Statement of Qualifications of Expert Witnesses to Be Read to the Jury.

E-4 – Plaintiffs’ Objection to Defendants’ Statement of Qualifications of Expert Witnesses to Be Read to the Jury.

(f) Exhibit F – A list of all depositions, and designated page and line numbers, to be shown to the jury via video and statements of any objections thereto is attached as Exhibit F-1. A list of trial testimony, and designated page and line numbers to be read to the jury and statements of any objections thereto is attached as Exhibit F-2.

F-1 – Plaintiffs’ Deposition Designations (with Defendants’ objections and completeness designations and Plaintiffs’ objections to Defendants’ completeness designations).

F-2 – Plaintiffs’ Trial Designations (with Defendants’ objections and completeness designations and Plaintiffs’ objections to Defendants’ completeness designations).

(g) Exhibit G – Plaintiffs’ itemized statement of damages.

(h) Exhibit H – Proposed jury instructions, verdict forms, and objections.

H-1 – Joint Proposed Jury Instructions.

H-2 – Plaintiffs’ Additional Proposed Jury Instructions.

H-3 – Defendants’ Responses and Objections to Plaintiffs’ Proposed Jury Instructions.

H-4 – Plaintiffs’ Proposed Verdict Form.

H-5 – Defendants’ Responses and Objections to Plaintiffs’ Proposed Verdict Form.

H-6 – Defendants’ Additional Proposed Jury Instructions.

H-7 – Plaintiffs’ Objections to Defendants’ Proposed Jury Instructions (includes Objection to Gilmer’s Proposed Jury Instruction).

H-8 – Defendants’ Proposed Verdict Form.

H-9 – Plaintiffs’ Objections to Defendants’ Proposed Verdict Form (includes Objection to Gilmer’s Proposed Verdict Form).

H-10 – Defendant Gary Gilmer’s Additional Proposed Jury Instruction and Verdict Form

(i) Each party has completed discovery, including the depositions of expert witnesses. Absent further Court order for good cause shown, no further discovery shall be permitted.

(j) Exhibit J – Lists of each party’s intended motions *in limine*. Pursuant to the Court’s Order, briefs in support of the parties’ motions *in limine* shall be filed by April 22, 2016; oppositions to the motions *in limine* are due on May 6, 2016; replies are due on May 13, 2016.

J-1 – List of Plaintiffs’ Motions *In Limine*.

J-2 – List of Defendants’ Motions *In Limine*.

(k) Exhibit K – Statements of the contested issues of fact and law.

K-1 – Plaintiffs’ statement of the contested issues of fact and law.

K-2 – Defendants’ statement of the contested issues of fact and law.

(l) No claims or defenses subject to this proceeding have been waived or abandoned by any party. Certain claims and defenses were determined by the first trial and affirmed by the Court of Appeals. *Glickenhau & Co. v. Household Int'l, Inc.*, 787 F.3d 408 (7th Cir. 2015).

3. Plaintiffs anticipate that the trial of this case will take 12-15 Court days. Defendants expect the trial of this case to take 7-9 Court days.

4. This action will be tried by a jury. The plaintiffs recommend that eight jurors be selected at the commencement of the trial. Defendants recommend that 12 jurors be selected at the commencement of the trial.

5. The trial relates to issues of loss causation, damages and proportionate liability.

6. The parties do not consent to reassignment of this case to a magistrate judge for trial.

7. This Order will control the course of the trial and may not be amended except by consent of the parties and the Court, or by order of the Court to prevent manifest injustice.

8. Possibility of settlement of this case was unsuccessfully considered by the parties in the course of separate private mediation sessions in May 2005, May 2008, June 2011, June 2014; before this Court on August 22, 2005; and in the Seventh Circuit's mediation program in December 2013 and January 2014.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

[Attorneys are to sign the form before presenting it to the court.]

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**STATEMENT OF UNCONTESTED FACTS**

**[Exhibit A to [Proposed] Final Pretrial Order]**

The parties agree that the following facts are uncontested. The following uncontested facts are a part of the evidentiary record in the case and may be read to the jury by the Court or any party.

UNCONTESTED FACT NO. 1:

There is no unresolved jurisdictional question in this case. The parties agree that the United States District Court for the Northern District of Illinois has jurisdiction over this civil class action because it arises under the laws of the United States.

UNCONTESTED FACT NO. 2:

The claims asserted arise under and pursuant to §§10(b) and 20(a) of the Securities Exchange Act of 1934 (“1934 Act”) [15 U.S.C. §§78j(b) and 78t(a)] and Rule 10b-5 promulgated thereunder by the United States Securities and Exchange Commission (“SEC”) [17 C.F.R. §240.10b5].

UNCONTESTED FACT NO. 3:

This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §1331 and §27 of the 1934 Act [15 U.S.C. §78aa].

UNCONTESTED FACT NO. 4:

This is a class action. Plaintiffs are all persons who purchased or otherwise acquired common stock of Household International, Inc. (“Household” or the “Company”) between March 23, 2001 and October 11, 2002 (the “Class Period”). The class is represented by three co-Lead Plaintiffs, Glickenhau & Company, PACE Industry Union Management Pension Fund, and The International Union of Operating Engineers Local No. 132 Pension Plan.

UNCONTESTED FACT NO. 5:

During the Class Period, Household was a publicly-traded company whose common stock traded on the New York Stock Exchange under the symbol HI.

UNCONTESTED FACT NO. 6:

Shares of Household common stock were securities.

UNCONTESTED FACT NO. 7:

Household common stock traded in an efficient market.

UNCONTESTED FACT NO. 8:

During the Class Period, Household served over 50 million customers and had 31,000 employees in several different business units, including Consumer Lending, Mortgage Services, Retail Services, Auto Financing and Credit Card Services. Household's Consumer Lending Business Unit operated about 1,400 consumer lending branch offices in 46 states and employed approximately 12,000 people.

UNCONTESTED FACT NO. 9:

Defendant William Aldinger was, during the Class Period, Chief Executive Officer of Household and Chairman of the Household Board of Directors.

UNCONTESTED FACT NO. 10:

Defendant David Schoenholz was, during the Class Period, President and Chief Operating Officer and Vice-Chairman of the Household Board of Directors. During the Class Period, Schoenholz also served as Chief Financial Officer of Household.

UNCONTESTED FACT NO. 11:

Defendant Gary Gilmer was, during the Class Period, Vice-Chairman of Consumer Lending and Group Executive of U.S. Consumer Finance.

UNCONTESTED FACT NO. 12:

During the Class Period, Household reported 2+ delinquency and charge-off statistics to investors in press releases and SEC filings.

UNCONTESTED FACT NO. 13:

During the Class Period, the revenue and expense figures that Household recorded included revenue and expenses associated with certain credit card contracts. On August 14, 2002, Household publicly announced that it would restate its earnings for the prior eight years based on the accounting for those credit card contracts, reducing its reported net income for those years.

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
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LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' PROPOSED SHORT DESCRIPTION OF CASE TO BE READ TO  
PROSPECTIVE JURORS**

**[Exhibit B-1 to [Proposed] Final Pretrial Order]**



This lawsuit is a civil action, as distinguished from a criminal proceeding. A prior jury found the Defendants liable for knowingly or recklessly making 17 false and misleading statements and material omissions to the investing public. This jury will decide what damages, if any, were caused by Defendants' false and misleading statements.

### **THIS IS A CLASS ACTION**

This case was brought as a class action, which is a procedure that allows one plaintiff, or a small number of plaintiffs (the "Class Representatives" here), to represent a larger number of individuals or legal entities in the lawsuit. A class action allows the claims of all class members to be presented and resolved in one case, which can make more efficient use of the time, money and resources of the court system, the juries and the parties. In this case, the three Class Representatives have brought this class action on behalf of themselves and as representatives of all investors that purchased the common stock of Household during the time period between March 23, 2001 and October 11, 2002, including corporations, other institutional investors and individuals. The investors that fit that description are called Class Members, or, collectively, the Class. The period of time between March 23, 2001 and October 11, 2002 is referred to as the Class Period. The outcome of this trial will bind all members of the Class and all four Defendants.

### **WHO ARE THE PARTIES AND WHAT DO THEY DO?**

The three Class Representatives are Glickenhau & Company, PACE Industry Union Management Pension Fund, and The International Union of Operating Engineers Local No. 132 Pension Plan.

In this trial there are four Defendants, Household and three of its former senior executives. During the period of this lawsuit, Household was a publicly-traded company whose common stock traded on the New York Stock Exchange. Household was primarily a holding company with operating subsidiaries engaged in various types of consumer lending.

In addition to the corporate Defendant Household, three Individual Defendants are being sued, each of whom was a member of Household's senior management during the relevant time. They are William Aldinger, who was the Chief Executive Officer (or "CEO") and Chairman of the

Board of Directors of Household; David Schoenholz, who was the Chief Financial Officer (or “CFO”) and Vice-Chairman of the Board of Directors of Household; and Gary Gilmer, who was the Vice Chairman and President of Household’s Consumer Lending Group and Group Executive of U.S. Consumer Finance. Household and the three individuals will be referred to collectively as “the Defendants.”

### **WHAT IS THIS CASE ABOUT?**

The Plaintiffs have brought claims against the four Defendants under the federal securities laws. The federal securities laws are laws that prohibit the issuance of materially false or misleading statements by public companies in connection with investors buying and selling stock. The federal securities laws are designed to protect investors from fraud. Plaintiffs in this case claim that: 1) they purchased shares of Household common stock and that they suffered damages in their investments; and 2) Defendants caused their damages because they knowingly or recklessly made 17 false or misleading statements and failed to disclose important or “material” facts about the company that an investor has the right to know.

### **WHAT ARE THE PLAINTIFFS’ CLAIMS?**

A prior jury found that during the relevant period Household and its senior officers defrauded investors in three ways:

*First*, Defendants issued false statements and made material omissions about Household’s predatory lending practices and the impact of those practices on its business and financial results.

*Second*, Defendants issued false statements and material omissions about the credit quality of Household’s loans, including its loan delinquency and charge off statistics and Defendants’ use of creative accounting to hide the true condition of its loan portfolio.

*Third*, Defendants manipulated Household’s publicly-reported financial results by accounting for certain contracts of its credit card bank subsidiaries in a way that deferred reporting expenses and inflated its net income. Household eventually revised (or “restated”) its previously issued earnings reports which is an admission that its prior financial results were materially false and misleading.

Furthermore, Plaintiffs claim that Defendants' fraudulent statements caused Household's stock to trade at higher prices than it would have if Defendants had told the truth, and that the disclosure of the truth later in the Class Period caused Household's stock price to decline. As a result, Plaintiffs suffered damages. Defendants deny that their false statements caused plaintiffs' damages. If the jury finds that the 17 false and misleading statements caused plaintiffs' economic loss, you will also have to determine each defendants' percentage of responsibility for that economic loss.

DATED: April 22, 2016

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NORTHERN DISTRICT OF ILLINOIS  
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 vs. ) Honorable Jorge L. Alonso  
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 HOUSEHOLD INTERNATIONAL, INC., et )  
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 Defendants. )  
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**DEFENDANTS' PROPOSED SHORT DESCRIPTION OF CASE TO BE READ TO  
PROSPECTIVE JURORS**

**[Exhibit B-2 to [Proposed] Final Pretrial Order]**

This lawsuit is a civil action involving claims under the federal securities laws and relates to stock purchases occurring during 2001 and 2002 of a company named Household International.

The case has been brought as a class action on behalf of all investors that purchased the common stock of Household during the time period between March 23, 2001 and October 11, 2002, including corporations, other institutional investors, and individuals.

The three institutional investors who represent the class of stock purchasers for this case are Glickenhau & Company, PACE Industry Union Management Pension Fund, and The International Union of Operating Engineers Local No. 132 Pension Plan. These three representatives and the class of investors will be referred to collectively as “the Plaintiffs.”

In this trial there are four Defendants, Household and three of its former senior executives: William Aldinger, who was the Chief Executive Officer (or “CEO”) and Chairman of the Board of Directors of Household; David Schoenholz, who was the Chief Financial Officer (or “CFO”) and Vice-Chairman of the Board of Directors of Household; and Gary Gilmer, who was the Vice Chairman and President of Household’s Consumer Lending Group and Group Executive of U.S. Consumer Finance. Household and the three individuals will be referred to collectively as “the Defendants.”

During the period of this lawsuit, Household was a publicly-traded company whose common stock traded on the New York Stock Exchange. Household was the parent company of a number of operating subsidiaries involved in various types of consumer lending, including what is referred to as “subprime” lending to those consumers who may not otherwise qualify for traditional bank loans.

In previous proceedings in this matter, Plaintiffs identified 40 statements made by one or more of the Defendants that Plaintiffs alleged to contain misstatements or omissions of material information under the federal securities laws. Plaintiffs alleged that those statements misstated or omitted material information concerning one or more of three issues:

*First*, false statements and omissions about whether Household engaged in “predatory lending” practices.

*Second*, false statements and omissions about the credit quality of Household’s loans, including its loan delinquency statistics and loan “re aging” practices.

*Third*, false statements and omissions regarding accounting for certain contracts involving its credit card bank subsidiaries. Household issued a “restatement” that revised (or “restated”) its previously issued financial reports with respect to those contracts.

In prior proceedings in this case, it was determined that 17 of the 40 statements alleged by Plaintiffs contained misstatements or omissions of material information regarding one or more of those three issues. Plaintiffs’ allegations regarding the other 23 statements were rejected. As to one of the 17 misstatements or omissions, Household and Mr. Aldinger were determined to have acted knowingly, and Mr. Gilmer was determined to have acted recklessly. As to the remaining 16 misstatements or omissions, Household and Mr. Aldinger and/or Mr. Schoenholz were determined to have acted recklessly. Mr. Gilmer was determined not to have made any of those remaining 16 misstatements or omissions. The jury in this case will be provided with an Exhibit setting forth each of those statements, which issue or issues the statement addresses, who is responsible for the statement, and whether the misstatement was made knowingly or recklessly.

This trial will now address three matters relating to those 17 misstatements:

*First*, did one or more of the 17 misrepresentations cause an economic loss to the plaintiffs?

*Second*, if any misrepresentation caused an economic loss to the plaintiffs, how much, if at all, did each such misrepresentation artificially inflate Household's stock price?

*Third*, what percentage of proportionate responsibility for plaintiffs’ economic loss, if any, is attributable to each of the four defendants?

Dated: April 22, 2016

Respectfully submitted,

/s/R. Ryan Stoll

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' PROPOSED STATEMENT OF THE PRIOR PROCEEDINGS TO BE  
READ AND GIVEN TO THE JURY**

**[Exhibit B-3 to [Proposed] Final Pretrial Order]**



This is a class action securities fraud case against defendants Household International, Inc. (“Household” or the “Company”) and three former Household executives (the “Individual Defendants”; collectively with Household, “defendants”):

- William F. Aldinger, who served as Household’s Chief Executive Officer and Chairman of Household’s Board of Directors;
- David A. Schoenholz, who served as Household’s Chief Financial Officer and Vice-Chairman of Household’s Board of Directors; and
- Gary Gilmer, who served as Vice Chairman and President of Household’s Consumer Lending Group and Group Executive of U.S. Consumer Finance.

The case involves a series of false statements and omissions made by defendants concerning Household’s predatory lending and reaging practices, the quality of Household’s loan portfolio, and improper accounting. At a prior proceeding in this case, it was determined that the defendants committed securities fraud by making 17 materially false and misleading statements in violation of §10(b) of the Securities Exchange Act of 1934. On March 23, 2001, defendants Household and Aldinger knowingly made the first false statement with the intent to manipulate or deceive investors, and Gilmer recklessly made this statement. Household and one or more of the Individual Defendants recklessly made the remaining false or misleading statements and omissions, that is, they made those statements or omissions with an extreme departure from the standards of ordinary care. Defendants’ extreme departure from the standards of ordinary care presented a danger of misleading investors that either was known to the defendants or so obvious that the defendant must have been aware of it. In addition, defendants Aldinger and Schoenholz were found to have violated §20(a) of the Securities Exchange Act of 1934 and were, therefore, additionally liable for all 17 statements, as persons who controlled Household in 2001 and 2002. A chart that contains the 17 false and misleading statements and that identifies the defendants responsible for each statement is attached as Exhibit 1.

The first false statement was made on March 23, 2001 and the class period continues until October 11, 2002. The plaintiffs are all persons or entities who purchased Household common stock during the Class Period (between March 23, 2001 and October 11, 2002, inclusive).

## **I. BACKGROUND**

During the Class Period, Household was a financial institution that, through its subsidiaries, provided a variety of loan products to consumers in the United States, the United Kingdom and Canada. Household had reported net income for 2001 of approximately \$1.9 billion and for 2002 of approximately \$1.55 billion. Household's primary business units were Consumer Lending, Mortgage Services, Retail Services, Credit Card Services and Auto Finance. Household's loan products included real estate secured loans, auto finance loans, MasterCard and Visa credit cards, private label credit cards, tax refund anticipation loans, retail installment sales finance loans and other types of unsecured loans, as well as credit and specialty insurance products. As of December 31, 2001, Household had approximately 32,000 employees and over 50 million active customer accounts.

Household's largest business unit, as of December 31, 2001, was Consumer Lending. Consumer Lending was one of the largest subprime home equity originators in the United States at the time, with approximately 1,400 branches located in 46 states, 3.2 million customer accounts, \$39.5 billion in managed receivables (U.S.) and 13,000 employees.

The Mortgage Services business unit purchased residential mortgage loans from a network of third party lenders. Mortgage Services, as of December 31, 2001, had approximately \$18.1 billion in managed receivables (U.S.), 240,000 customer accounts and 1,600 employees.

The Credit Card Services business unit included Household's MasterCard and Visa receivables in the United States. As of December 31, 2001, Credit Card Services had approximately \$17.2 billion in managed receivables (U.S.), 19.9 million customer accounts and 5,000 employees.

The Retail Services business unit was a provider of private label credit cards for third-party merchants, such as Best Buy or Levitz. As of December 31, 2001, Retail Services had approximately \$11.6 billion in managed receivables (U.S.), 9.9 million customer accounts and 2,200 employees.

The Auto Finance business unit purchased retail installment contracts from a network of car dealers and also originated and refinanced auto loans. As of December 31, 2001, Auto Finance was

the smallest of Household's business units with \$6.4 billion in managed receivables (U.S.) and 2,000 employees.

As of December 31, 2001, secured real estate loans constituted 44% of Household's loan portfolio, the MasterCard/Visa business was 17% of the portfolio, Private Label was 14% of the portfolio, personal non-credit card loans were 18% of the portfolio and auto loans were 6% of the portfolio.

## **II. SUMMARY OF THE FRAUD**

During the relevant time period, defendants embarked on a three-pronged fraud which enabled Household to falsely report "record" financial results, by: (1) engaging in predatory lending; (2) improperly "reaging" delinquent loans to "current" in order to conceal the true level of delinquencies and mask the credit quality of Household's loan portfolios as reported to investors; and (3) overstating net income by failing to record timely expenses associated with various credit card agreements in violation of Generally Accepted Accounting Principles ("GAAP").

### **A. Predatory Lending**

In 1999, company executives implemented an aggressive growth strategy in pursuit of a higher stock price. Defendants knew that if Household conveyed the appearance of growth to the market, the Company's stock price would dramatically increase. In 1999, Gilmer told his subordinates in Consumer Lending that Household's stock should trade at least "22 dollars a share" higher and if they could convince Wall Street of their growth prospects, Household's stock, then trading at \$39-\$40, would skyrocket to \$53-\$66. Gilmer said that failing to grow would have "unthinkable consequences."

In their efforts to grow at all costs, defendants hired Andrew Kahr, a predatory-lending specialist, who suggested that defendants implement certain "initiatives" designed to deceive customers. Defendants, working with Kahr, caused Household to undertake predatory practices, which drove loan originations up and resulted in unprecedented growth. By 2002, state Attorneys General concluded that Household was engaged in "widespread lending patterns and practices that

violate both state and federal law,” which were “national in scope.” The Attorneys General tied Household’s growth to its predatory practices:

[W]e note that several of the most insidiously deceptive sales practices which attracted regulatory attention to Household practices at the outset relate to products and practices initiated by Household in 1999. . . . [S]ince 1999, Household’s [loan] originations have nearly doubled. Almost assuredly, the misleading sales practices the states have identified have contributed to that growth.

In October 2002, Household settled the Attorneys General predatory-lending charges for \$484 million. Household got a sizeable discount via this agreement, having reaped \$3.2 billion in revenue from predatory practices between 1999 and the end of the second quarter of 2002 (June 30, 2002). In 1999, predatory lending practices contributed 28.4% of Household’s net income (that is \$421.7 million of \$1.486 billion in reported net income for that period); in 2000, predatory lending contributed 32.6% of Household’s net income (that is \$554.6 million of \$1.7 billion in reported net income for that period); in 2001, predatory lending contributed 36.2% of Household’s net income (that is \$696.3 million of \$1.923 billion in reported net income for that period); and 32.8% of Household’s net income for the first two quarters of 2002 (that is \$336.4 million of \$1.024 billion in reported net income for that period). Between 1999 and 2002, defendants engaged in the following predatory lending practices:

### **1. Effective or Equivalent Rates**

Household loan officers throughout the United States quoted “Effective” or “Equivalent Rates” to customers, which allowed Household loan officers to deceive customers with respect to the actual interest rates on their loans. Household loan officers would compare the customer’s current mortgage based on a 30-year amortization period to a Household mortgage paying their mortgage bi-weekly. Household loan officers showed the consumer a lower “effective” rate (terms such as “equivalent” rate and “comparable” rate were also used), and compared that “effective” rate to the consumer’s current higher rate. Often, Household loan officers used this technique to induce borrowers to refinance from a lower interest loan to a higher interest loan. For example, the effective rate presentation confused customers into thinking that the Household loan had a 7% interest rate when in reality their interest rate was 11% or higher. Household executives trained the

Company's loan officers in every one of the Company's six regions on the "effective" rate presentation.

As a group of Attorneys General from a number of states concluded: "Household misleads consumers by comparing the total interest the consumer will pay over a 30-year term of monthly payments, against the total interest a consumer would pay making bi-weekly payments. Household deceptively asserts that the effective interest rate is lower under the bi-weekly program because the loan is paid off sooner." The multi-state group of Attorneys General found that Household's use of the effective rate was widespread and violated applicable laws.

## **2. Insurance Packing**

Insurance packing is a practice whereby insurance is added to a loan, when the customer is either unaware of the insurance on the loan, or is told that the insurance is required to obtain the loan. During the relevant period, Household charged consumers for single premium credit insurance where the consumer had not requested it and was unaware of the sale until receipt of the monthly statement. Alternatively, Household falsely represented to consumers that insurance was required as a condition of the loan. Household encouraged its employees to engage in insurance packing by including sales of insurance as a component of the compensation plans for its account executives and managers. These predatory practices were widespread at Household and the multi-state group of Attorneys General found that they violated applicable laws.

## **3. Imposition of Excessive Points and Fees and Failure to Properly Disclose**

Household engaged in a number of practices in which it imposed excessive points and fees, which it improperly failed to disclose to borrowers. For example: (1) Household disclosed as "discount fees," charges that were not actually discount fees because the fees were not used to "buy down" the interest rate and Household did not inform consumers that paying a discount fee should result in a reduced interest rate; and (2) Household failed to adequately disclose these fees in the Good Faith Estimate by using an impermissibly wide dollar range for the proposed loan (sometimes from \$0 to \$8,000) that was misleading, especially when the fees it consistently imposed were either at the high end of the disclosed range or exceeded that range. Household also failed to provide

consumers who received high cost loans with certain disclosures required under state and/or federal law. These predatory practices were widespread at Household and the multi-state group of Attorneys General found that they violated applicable laws.

#### **4. Loan Splitting**

Household charged consumers illegal and unconscionable fees and interest by splitting what the consumer expected would be one loan, into two, distinct secured loans, the second of which was structured as an open-end revolving line of credit but had all of the characteristics of a standard closed-end home equity loan with an interest rate of over 20%. Household misrepresented that these high interest loans were open-end “revolving credit lines” when in fact: (a) close to the full amount of the line was drawn down immediately; (b) the loans were non-amortizing, making it nearly impossible for the consumer to pay down the credit line; and (c) neither Household nor the consumer reasonably anticipated subsequent extensions of credit. Therefore, these loans should have been subject to the Home Ownership Equity Protection Act (“HOEPA”) restrictions placed on closed-end loans. Whether the sham open-end loan is sold separately or in the context of a “split loan,” Household misled consumers into believing that these credit lines would be fully paid off if the minimum monthly payments were made, when in fact, a large balloon payment was required to pay off the loan at the end of the term. This predatory practice was widespread at Household and the multi-state group of Attorneys General found that it violated applicable laws.

#### **5. Prepayment Penalties**

Household did not adequately disclose the imposition of prepayment penalties on non-HOEPA loans, and violated HOEPA by imposing prepayment penalties on high cost loans. Household also imposed prepayment penalties on open-end credit and imposed prepayment penalties in violation of state law in states where the imposition of prepayment penalties was strictly forbidden. These predatory practices were widespread at Household and the multi-state group of Attorneys General found that they violated applicable laws.

## **6. Loan Flipping**

Household engaged in the practice of frequently refinancing – or flipping – one Household loan with another, imposing additional costs and fees with no benefit to the consumer. Additionally, Household engaged in the practice of selling a loan to a consumer with an existing loan where the new Household loan results in no benefit to the consumer. These predatory practices were widespread at Household and the multi-state group of Attorneys General found that they violated applicable laws.

## **7. Equity Stripping/Blocking the Back Door**

In refinancing loans, Household tacked unnecessary fees, points and insurance onto home loans, increasing costs and stripping equity from borrowers so that any equity the borrower had in the home was reduced even as the costs of the loans went up. In addition to stripping equity, Household's unnecessary fees, points, insurance and the improper imposition of prepayment penalties operated to "block the back door" and prevent borrowers from refinancing with other lenders at better terms. These predatory practices were widespread at Household and the multi-state group of Attorneys General found that they violated applicable laws.

In addition to engaging in widespread predatory lending practices, defendants intentionally destroyed evidence of their improper conduct. On March 12, 2001, Schoenholz instructed Household's Office of General Counsel to collect "all Andrew Kahr memoranda" and destroy them. Schoenholz later ordered the destruction of Kahr-related e-mails. Aldinger knew of Schoenholz's orders to destroy evidence of predatory lending. Similarly, in the summer of 2001, Gilmer ordered his Consumer Lending Unit to undertake a "purge" in all of the Company's branch offices and destroy evidence of predatory sales tactics.

During the Class Period, defendants falsely denied that Household was engaged in predatory lending. Although they had a duty to do so, defendants also failed to disclose to investors both that Household was engaged in widespread predatory lending and that Household's rapid growth was the result of its predatory practices. Defendants' failure to disclose this information rendered the disclosures in Household's Forms 10-K and 10-Q SEC filings, and its press releases, materially false

and misleading. In making false and misleading statements and failing to disclose important information about the Company's predatory lending practices, defendants knew either that they were presenting a risk of misleading investors or that the risk was so obvious that they had to have been aware of it.

**B. 2+ Delinquency/Re-Aging**

As Household grew, its stock price rose dramatically, but the company's growth was driven by predatory lending practices. This in turn increased the number of Household customers who could not pay their loans and thus were delinquent, which Household's executives then tried to mask by improper means. Defendants engaged in a concerted effort to conceal delinquent loans to distort the Company's 2+ delinquency numbers (the percentage of loans that were two or more months delinquent) and charge-off numbers. The 2+ number, which Household reported in both its press releases and its financial statements filed with the SEC, was a popular metric that investors used to gauge the quality of loan portfolios.

Defendants knew investors relied upon 2+ and charge-off statistics to evaluate Household's loan quality and stock price, and, in fact, the SEC called Household's 2+ statistics "one of the critical measures of Household's financial performance." Unsurprisingly, predatory loans were more likely to end up delinquent, as recipients were unlikely to pay back the loans on time, if at all. To mask the problem, defendants engaged in "loan quality concealment techniques" designed to make delinquent loans appear current, thereby improperly reducing the percentage of 2+ delinquent loans reported in Household's financial statements. Likewise, the "loan quality concealment techniques" delayed charge-offs, resulting in understated and misleading reported charge-off numbers.

More specifically, Household improperly used at least five techniques to conceal the actual delinquency and charge-off rates of its loan portfolio:

**1. Re-Aging and Restructuring Loans**

Household took loans that were either 2+ months delinquent or on the verge of falling into that 2+ category and reclassified those loans as current, non-delinquent loans, notwithstanding the fact that no payment had been received from the customer. Some restructures were automatic, with



no customer involvement at all. Household's re-aging and restructuring practices thereby reduced the number of loans that were reported as 2+ months delinquent in its press releases and financial statements. By doing so, defendants misled investors into believing that Household's loan portfolio was performing better than it truly was at the time.

## **2. Forbearance**

Household agreed to cease collection efforts on delinquent customers for a period of time in exchange for temporarily reduced payments, re-writes, or reduced payment. Household adjusted delinquent accounts that were in forbearance. As a result, Household's reported 2+ delinquency statistics were understated because accounts that were 2+ months delinquent when this forbearance was done would not show up in the company's press releases, Forms 10-Q and 10-K as being 2+ delinquent.

## **3. Skip-a-Pays**

Household implemented its "Skip-A-Pay" program, in which it unilaterally granted skip-a-pays by notifying customers, who were about to fall into the 2+ months delinquent category, that they did not have to make their scheduled monthly payment. In other words, the customer could skip a payment. Ultimately, the customer would have to make up this payment at the end of their loan payment. However, by granting these skip-a-pays, Household would prevent large numbers of loans from moving into the 2+ delinquent category, again misleading investors about the quality of Household's loan portfolio.

## **4. Re-Writes**

Household would take loans that were more than 2+ months delinquent, cancel the current loan and write a new loan to the customer. The "new" or "re-written" loan would then be shown as current, that is not 2+ months delinquent, even though it was effectively the same loan. Once again, Household used this technique to conceal the actual state of its loan portfolio.

## **5. Grace Periods**

Household granted its customers additional time to make their loan payment, called a grace period. As delinquent accounts became over 60 days past due, the company did not report them as

2+ delinquent until the additional grace period had expired. This practice resulted in Household understating its 2+ delinquencies in its Forms 10-K, 10-Q and press releases filed during the Class Period.

In December 2001, the market began questioning the quality of Household's loan portfolio and its re-aging policies. Defendants knew that investors were seeking more information regarding the Company's 2+ statistics and internal loan re-aging policies. Therefore, defendants decided to include information regarding Household's re-aging policies in the Company's 2001 Form 10-K, which was filed on March 13, 2002. At a prior proceeding in this case, Aldinger admitted that defendants made materially false representations about Household's re-aging policies in the Company's 2001 10-K, which Schoenholz and Aldinger signed. In particular, Household misrepresented its policies that permit the restructuring of delinquent loans (and the resetting of such loans to "current"), stating that re-ages were performed only "if a predetermined number of consecutive payments has been received and there is evidence that the reason for the delinquency has been cured." Contrary to defendants' representations regarding "curing the reason for delinquencies," Household actually re-aged loans automatically without any contact with the customer. Household also restructured numerous loans after receiving fewer than two payments and sometimes restructured delinquent loans without receiving any payment at all. Household's re-aging practices were not applied consistently, but were instead constantly changing to manage the number of delinquent loans and charge-offs reported to investors. Household's re-aging practices obscured the Company's credit quality, making it appear much better than it actually was.

In March 2003, Household amended its 2001 Form 10-K to reflect the fact that it had made false statements with respect to re-aging at the time that document was originally filed with the SEC. The following chart demonstrates the corrections that Household was forced to make with respect to its disclosures about the Company's re-aging and restructuring practices:

ORIGINAL 10-K	AMENDED 10-K/A
“Our policies . . . permit reset of the contractual delinquency status of an account to current, subject to certain limits if a predetermined number of <u>consecutive payments</u> has been received.”	“We are amending our disclosures of our restructure policies to include the following disclosures:  In numerous instances Household accepts one or <u>zero payments</u> prior to resetting the delinquency status.”
“. . . and there is evidence that the reason for the delinquency has been cured.”	“In the case of automatic restructures, no prior contact is required with the customer to determine if the cause of the delinquency has been cured.”
No mention of any other variations of loan quality concealment techniques.	“The account management policies include:  Re-aging of accounts Forbearance agreements Extended payment plans Modification of arrangements Consumer credit counseling accommodations Loan rewrites Deferments”

Defendants also made materially false statements about their loan portfolio and re-aging policies at a December 2001 Goldman Sachs conference and again in April 2002 at Household’s annual Financial Relations Conference (“FRC”) for Wall Street analysts, supplying phony statistics regarding re-aging and its impact on Household’s loan portfolio.

On April 9, 2002, defendants held their annual FRC, which was attended by over 400 Wall Street analysts and members of the financial press. Gilmer described the annual FRC as Household’s opportunity to tell investors “what we were doing and how we were doing it” – an opportunity to share what was happening in the Company. Schoenholz made four related sets of false statements about Household’s re-aging policies and practices at the FRC. First, Schoenholz again lied about the Company’s policies being consistently applied and by claiming that Household required consecutive payments and determined that the reason for the delinquency had been cured before re-aging loans.

In addition, for the first time, Household provided information regarding the percentage of its loan portfolio that had been re-aged and regarding re-age recidivism rates within the portfolio.

These statements were false. For example, Schoenholz stated that only 4.3% (\$4.028 billion) of Household's loan portfolio had been re-aged multiple times. In fact, 7.5% (\$7.025 billion) of Household's loan portfolio had been re-aged multiple times. Moreover, defendants tried to assuage investor concerns about re-aging by presenting statistics designed to show that once an account was re-aged and Household had helped a customer past "a bump in the road," the account was rarely re-aged again or charged off. Schoenholz provided "recidivism statistics by product" at the FRC. The recidivism statistics provided by Schoenholz, however, were materially false. For example, Schoenholz stated that only 13.1% of secured real estate loans had become 2+ delinquent or charged off within one year of being re-aged. In fact, Household did not count loans that had been re-aged again in these statistics. In actuality, 53.9% of Household's secured real estate loans were 2+ delinquent or charged-off within a year of re-aging. Schoenholz's statistics for each of the loan categories were similarly false. At a prior proceeding, Schoenholz denied knowingly making false statements at the FRC, claiming it was a "mistake." However, Schoenholz was forced to admit at the prior proceeding that he knew within a few weeks of the FRC that he had given false information to the assembled financial press – yet he did nothing to correct his alleged "mistake."

Finally, Schoenholz also lied at the FRC by claiming that Household's collections department employees received commissions only for obtaining actual payments from delinquent customers. In fact, Household's collections employees were given bonus commissions simply for finding a way to move a loan from 2+ to current, regardless of whether the customer made any payments. Household employees claimed that the Company's collections staff's reliance on re-aging was akin to a heroin addiction.

Defendants were motivated to lie about Household's loan portfolio because they were trying to sell the Company to Wells Fargo. As part of the potential transaction, in 2001-2002, Wells Fargo was provided with access to non-public information regarding Household. Wells Fargo determined that Household's "extensive re-aging of delinquent accounts delayed loss recognition and produced a 'bubble' of latent credit losses." Wells Fargo's due diligence team also noted "major systemic issues in [Household's] policies and procedures" and noted that Household's re-aging policies were

“aggressive.” Wells Fargo determined that Household was using re-aging and write-off policies to mask the true run rate of its losses and, in discussing Household’s policies, concluded “it is hard to imagine that they are not also being employed to boost earnings.” After concluding their due diligence, Wells Fargo decided not to acquire Household. Ultimately, defendants sold the Company to HSBC after the Class Period in late 2002-2003 for less than half of the price discussed by Household and Wells Fargo in the spring of 2002. Had the deal with Wells Fargo gone through, Aldinger, Gilmer, and Schoenholz would have collected as much as \$150 million in cash distributions and parachute payments.

### **C. The Credit Card Restatement**

Defendants also falsified their financial statements by improperly recording revenue and expenses in connection with four credit-card agreements – overstating Household’s net income by \$386,000,000. In August 2002, Household conceded its accounting for these transactions violated GAAP, and restated its financial statements.

Specifically, defendants improperly recorded revenue and expenses in connection with certain agreements with General Motors, the AFL-CIO, Union Privilege and a marketing company called Kessler. Defendants’ improper accounting with respect to these contracts caused the Company’s net income to be higher than it would have been had the Company complied with GAAP between 1999-2002. On August 14, 2002, Household conceded that its accounting for these transactions failed to comply with GAAP and restated its previously issued financial statements. Household conceded that its reported net income between 1999 and Q2 2002 was overstated by \$386,000,000. In certain quarters during this period, Household’s net income was overstated by over 6% due to this improper accounting (Q1 2000 – 6.1%; Q1 2001 – 6.5%). Defendants were warned about their accounting with respect to certain of these contracts (GM and Union Privilege) by the Office of the Comptroller of the Currency in 1998, but continued the improper accounting despite the warning. Indeed, defendants would not have met their bonus targets without this restated net income. None of the defendants refunded their bonus monies after the restatement correcting the Company’s net income.

#### **D. Household's Stock Price**

Between the summers of 1999 and 2001, Household's stock rose from around \$40 per share to the mid \$60s, and by July of 2001 was trading as high as \$69. But the reality of defendants' fraud eventually caught up with its stock price. The truth about defendants' predatory lending and re-aging practices began leaking into the market on November 15, 2001 when California sued Household for overcharging customers and Household claimed it was an isolated issue, and continued in December 2001 when an article was published questioning the Company's accounting practices with respect to its loan portfolio. News that the Washington Attorney General ("DFI") was investigating Household for its lending practices also began leaking into the market. Household eventually obtained a court order in April/May 2002 sealing a report from the Washington DFI, but its damning contents leaked into the market later in 2002 until its full contents were disclosed at the end of August 2002.

Household claimed its problems were limited to one branch office, but later disclosures confirmed the practices were national in scope. In 2002, information also began to leak out that Household would have to pay a huge fine and refund money to states for its predatory lending practices. The plaintiffs proved at the prior proceeding that Household's share price declined after the truth came out. Despite defendants' continuing denials, the leakage of truthful information and disclosures caused inflation to dissipate from Household's stock price from November 15, 2001 to October 11, 2002 (the "Leakage Period"). The Leakage Period culminated when Household announced a \$484 million settlement of the multi-state Attorneys General investigation on October 11, 2002. By October 2002, Household's stock price had fallen *below* the level it traded at before defendants' scheme began. In fact, between the filing of California's suit on November 15, 2001, and the multi-state settlement on October 11, 2002, Household's stock dropped 54%, from \$60.90 to \$28.20. Comparatively, declines in the S&P 500 Index (25%) and the peer group to which Household compared itself, the S&P Financials index (21%), were much less during this period.

At a prior proceeding, plaintiffs also introduced e-mails and reports from Household executives attributing the stock's decline to the fraud-related disclosures, and the record contains

various reports from market analysts primarily focused on this information. In addition, other evidence loosely corroborates the inflation figure produced by the leakage model (\$23.94). For example, when Household embarked on its aggressive growth strategy, Gary Gilmer suggested that the stock price could increase by “over 22 dollars a share.”

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# EXHIBIT 1



**EXHIBIT 1**  
**LIST OF FALSE OR MISLEADING STATEMENTS OR OMISSIONS**

<b>False Stmt No.</b>	<b>Date</b>	<b>Document Title</b>	<b>Responsible Defendants</b>	<b>State of Mind</b>	<b>Statement</b>	<b>Reason(s) Why False</b>
14.	03/23/2001	<i>Origination News</i> article  Plaintiffs' Exhibit 1307	Household  Gilmer  Aldinger	Knowingly (Household & Aldinger)  Recklessly (Gilmer)	<i>Origination News</i> – March 23, 2001: “Gary Gilmer, president and chief executive of Household’s subsidiaries HFC and Beneficial said the company’s ‘position on predatory lending is perfectly clear. Unethical lending practices of any type are abhorrent to our company, our employees and most importantly our customers.’” [TEL 002334]	Predatory Lending
15.	03/28/2001	Household FY00 Report on Form 10-K  Defendants' Exhibit 851	Household  Schoenholz  Aldinger	Recklessly	Household FY00 Report on Form 10-K filed with the SEC on March 28, 2001 Household reported net income of 1.7 billion and E.P.S. of \$3.55 [HHT 0015623]: * * * “Our focus is to use risk-based pricing and effective collection efforts for each loan. We have a process which we believe gives us a reasonable basis for predicting the credit quality of new accounts. This process is based on our experience with numerous marketing, credit and risk management tests. We also believe that our frequent and early contact with delinquent customers is helpful in managing net credit losses.” [HHT 0015608] * * * “Delinquency and Chargeoffs: Our delinquency and net chargeoff ratios reflect, among other factors, changes in the mix of loans in our portfolio, the quality of our receivables, the average age of our loans, the success of our collection efforts and general economic conditions.”. . .  We track delinquency and chargeoff levels on both an owned and a managed basis. We apply the same credit and portfolio management procedures to both our owned and off-balance sheet portfolios. Our focus is to use risk-based pricing and effective collection efforts for each loan. We have a process which we believe gives us a reasonable basis for predicting the credit quality of new accounts. This process is based on our experience with numerous marketing, credit and risk management tests. We also believe that our frequent and early contact with delinquent customers is helpful in managing net credit losses.” [HHT 0015608] * * *	Predatory Lending  2+ Delinquency/ Re-Aging  Restatement

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False																																																																																										
					<div>CONSUMER TWO-MONTH-AND-OVER CONTRACTUAL DELINQUENCY RATIOS</div> <table><thead><tr><th></th><th colspan="4">2000 Quarter End</th><th colspan="4">1999 Quarter End</th></tr><tr><th></th><th>4</th><th>3</th><th>2</th><th>1</th><th>4</th><th>3</th><th>2</th><th>1</th></tr></thead><tbody><tr><td>Managed:</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Real estate secured</td><td>2.63%</td><td>2.77%</td><td>2.72%</td><td>2.99%</td><td>3.27%</td><td>3.46%</td><td>3.29%</td><td>3.54%</td></tr><tr><td>Auto finance</td><td>2.55</td><td>2.19</td><td>1.99</td><td>1.52</td><td>2.43</td><td>2.26</td><td>1.87</td><td>1.74</td></tr><tr><td>MasterCard/Visa</td><td>3.49</td><td>3.48</td><td>3.14</td><td>3.06</td><td>2.78</td><td>3.10</td><td>3.11</td><td>3.61</td></tr><tr><td>Private label</td><td>5.48</td><td>5.67</td><td>5.77</td><td>5.94</td><td>5.97</td><td>6.66</td><td>6.62</td><td>6.37</td></tr><tr><td>Other unsecured</td><td>7.97</td><td>7.72</td><td>7.92</td><td>8.56</td><td>8.81</td><td>8.57</td><td>8.17</td><td>7.84</td></tr><tr><td>Total Managed</td><td>4.20%</td><td>4.21%</td><td>4.16%</td><td>4.43%</td><td>4.66%</td><td>4.89%</td><td>4.72%</td><td>4.81%</td></tr><tr><td>Total Owned</td><td>4.26%</td><td>4.29%</td><td>4.25%</td><td>4.58%</td><td>4.81%</td><td>5.24%</td><td>4.96%</td><td>5.04%</td></tr></tbody></table> <div>[HHT 0015609]</div>		2000 Quarter End				1999 Quarter End					4	3	2	1	4	3	2	1	Managed:									Real estate secured	2.63%	2.77%	2.72%	2.99%	3.27%	3.46%	3.29%	3.54%	Auto finance	2.55	2.19	1.99	1.52	2.43	2.26	1.87	1.74	MasterCard/Visa	3.49	3.48	3.14	3.06	2.78	3.10	3.11	3.61	Private label	5.48	5.67	5.77	5.94	5.97	6.66	6.62	6.37	Other unsecured	7.97	7.72	7.92	8.56	8.81	8.57	8.17	7.84	Total Managed	4.20%	4.21%	4.16%	4.43%	4.66%	4.89%	4.72%	4.81%	Total Owned	4.26%	4.29%	4.25%	4.58%	4.81%	5.24%	4.96%	5.04%	
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16.	04/18/2001	Household Press Release  Plaintiffs' Exhibit 504	Household Schoenholz  Aldinger	Recklessly	<div>April 18, 2001 Household Press Release entitled “Household International Reports First Quarter Results; 11th Consecutive Record Quarter”: Household “reported that earnings per share rose 17 percent to a first quarter record of \$.91 from \$.78 a year ago. Net income increased to \$431.8 million, up 16 percent from \$372.9 million in the first quarter of 2000. This quarter marked the 11th consecutive quarter of record results.” [HHS 02914121]</div> <div>* * *</div> <div>“Credit Quality and Loss Reserves At March 31, the managed delinquency ratio (60+days) was 4.25 percent, compared to 4.43 percent a year ago and 4.20 percent at December 31, 2000. The annualized managed net chargeoff ratio for the first quarter was 3.56 percent, a 44 basis points improvement from the year-ago quarter and up modestly from 3.41 percent in the prior quarter.” [HHS 02914123]</div>	<div>Predatory Lending</div> <div>2+ Delinquency/ Re-Aging</div> <div>Restatement</div>																																																																																										

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17.	05/09/2001	Household 10-Q  Plaintiffs' Exhibit 733	Household  Schoenholz  Aldinger	Recklessly	<p>Household 10-Q for 3/31/01 quarter ended: Household reported net income of \$431.8 million for the quarter ended March 31, 2001 and EPS of \$0.92 [HHS 03137911]:</p> <p>CREDIT QUALITY We track delinquency and chargeoff levels on a managed basis and we apply the same credit and portfolio management procedures as on our owned portfolio.</p> <p>Delinquency Two-Months-and-Over Contractual Delinquency (as a percent of consumer receivables):</p> <table><tr><td></td><td>March 31, 2001</td><td>December 31, 2000</td><td>September 30, 2000</td><td>June 30, 2000</td><td>March 31, 2000</td></tr><tr><td>Managed:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Real estate secured</td><td>2.61%</td><td>2.63%</td><td>2.77%</td><td>2.72%</td><td>2.99%</td></tr><tr><td>Auto finance</td><td>1.79</td><td>2.55</td><td>2.19</td><td>1.99</td><td>1.52</td></tr><tr><td>MasterCard/Visa</td><td>3.68</td><td>3.49</td><td>3.48</td><td>3.14</td><td>3.06</td></tr><tr><td>Private label</td><td>5.50</td><td>5.48</td><td>5.67</td><td>5.77</td><td>5.94</td></tr><tr><td>Other unsecured</td><td>8.37</td><td>7.97</td><td>7.72</td><td>7.92</td><td>8.56</td></tr><tr><td>Total managed</td><td>4.25%</td><td>4.20%</td><td>4.21%</td><td>4.16%</td><td>4.43%</td></tr><tr><td>Owned</td><td>4.36%</td><td>4.26%</td><td>4.29%</td><td>4.25%</td><td>4.58%</td></tr></table> <p>[HHS 03137930] * * *</p> <p>“Owned consumer two-months-and-over contractual delinquency as a percent of owned consumer receivables was 4.36 percent at March 31, 2001, compared with 4.26 percent at December 31, 2000 and 4.58 percent at March 31, 2000. The annualized consumer owned chargeoff ratio in the first quarter of 2001 was 3.12 percent, compared with 2.98 percent in the prior quarter and 3.53 percent in the year-ago quarter.</p> <p>Managed consumer two-months-and-over contractual delinquency as a percent of managed consumer receivables was 4.25 percent at March 31, 2001, compared with 4.20 percent at December 31, 2000 and 4.43 percent at March 31, 2000. The annualized consumer managed chargeoff ratio in the first quarter of 2001 was 3.56 percent, compared with 3.41 percent in the prior quarter and 4.00 percent in the year-ago quarter.” [HHS 03137924]</p>		March 31, 2001	December 31, 2000	September 30, 2000	June 30, 2000	March 31, 2000	Managed:						Real estate secured	2.61%	2.63%	2.77%	2.72%	2.99%	Auto finance	1.79	2.55	2.19	1.99	1.52	MasterCard/Visa	3.68	3.49	3.48	3.14	3.06	Private label	5.50	5.48	5.67	5.77	5.94	Other unsecured	8.37	7.97	7.72	7.92	8.56	Total managed	4.25%	4.20%	4.21%	4.16%	4.43%	Owned	4.36%	4.26%	4.29%	4.25%	4.58%	2+ Delinquency/ Re-Aging  Restatement
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18.	07/18/2001	Household Press Release  Plaintiffs' Exhibit 503	Household  Schoenholz  Aldinger	Recklessly	<p>July 18, 2001 Household Press Release entitled "Household International Reports Second Quarter Results; 12th Consecutive Record Quarter": Household "reported record earnings per share of \$.93, up 16 percent from a year ago. Net income rose 14 percent, to \$439.0 million, from \$383.9 million for the second quarter of 2000." . . .</p> <p>"We had a terrific quarter – our 12th consecutive quarter of record results. Given the softening economic environment, I am particularly pleased with our ability to consistently deliver strong, quality earnings. Results for the quarter were excellent. . . . We enjoyed strong receivable and revenue growth compared to a year ago, with all of our businesses performing well. In addition, delinquency was stable in the quarter." [HHS 02914097]</p> <p>"Credit Quality and Loss Reserves At June 30th, the managed delinquency ratio (60+days) was 4.27 percent, stable with 4.25 percent in the first quarter. The managed delinquency ratio a year ago was 4.16 percent. The annualized managed net chargeoff ratio for the second quarter was 3.71 percent, essentially unchanged from the year-ago quarter and up modestly from 3.56 percent in the first quarter." [HHS 02914098]</p>	<p>Predatory Lending</p> <p>2+ Delinquency/ Re-Aging</p> <p>Restatement</p>
20.	08/10/2001	Household 10-Q  Plaintiffs' Exhibit 6	Household  Schoenholz  Aldinger	Recklessly	<p>Household 10-Q for 6/30/01 quarter ended: Household reported net income of \$439 million for the quarter ended June 30, 2001 and EPS of \$0.94 [AA 062721]:</p> <p>CREDIT QUALITY We track delinquency and chargeoff levels on a managed basis and we apply the same credit and portfolio management procedures as on our owned portfolio. [AA 062738]</p>	<p>2+ Delinquency/ Re-Aging</p> <p>Restatement</p>

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					<div>Delinquency</div> <div>Two-Months-and-Over Contractual Delinquency (as a percent of consumer receivables):</div> <table><tr><td></td><td>June 30, 2001</td><td>March 31, 2001</td><td>December 31, 2000</td><td>September 30, 2000</td><td>June 30, 2000</td></tr><tr><td>Managed:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Real estate secured</td><td>2.63%</td><td>2.61%</td><td>2.63%</td><td>2.77%</td><td>2.72%</td></tr><tr><td>Auto finance</td><td>2.09</td><td>1.79</td><td>2.55</td><td>2.19</td><td>1.99</td></tr><tr><td>MasterCard/Visa</td><td>3.60</td><td>3.68</td><td>3.49</td><td>3.48</td><td>3.14</td></tr><tr><td>Private label</td><td>5.66</td><td>5.50</td><td>5.48</td><td>5.67</td><td>5.77</td></tr><tr><td>Other unsecured</td><td>8.43</td><td>8.37</td><td>7.97</td><td>7.72</td><td>7.92</td></tr><tr><td>Total managed</td><td>4.27%</td><td>4.25%</td><td>4.20%</td><td>4.21%</td><td>4.16%</td></tr><tr><td>Owned</td><td>4.48%</td><td>4.36%</td><td>4.26%</td><td>4.29%</td><td>4.25%</td></tr></table> <div>[AA 062739]</div> <div>* * *</div> <div>”Owned consumer two-months-and-over contractual delinquency as a percent of owned consumer receivables was 4.48 percent at June 30, 2001, compared with 4.36 percent at March 31, 2001 and 4.25 percent at June 30, 2000. The annualized consumer owned chargeoff ratio in the second quarter of 2001 was 3.26 percent, compared with 3.12 percent in the prior quarter and 3.27 percent in the year-ago quarter.</div> <div>Managed consumer two-months-and-over contractual delinquency as a percent of managed consumer receivables was 4.27 percent at June 30, 2001, compared with 4.25 percent at March 31, 2001 and 4.16 percent at June 30, 2000. The annualized consumer managed chargeoff ratio in the second quarter of 2001 was 3.71 percent, compared with 3.56 percent in the prior quarter and 3.74 percent in the year-ago quarter.” [AA 062733]</div>		June 30, 2001	March 31, 2001	December 31, 2000	September 30, 2000	June 30, 2000	Managed:						Real estate secured	2.63%	2.61%	2.63%	2.77%	2.72%	Auto finance	2.09	1.79	2.55	2.19	1.99	MasterCard/Visa	3.60	3.68	3.49	3.48	3.14	Private label	5.66	5.50	5.48	5.67	5.77	Other unsecured	8.43	8.37	7.97	7.72	7.92	Total managed	4.27%	4.25%	4.20%	4.21%	4.16%	Owned	4.48%	4.36%	4.26%	4.29%	4.25%	
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21.	10/17/2001	Household Press Release  Plaintiffs’ Exhibit 978	Household Schoenholz  Aldinger	Recklessly	October 17, 2001 Household Press Release entitled “Household Reports Highest Quarterly Net Income in Its 123-Year History”: Household “reported earnings per share of \$1.07 rose 14 percent from \$.94 the prior year. Net income increased 12 percent, to \$504 million, from \$451 million in the third quarter of 2000.” [HHS 03453676]	Predatory Lending  2+ Delinquency/ Re-Aging  Restatement																																																						

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					“Credit Quality and Loss Reserves At September 30th, the managed delinquency ratio (60+ days) was 4.43 percent, compared to 4.27 percent in the second quarter and 4.21 percent a year ago. The sequential increase was across all products and was well within company expectations. The annualized managed net chargeoff ratio for the third quarter was 3.74 percent, up slightly from 3.71 percent in the second quarter. The managed net chargeoff ratio was 3.47 percent in the prior-year quarter.” [HHS 03453677]																																																							
22.	11/14/2001	Household 10-Q  Plaintiffs’ Exhibit 707	Household  Schoenholz  Aldinger	Recklessly	Household 10-Q for quarter ended 9/30/01: Household reported net income of \$503.8 million for the quarter ended September 30, 2001 and EPS of \$1.09 [HHS 03111409]:  CREDIT QUALITY We track delinquency and chargeoff levels on a managed basis and we apply the same credit and portfolio management procedures as on our owned portfolio. [HHS 03111425] Delinquency Two-Months-and-Over Contractual Delinquency (as a percent of consumer receivables): <table><tr><td></td><td>September 30, 2001</td><td>June 30, 2001</td><td>March 31, 2001</td><td>December 30, 2000</td><td>September 30, 2000</td></tr><tr><td>Managed:</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Real estate secured</td><td>2.74%</td><td>2.63%</td><td>2.61%</td><td>2.63%</td><td>2.77%</td></tr><tr><td>Auto finance</td><td>2.54</td><td>2.09</td><td>1.79</td><td>2.55</td><td>2.19</td></tr><tr><td>MasterCard/Visa</td><td>3.91</td><td>3.60</td><td>3.68</td><td>3.49</td><td>3.48</td></tr><tr><td>Private label</td><td>5.88</td><td>5.66</td><td>5.50</td><td>5.48</td><td>5.67</td></tr><tr><td>Other unsecured</td><td>8.51</td><td>8.43</td><td>8.37</td><td>7.97</td><td>7.72</td></tr><tr><td>Total managed</td><td>4.43%</td><td>4.27%</td><td>4.25%</td><td>4.20%</td><td>4.21%</td></tr><tr><td>Owned</td><td>4.58%</td><td>4.48%</td><td>4.36%</td><td>4.26%</td><td>4.29%</td></tr></table> [HHS 03111426] * * *  “Owned consumer two-months-and-over contractual delinquency as a percent of owned consumer receivables was 4.58 percent at September 30, 2001, compared with 4.48 percent at June 30, 2001 and 4.29 percent at September 30, 2000. The annualized total consumer owned chargeoff ratio in the third quarter of 2001 was 3.43 percent, compared with 3.26 percent in the prior quarter and 3.01 percent in the year-ago quarter.		September 30, 2001	June 30, 2001	March 31, 2001	December 30, 2000	September 30, 2000	Managed:						Real estate secured	2.74%	2.63%	2.61%	2.63%	2.77%	Auto finance	2.54	2.09	1.79	2.55	2.19	MasterCard/Visa	3.91	3.60	3.68	3.49	3.48	Private label	5.88	5.66	5.50	5.48	5.67	Other unsecured	8.51	8.43	8.37	7.97	7.72	Total managed	4.43%	4.27%	4.25%	4.20%	4.21%	Owned	4.58%	4.48%	4.36%	4.26%	4.29%	2+ Delinquency/ Re-Aging  Restatement
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					<p>Managed consumer two-months-and-over contractual delinquency as a percent of managed consumer receivables was 4.43 percent at September 30, 2001, compared with 4.27 percent at June 30, 2001 and 4.21 percent at September 31, 2000. The annualized total consumer managed chargeoff ratio in the third quarter of 2001 was 3.74 percent, compared with 3.71 percent in the prior quarter and 3.47 percent in the year-ago quarter.” [HHS 03111420]</p> <p style="text-align: center;">* * *</p> <p>“Managed delinquency as a percent of managed consumer receivables increased modestly over both the previous and prior-year quarters. Compared to the previous quarter, all products reported higher delinquencies principally as the result of a weakening economy.” [HHS 03111426]</p>	
23.	12/04/2001	Goldman Sachs Presentation  Plaintiffs’ Exhibit 1248	Household  Aldinger	Recklessly	<p>December 4, 2001 Goldman Sachs Presentation: defendants made false statements regarding Household’s accounting practices, including reaging and restructuring.</p> <p style="text-align: center;">* * *</p> <p>“Charge off policies are appropriate for our target market and result in proper loss recognition” (PFG000158)</p> <p>“All policies have been consistently applied and realistically report results” (PFG000158)</p> <p>“Why are Household’s Credit Losses Better” - better credit skills (PFG000152)</p>	2+ Delinquency/ Re-Aging
24.	01/16/2002	Household Press Release  Plaintiffs’ Exhibit 706	Household  Schoenholz  Aldinger	Recklessly	<p>January 16, 2002 Household Press Release entitled “Household Reports Record Quarterly and Full-Year Net Income”: Household “reported fourth quarter earnings per share of \$1.17, its fourteenth consecutive record quarter. Fourth quarter earnings per share rose 14 percent from \$1.03 the prior year. Net income in the fourth quarter increased 11 percent, to an all-time quarterly record of \$549 million. For the full year, Household reported earnings per share of \$4.08, representing a 15 percent increase from \$3.55 in 2000. Net income for 2001 totaled \$1.9 billion, also an all-time high, 13 percent above \$1.7 billion earned in 2000.”</p> <p>“Household’s fourth quarter results were simply outstanding . . . demonstrating the tremendous strength and earnings power of the Household franchise. Receivable and revenue growth exceeded our expectations while credit indicators weakened only modestly in a tough economic</p>	<p>Predatory Lending</p> <p>2+ Delinquency/ Re-Aging</p> <p>Restatement</p>

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False
					environment. . . . In 2001, we demonstrated that our business model generates superior results in a weak economy as well as in the strong economic periods of previous years. Exceptional revenue growth of 18 percent more than offset the increases in credit losses during the year.” [HHS 03110403 – HHS 03110404] <div>* * *</div> “Credit Quality and Loss Reserves At December 31st, the managed delinquency ratio (60+days) was 4.46 percent, up 3 basis points from 4.43 percent in the third quarter. The managed delinquency ratio was 4.20 percent a year ago. The annualized managed net chargeoff ratio for the fourth quarter was 3.90 percent, up 16 basis points from 3.74 percent in the third quarter. The managed net chargeoff ratio in the year-ago quarter was 3.41 percent.” [HHS 03110405]	
27.	03/13/2002	Household FY01 Report on Form 10-K  Defendants’ Exhibit 852	Household Schoenholz  Aldinger	Recklessly	Household FY01 Report on Form 10-K filed with the SEC on March 13, 2002 Household reported Net Income of \$1.923 billion in 2001, and E.P.S. of \$4.13 [HHT 0015815 – HHT 0015816]:  Household International, Inc. and Subsidiaries CREDIT QUALITY STATISTICS – OWNED BASIS All dollar amounts are stated in millions. 2001 2000 1999 1998 1997 At December 31, unless otherwise indicated. Owned Two-Month-and-Over Contractual Delinquency Ratios Real estate secured 2.63% 2.58% 3.10% 3.95% 3.66% Auto finance 2.92 2.46 2.02 2.90 1.48 MasterCard/Visa 5.67 4.90 3.59 5.09 3.55 Private label 5.99 5.60 6.09 6.03 5.60 Personal non-credit card 9.04 7.99 9.06 8.24 7.55 Total consumer 4.53% 4.26% 4.82% 5.31% 4.87% [HHT 0015809] <div>* * *</div>	Predatory Lending  2+ Delinquency/ Re-Aging  Restatement



False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False
					<div>Household International, Inc. and Subsidiaries</div> <div>CREDIT QUALITY STATISTICS – MANAGED BASIS</div> <div>All dollar amounts are stated in millions.</div> <div>20012000199919981997</div> <div>At December 31, unless otherwise indicated.</div> <div>Managed Two-Month-and-Over Contractual Delinquency Ratios</div> <div>Real estate secured2.68%2.63%3.27%3.67%3.69%</div> <div>Auto finance3.162.552.432.292.09</div> <div>MasterCard/Visa4.103.492.783.753.10</div> <div>Private label5.485.485.976.205.81</div> <div>Personal non-credit card8.877.978.817.947.81</div> <div>Total consumer4.46%4.20%4.66%4.90%4.64%</div> <div>[HHT 0015810]</div> <div>* * *</div> <div>“Management has long recognized its responsibility for conducting the company’s affairs in a manner which is responsive to the interest of employees, shareholders, investors and society in general. This responsibility is included in the statement of policy on ethical standards which provides that the company will fully comply with laws, rules and regulations of every community in which it operates and adhere to the highest ethical standards. Officers, employees and agents of the company are expected and directed to manage the business of the company with complete honesty, candor and integrity.” [HHT 0015848]</div> <div>* * *</div> <div>“Our credit and portfolio management procedures focus on risk-based pricing and effective collection efforts for each loan. We have a process which we believe gives us a reasonable basis for predicting the credit quality of new accounts. This process is based on our experience with numerous marketing, credit and risk management tests. We also believe that our frequent and early contact with delinquent customers, as well as policies designed to manage customer relationships, such as reaging delinquent accounts to current in specific situations, are helpful in maximizing customer collections. . . . As a result, charge-off and delinquency performance has been well within our expectations.” [HHT 0015797]</div> <div>* * *</div>	

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False
					<p>“We believe our policies are responsive to the specific needs of the customer segment we serve. . . . <i>Our policies have been consistently applied and there have been no significant changes to any of our policies during any of the periods reported.</i> Our loss reserve estimates consider our charge-off policies to ensure appropriate reserves exist for products with longer charge-off lives. We believe our charge-off policies are appropriate and result in proper loss recognition.” [HHT 0015798]</p> <p style="text-align: center;">* * *</p> <p>“Our policies for consumer receivables permit reset of the contractual delinquency status of an account to current, subject to certain limits, if a predetermined number of consecutive payments has been received and there is evidence that the reason for the delinquency has been cured. Such reaging policies vary by product and are designed to manage customer relationship and maximize collections.” [HHT 0015798]</p>	
28.	04/09/2002	Household Financial Relations Conference  Plaintiffs’ Exhibit 135	Household Schoenholz	Recklessly	<p>April 9, 2002 Financial Relations Conference:</p> <ul style="list-style-type: none"> <li>• Credit Quality Trend – Manageable, Modest Increases [chart on HHS 01883530]</li> <li>• Credit Policies – Overview – In some cases charge-off policy is longer than bank policy to optimize customer management. [HHS 01883554]</li> <li>• Reage Policies – Overview <ul style="list-style-type: none"> <li>• Reage policies are an inherent part of value proposition for our customers for which they pay above bank prices</li> <li>• Not intended to defer credit loss recognition or to overstate net income</li> <li>• Policies have been consistently applied and are appropriate for each product [HHS 01883557]</li> </ul> </li> <li>• Credit Policies – Personal Non-Credit Card <ul style="list-style-type: none"> <li>• Restructures <ul style="list-style-type: none"> <li>• If an account is ever 90+, lifetime limit of 4 restructures allowed [HHS 01883579]</li> </ul> </li> </ul> </li> </ul> <p>Defendants included information regarding Household’s reage portfolio in a number of charts included in Plaintiffs’ Exhibit 135 – the charts are located at HHS01883560, HHS01883561, HHS01883562, HHS01883564, HHS01883565, HHS01883566, and HHS01883567.</p>	2+ Delinquency/ Re-Aging

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False
29.	04/17/2002	Household Press Release  Plaintiffs' Exhibit 635	Household  Schoenholz  Aldinger	Recklessly	<p>April 17, 2002 Household Press Release entitled "Household Reports Record First Quarter Net Income": Household "reported first quarter earnings per share of \$1.09, its fifteenth consecutive record quarter. First quarter earnings per share rose 20 percent from \$.91 the prior year. Net income in the first quarter increased 18 percent, to a record \$511 million."</p> <p>"Household turned in a very strong first quarter. . . . In addition to delivering record results this quarter, we strongly added to our capital and reserve levels and further enhanced liquidity. We remain committed to maintaining a strong balance sheet and maximum financial flexibility."</p> <p>"Our credit quality performance was well within our expectations in light of the continued weakness in the economy. . . . We anticipate a very manageable credit environment for the remainder of the year." [HHS 02980361]</p> <p style="text-align: center;">* * *</p> <p>"Credit Quality and Loss Reserves At March 31st, the <i>managed basis</i> delinquency ratio (60+days) was 4.63 percent, up 17 basis points from 4.46 percent at year-end 2001 and up 38 basis points from 4.25 percent a year ago. The annualized <i>managed basis</i> net charge-off ratio for the first quarter of 4.09 percent increased 19 basis points from 3.90 percent in the fourth quarter of 2001. . . ."</p> <p>"The <i>owned basis</i> delinquency ratio at March 31st was 4.77 percent, compared to 4.53 percent at December 31st and 4.36 percent a year ago. The annualized <i>owned basis</i> charge-off ratio for the first quarter was 3.61 percent compared to 3.43 percent in the previous quarter and 3.12 percent a year ago." [HHS 02980363]</p>	Predatory Lending  2+ Delinquency/ Re-Aging  Restatement

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False																												
32.	05/10/2002	Household 10-Q  Plaintiffs’ Exhibit 232	Household  Schoenholz  Aldinger	Recklessly	Household 10-Q for quarter ended 3/31/2002. Household reported net income of \$511 million, and E.P.S of \$1.09 [HHS 02135167]  CREDIT QUALITY  Delinquency – Owned Basis Two-Months-and-Over Contractual Delinquency (as a percent of consumer receivables): <table><tr><td></td><td>March 31, 2002</td><td>December 31, 2001</td><td>March, 31 2001</td></tr><tr><td>Real estate secured</td><td>2.88%</td><td>2.63%</td><td>2.55%</td></tr><tr><td>Auto finance</td><td>2.04</td><td>2.92</td><td>1.74</td></tr><tr><td>MasterCard/Visa</td><td>6.54</td><td>5.67</td><td>5.02</td></tr><tr><td>Private label</td><td>6.33</td><td>5.99</td><td>5.62</td></tr><tr><td>Personal non-credit card</td><td>9.60</td><td>9.04</td><td>8.79</td></tr><tr><td>Total Owned</td><td>4.77%</td><td>4.53%</td><td>4.36%</td></tr></table> [HHS 02135187]		March 31, 2002	December 31, 2001	March, 31 2001	Real estate secured	2.88%	2.63%	2.55%	Auto finance	2.04	2.92	1.74	MasterCard/Visa	6.54	5.67	5.02	Private label	6.33	5.99	5.62	Personal non-credit card	9.60	9.04	8.79	Total Owned	4.77%	4.53%	4.36%	2+ Delinquency/ Re-Aging  Restatement
	March 31, 2002	December 31, 2001	March, 31 2001																															
Real estate secured	2.88%	2.63%	2.55%																															
Auto finance	2.04	2.92	1.74																															
MasterCard/Visa	6.54	5.67	5.02																															
Private label	6.33	5.99	5.62																															
Personal non-credit card	9.60	9.04	8.79																															
Total Owned	4.77%	4.53%	4.36%																															
36.	07/17/2002	Household Press Release  Plaintiffs’ Exhibit 788	Household  Schoenholz  Aldinger	Recklessly	July 17, 2002 Household Press Release entitled “Household Reports Record Second Quarter Results on Strong Receivables Growth”: Household “reported second quarter earnings per share increased 16 percent to \$1.08, from \$.93 the prior year. These results mark Household’s sixteenth consecutive record quarter. Second quarter net income increased 17 percent, to a record \$514 million.” <table><tr><td>*</td><td>*</td><td>*</td></tr></table> “Our results this quarter were fueled by ongoing strong demand for our loan products. . . . Growth this quarter was strong, while we have maintained our conservative underwriting criteria. . . .” [HHS 03195884] <table><tr><td>*</td><td>*</td><td>*</td></tr></table> “Credit Quality and Loss Reserves At June 30th, the <i>managed basis</i> delinquency ratio (60+days) was 4.53 percent, down 10 basis points from 4.63 percent at the end of March, led by improvement in the MasterCard/Visa portfolio. The managed basis delinquency ratio was 4.27 percent a year ago. The annualized	*	*	*	*	*	*	Predatory Lending  2+ Delinquency/ Re-Aging  Restatement																						
*	*	*																																
*	*	*																																

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False																												
					<i>managed basis</i> netcharge-off ratio for the second quarter of 4.26 percent was 17 basis points higher than the first quarter and 55 basis points higher than a year ago.”  “The <i>owned basis</i> delinquency ratio at June 30th was 4.61 percent, compared to 4.77 percent at March 31st and 4.48 percent a year ago. The annualized <i>owned basis</i> net charge-off ratio for the second quarter was 3.76 percent compared to 3.61 percent in the previous quarter and 3.26 a year ago.” [HHS 03195886]																													
37.	08/14/2002	Household Press Release  Plaintiffs’ Exhibit 227	Household  Schoenholz  Aldinger	Recklessly	August 14, 2002 Household Press Release entitled “Household International Certifies Accuracy of SEC filings in 2002”: “Household’s results for the year-to-date have been fueled by strong demand for our loan products throughout our businesses. Our loan underwriting approach continues to be conservative in these times of economic uncertainty, and we remain committed to strong reserve and capital levels.” [HHS 02133695]	Predatory Lending																												
38.	08/14/2002	Household 10-Q  Defendants’ Exhibit 874	Household  Schoenholz  Aldinger	Recklessly	Household 10-Q for quarter-ended 6/30/2002 issued on 8/14/2002: Household reported net income of \$507 million and E.P.S. of \$1.08 [HHT 0017112]  CREDIT QUALITY Delinquency – Owned Basis Two-Months-and-Over Contractual Delinquency (as a percent of consumer receivables): <table><tr><td></td><td>June 30, 2002</td><td>March 31, 2002</td><td>June 30, 2001</td></tr><tr><td>Real estate secured</td><td>2.78%</td><td>2.88%</td><td>2.59%</td></tr><tr><td>Auto finance</td><td>2.99</td><td>2.04</td><td>2.35</td></tr><tr><td>MasterCard/Visa</td><td>6.13</td><td>6.54</td><td>4.80</td></tr><tr><td>Private label</td><td>6.19</td><td>6.33</td><td>6.54</td></tr><tr><td>Personal non-credit card</td><td>9.12</td><td>9.60</td><td>8.79</td></tr><tr><td>Total Owned</td><td>4.61%</td><td>4.77%</td><td>4.48%</td></tr></table> [HHT 0017131]  * * *		June 30, 2002	March 31, 2002	June 30, 2001	Real estate secured	2.78%	2.88%	2.59%	Auto finance	2.99	2.04	2.35	MasterCard/Visa	6.13	6.54	4.80	Private label	6.19	6.33	6.54	Personal non-credit card	9.12	9.60	8.79	Total Owned	4.61%	4.77%	4.48%	2+ Delinquency/ Re-Aging  Restatement
	June 30, 2002	March 31, 2002	June 30, 2001																															
Real estate secured	2.78%	2.88%	2.59%																															
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Total Owned	4.61%	4.77%	4.48%																															

False Stmt No.	Date	Document Title	Responsible Defendants	State of Mind	Statement	Reason(s) Why False
					<p>“Our credit policies for consumer loans permit the reset of the contractual delinquency status of an account to current, subject to certain limits, if a predetermined number of consecutive payments has been received and there is evidence that the reason for the delinquency has been cured. Such reaging policies vary by product and are designed to manage customer relationship and ensure maximum collections.” [HHT 0017132]</p> <p style="text-align: center;">* * *</p> <p>Household reiterated this disclosure in its Form 10-K/A for fiscal year 2001, filed with the SEC on August 27, 2002.</p>	

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**[PROPOSED] JOINT JURY QUESTIONNAIRE**

**[Exhibit B-4 to [Proposed] Final Pretrial Order]**

**JUROR NUMBER** \_\_\_\_\_

### JURY SCREENING QUESTIONNAIRE

This questionnaire relates to a civil case alleging violations of the federal securities laws. You have been selected as part of the pool of people from which the jury will be selected. These questions will help the parties and the Court select a fair and impartial jury that is available to serve during the time required. The Court and the parties will keep all of your answers confidential.

Because this questionnaire is part of the jury selection process, the questionnaire is to be answered under oath to tell the truth. Respond to each question as fully and completely as possible. Your complete candor and honesty is necessary so that both sides will have a meaningful opportunity to select a jury. Your cooperation is of vital importance.

There are no “right” or “wrong” answers. Please fill out the entire questionnaire. Do not leave any questions blank. Please write or print your answers as legibly as possible using blue or black ink.

This is a class action. The plaintiffs in this case are all persons or entities who purchased the common stock of Household International, Inc. (“Household”) during the period March 23, 2001 through October 11, 2002. The defendants are Household, William Aldinger, David Schoenholz and Gary Gilmer. The plaintiffs have brought claims against the four defendants under the federal securities laws that govern the buying and selling of securities such as the common stock issued by Household. The plaintiffs purchased shares of Household common stock between March 23, 2001 and October 11, 2002. In prior proceedings in this case, it was determined that each of the defendants knowingly or recklessly made one or more of 17 statements that were false or misleading. In this proceeding, three issues will be addressed regarding those 17 misstatements: loss causation, damages and the percentage of proportionate responsibility for plaintiffs’ economic loss that is attributable to each of the defendants.

Please answer all questions below, unless instructed to skip a question, and sign at the end of the questionnaire. If you do not have enough space to fully respond to a particular question, you may use the extra space provided on the last page. Please be sure to write the number of the question for which you are providing additional information. You may attach additional pages if needed. Do



**JUROR NUMBER**\_\_\_\_\_

not write on the back of any page. **Do not speak to anyone or do any research of any kind, including internet searches, regarding any of the questions, people or issues listed in this questionnaire.**

**JUROR NUMBER** \_\_\_\_\_Your Full Name (Print):  
\_\_\_\_\_

1. Where were you born? (Please list city, state, country)  
\_\_\_\_\_
2. Where did you grow up?  
\_\_\_\_\_
3. In what town within Illinois do you reside, and how long have you lived there? (Do not list your address.) \_\_\_\_\_
4. What is your employment status?  

<input type="checkbox"/> Currently employed full-time <input type="checkbox"/> Full-time homemaker <input type="checkbox"/> Full-time student <input type="checkbox"/> Unemployed <input type="checkbox"/> Disabled since _____ (date)	<input type="checkbox"/> Currently employed part-time <input type="checkbox"/> Working more than one job <input type="checkbox"/> Part-time student <input type="checkbox"/> Retired since _____ (date) <input type="checkbox"/> Other (specify: _____)
--	---
5. If you are currently employed, please state:
  - (a) Employer: \_\_\_\_\_
  - (b) Job title or occupation: \_\_\_\_\_
  - (c) Place of employment: \_\_\_\_\_
  - (d) Length of employment: \_\_\_\_\_
  - (e) Job duties or responsibilities: \_\_\_\_\_  
\_\_\_\_\_
  - (f) Do you supervise others? Yes \_\_\_\_\_ No \_\_\_\_\_
6. What other occupations or types of work and employers have you had in the past ten years? If retired, indicate your occupations prior to retirement. Briefly describe each job:

Dates	Occupation and Employer	Job Description

**JUROR NUMBER** \_\_\_\_\_

7. If you know, is the company where you work now publicly traded on any stock exchange?  
\_\_\_\_\_

8. What is your marital status? \_\_\_\_\_

(a) If married:

- How long have you been married? \_\_\_\_\_
- What is your spouse's occupation and the name of your spouse's employer (if retired or unemployed, what was their most recent occupation and the name of their employer)? \_\_\_\_\_  
\_\_\_\_\_

(b) If divorced, widowed, or separated:

- How long have you been divorced/ widowed/ separated? \_\_\_\_\_
- What was your spouse's occupation and employer? \_\_\_\_\_  
\_\_\_\_\_

(c) If single:

- Are there any other adults living in your household? \_\_\_\_\_
- What is their occupation(s)? \_\_\_\_\_

9. Do you have any children over age 18? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

(a) Are any of those children living at home? \_\_\_\_\_

(b) How regularly do you see them? \_\_\_\_\_

(c) For those children with full-time jobs, how frequently do you discuss their work with them? \_\_\_\_\_  
\_\_\_\_\_

(d) What are their occupations and employers? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**JUROR NUMBER** \_\_\_\_\_

10. Please indicate the highest level of formal education that you completed:

- \_\_\_\_\_ Some high school
- \_\_\_\_\_ High school graduate
- \_\_\_\_\_ Some college
- \_\_\_\_\_ College graduate
- \_\_\_\_\_ Post-Graduate work

If you have any post-graduate degrees, please list the degrees that you have obtained (*e.g.*, Master's, Ph.D, J.D., M.D.): \_\_\_\_\_

11. If you attended college or did post-graduate work, what were your major areas of study? \_\_\_\_\_

12. Do you hold any professional licenses? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please describe: \_\_\_\_\_

13. People sometimes start out studying for one field, and for whatever reason change their mind and end up in another. Were there once any separate areas of concentration outside your eventual major or eventual degree? If so, what were they? \_\_\_\_\_

14. Have you ever served in the military? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

- (a) What branch of the service? \_\_\_\_\_
- (b) What was your highest rank? \_\_\_\_\_
- (c) What type of discharge? \_\_\_\_\_

15. Have you ever been a part of or played a role in the accounting or bookkeeping functions at your place of employment? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

(a) Have you ever been involved in the preparation of either quarterly or year-end financial statements put out by the company (10-K or 10-Q)? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_

(b) Have you ever been involved in an internal or external audit? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_

16. Do you own or rent your current residence? Own \_\_\_\_\_ Rent \_\_\_\_\_. If you own your current residence:

- Is the property a house or an apartment? \_\_\_\_\_

**JUROR NUMBER** \_\_\_\_\_

- Is there currently a mortgage on the property? Yes \_\_\_\_\_ No \_\_\_\_\_
  - What company / bank issued the mortgage? \_\_\_\_\_  
\_\_\_\_\_
  - What company / bank now holds the mortgage? \_\_\_\_\_  
\_\_\_\_\_
  - Have you ever had any problems with a bank, financial institution or mortgage company about that mortgage? \_\_\_\_\_  
\_\_\_\_\_
  - How many total mortgages would you say you have had in your lifetime? \_\_\_\_\_  
\_\_\_\_\_
17. Have you ever owned real estate, even if you do not currently own (*e.g.*, you once owned a home but now you rent, you own(ed) rental property)? Yes \_\_\_\_\_ No \_\_\_\_\_
18. Have you, or any member of your immediate family, ever owned or operated your own business? Yes \_\_\_\_\_ No \_\_\_\_\_
- (a) If yes, what kind of business? \_\_\_\_\_
- (b) Is that business still in existence? Yes \_\_\_\_\_ No \_\_\_\_\_
- (c) If not, why did the business go out of business? \_\_\_\_\_  
\_\_\_\_\_
- (d) If it failed, what in your opinion is the reason why it failed? \_\_\_\_\_  
\_\_\_\_\_
19. Have you ever had a dispute or problem of any kind with any bank, financial institution or mortgage company, including a foreclosure proceeding or a property repossession? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_
20. Have you ever had a loan of any kind from Household Finance Co., Beneficial Finance Co., any Household company, or HSBC? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:
- What kind of loan was it? \_\_\_\_\_
  - When did you get that loan? \_\_\_\_\_
  - Have you paid the loan off? Yes \_\_\_\_\_ No \_\_\_\_\_
21. Are you taking any medication which may affect your ability to concentrate? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_

**JUROR NUMBER** \_\_\_\_\_

22. Do you have any medical condition that would make it difficult for you to serve as a juror?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_
23. Do you have any problem with your hearing or vision that would prevent you from assessing all of the evidence at this trial?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_
24. Do you have any difficulty in understanding, speaking or reading English?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_
25. The following is a list of the parties associated with this lawsuit. Do you know any of the parties?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please circle the name(s) below and explain your connection to or knowledge of that party.

HSBC or any of its subsidiaries

Household International, Inc.

William F. Aldinger

Gary D. Gilmer

David A. Schoenholz

PACE Industry Union Management Pension Fund

The International Union of Operating Engineers Local No. 132 Pension Plan

Glickenhau & Company

26. The following is a list of the potential witnesses who may testify at this trial. Do you know any of the following potential witnesses? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please circle the name(s) below and explain your connection to or knowledge of that person.

Ancona, Edgar

Ghiglieri, Catherine

Bajaj, Mukesh

Glickenhau, James

Cornell, Bradford

Hicks, Stephen

Cross, Charles

Hueman, Dennis

Detelich, Thomas

James, Christopher

Devor, Harris

Markell, Helen E.

Ferrell, Allen

May, Todd

Fischel, Daniel R.

O'Han, Robert

**JUROR NUMBER**\_\_\_\_\_

Rybak, Walter

Streem, Craig A.

Schneider, Thomas

Walter, Lewellyn

27. The following is a list of the law firms for the parties, and the individual attorneys who may participate in the trial. Do you know any of the individual attorneys or any attorneys or other employees who work for any of these firms? Yes \_\_\_\_ No \_\_\_\_\_. If yes, please circle the name(s) below and explain your connection to or knowledge of that attorney or law firm.

Robbins Geller Rudman & Dowd LLP

Michael J. Dowd  
Spencer A. Burkholz  
Daniel S. Drosman  
Luke O. Brooks  
Maureen E. Mueller  
Hillary Stakem

Miller Law, LLC

Marvin M. Miller  
Lori A. Fanning

Jackson Walker LLP

Tim S. Leonard

Katten Muchin Rosenman LLP

Gil M. Soffer  
Dawn M. Canty

McDermott Will & Emery LLP

David S. Rosenbloom  
C. Maeve Kendall

Skadden Arps Slate Meagher & Flom LLP

Patrick J. Fitzgerald  
R. Ryan Stoll  
Donna L. McDevitt  
Andrew J. Fuchs

Williams & Connolly LLP

Dane H. Butswinkas  
Steven M. Farina  
Amanda M. MacDonald  
Leslie C. Mahaffey

**JUROR NUMBER** \_\_\_\_\_

28. The following is a list of other people and organizations that may be the subject of testimony at the trial. Do you know any of the following? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please circle the name(s) below and explain your connection to or knowledge of that person or organization.

Wells Fargo Bank

Household Finance Company

Beneficial Finance Company

29. Do you know the judge in this case, the Honorable Jorge Alonso? Yes \_\_\_\_\_ No \_\_\_\_\_

30. Do you have any friends or relatives who are lawyers or work in the legal profession? Yes \_\_\_\_\_ No \_\_\_\_\_

(a) Name of law firm? \_\_\_\_\_

(b) Type of law practiced? \_\_\_\_\_

(c) How close a relationship? \_\_\_\_\_

(d) Will you promise not to seek that person's advice about the case if you are a juror here? Yes \_\_\_\_\_ No \_\_\_\_\_

31. Have you, or any member of your immediate family, or close friends, ever been employed or received any education or training in the following areas? This includes taking any classes, working part-time, etc.

- Banking Yes \_\_\_\_\_ No \_\_\_\_\_
- Mortgage broker Yes \_\_\_\_\_ No \_\_\_\_\_
- Consumer finance or other lending institutions Yes \_\_\_\_\_ No \_\_\_\_\_
- Accounting Yes \_\_\_\_\_ No \_\_\_\_\_
- Stocks and/or securities trading Yes \_\_\_\_\_ No \_\_\_\_\_
- Investing Yes \_\_\_\_\_ No \_\_\_\_\_
- Economics/finance/bookkeeping Yes \_\_\_\_\_ No \_\_\_\_\_
- Compliance with government regulations Yes \_\_\_\_\_ No \_\_\_\_\_
- Statistical Analysis Yes \_\_\_\_\_ No \_\_\_\_\_
- Insurance Yes \_\_\_\_\_ No \_\_\_\_\_



**JUROR NUMBER** \_\_\_\_\_

If yes to any of the above, who and in what field? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

32. Have you ever served on a jury before? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

- Was it a civil or criminal case? \_\_\_\_\_
- What was the case about? \_\_\_\_\_  
\_\_\_\_\_
- Did the jury deliberate? Yes \_\_\_\_\_ No \_\_\_\_\_
- Did the jury reach a unanimous verdict? Yes \_\_\_\_\_ No \_\_\_\_\_
- Were you the foreperson? Yes \_\_\_\_\_ No \_\_\_\_\_
- Were you satisfied with the verdict? Yes \_\_\_\_\_ No \_\_\_\_\_

33. What did you think of your past jury service or experiences? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

34. In your past jury experiences, did you have any trouble understanding the judge's instructions to the jury on the law? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

35. Is there anything about your past jury experiences which makes you believe you would be unable to serve fairly on this case? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

36. Do you understand the difference between a criminal and civil case? Yes \_\_\_\_\_ No \_\_\_\_\_  
What is your understanding of the difference? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

37. Do you understand the job of a juror is to decide the facts in a case and apply the law as the judge instructs you? Yes \_\_\_\_\_ No \_\_\_\_\_

38. Even if you think the law is wrong, will you apply the law as the judge explains it? Yes \_\_\_\_\_ No \_\_\_\_\_

39. Have you or another member of your immediate family ever sued somebody else? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

**JUROR NUMBER** \_\_\_\_\_

- (a) How many times and what about? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (b) Did that case go to trial? Yes \_\_\_\_\_ No \_\_\_\_\_
- (c) If not, how was the case resolved? \_\_\_\_\_  
\_\_\_\_\_
- (d) Were you satisfied with the outcome? Yes \_\_\_\_\_ No \_\_\_\_\_
- (e) Do you think that the outcome of the suit or suits would affect your ability to listen to the facts in this case with an open mind and make fair judgments about the conduct of these plaintiffs and defendants? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, how so?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

40. Have you or another member of your immediate family ever been sued by somebody?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:

- (a) How many times and what about? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- (b) Did that case go to trial? Yes \_\_\_\_\_ No \_\_\_\_\_
- (c) If not, how was the case resolved? \_\_\_\_\_  
\_\_\_\_\_
- (d) Were you satisfied with the outcome? Yes \_\_\_\_\_ No \_\_\_\_\_
- (e) Do you think that the outcome of the suit or suits would affect your ability to listen to the facts in this case with an open mind and make fair judgments about the conduct of these plaintiffs and defendants? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, how so?  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

41. Have you ever testified under oath in any legal proceeding?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please provide the following about the most recent three cases:

JUROR NUMBER \_\_\_\_\_

	Case #1	Case #2	Case #3
Court	___ Federal ___ State ___ Unsure	___ Federal ___ State ___ Unsure	___ Federal ___ State ___ Unsure
Type of Legal Proceeding	___ Criminal ___ Civil ___ Unsure	___ Criminal ___ Civil ___ Unsure	___ Criminal ___ Civil ___ Unsure
Were you called by the plaintiff or defendant?	___ Plaintiff ___ Defendant	___ Plaintiff ___ Defendant	___ Plaintiff ___ Defendant
What was the nature of the case ( <i>e.g.</i> , drugs, murder, accident, discrimination)?			

42. This case is a class action. Will the fact that this case is a class action influence your judgments in this case?

Yes \_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_

43. Have you ever been part of a class action lawsuit? Yes \_\_\_\_ No \_\_\_\_.

44. Have you ever taken a payday loan (a short term loan to get cash, that you repaid with your next paycheck)? Yes \_\_\_\_ No \_\_\_\_.

45. How closely do you follow the stock market?

\_\_\_\_ Very closely  
\_\_\_\_ Somewhat closely  
\_\_\_\_ Follow a little  
\_\_\_\_ Not at all

46. Did you ever own stock in Household International, Inc.? Yes \_\_\_\_ No \_\_\_\_.

47. Have you ever received quarterly or annual reports concerning an investment you made? Yes \_\_\_\_ No \_\_\_\_\_. If yes:

(a) Did you read them? Yes \_\_\_\_ No \_\_\_\_

(b) If not, why? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**JUROR NUMBER** \_\_\_\_\_

48. If you read these reports, was there anything about them that you did not understand?  
Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, what, if anything, did you do about that? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
49. Have you had investments that you were dissatisfied with? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes:
- (a) What type of investment (stock, bond, etc.)? \_\_\_\_\_  
\_\_\_\_\_
- (b) What industry or sector? \_\_\_\_\_  
\_\_\_\_\_
- (c) Did you lose money? Yes \_\_\_\_\_ No \_\_\_\_\_
- (d) Did you think it was anyone's fault that you lost money?  
Yes \_\_\_\_\_ No \_\_\_\_\_
- (e) Who did you think was at fault? \_\_\_\_\_  
\_\_\_\_\_
- (f) Why? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
50. Is there anything about your investment experiences that would prevent you from serving as a fair and impartial juror in this case? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain.  
\_\_\_\_\_  
\_\_\_\_\_
51. Do you have any feelings about how much risk there is to someone who invests in the stock market? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, what are your feelings? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
52. Have you or anyone close to you ever been the victim of fraud? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
53. Have you or anyone close to you ever been taken advantage of in a financial or business dealing? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain: \_\_\_\_\_  
\_\_\_\_\_
54. How closely do you follow business and financial news?  
Very closely \_\_\_\_\_ Somewhat closely \_\_\_\_\_ Not at all \_\_\_\_\_

JUROR NUMBER \_\_\_\_\_

55. How often do you read the following newspapers, magazines or websites/blogs, or watch the following television networks:

Newspaper/Magazine/ Website/Television Network	Daily	Weekly	Occasionally	Never
Barron's				
Bloomberg				
Businessweek				
Chicago Sun Times				
Chicago Tribune				
CNBC				
Crain's Chicago Business				
Daily News				
Financial Times				
Forbes				
Fox Business				
Fox News				
Money Magazine				
The New York Times				
The Wall Street Journal				

56. Do you read financial blogs regularly?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, do you comment or post on these blogs? Yes \_\_\_\_\_ No \_\_\_\_\_

57. Are you a member of, or active in, any organizations or clubs?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, please list all such clubs or organizations and any leadership roles you have had in those clubs or organizations: \_\_\_\_\_

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58. The plaintiffs and defendants will each call expert witnesses who are being paid in excess of \$500 per hour. Do you believe that if an expert witness is paid that much money you will not listen to or consider their testimony fairly? Yes \_\_\_\_\_ No \_\_\_\_\_

59. Have you or anyone close to you ever been harmed by corporate dishonesty? Yes \_\_\_\_\_ No \_\_\_\_\_

**JUROR NUMBER** \_\_\_\_\_

60. If the unlawful conduct of a company caused you financial harm, would you file a lawsuit to recover all of your damages? Yes \_\_\_\_\_ No \_\_\_\_\_
61. Do you belong to any group or organization that favors tort reform – that is, limiting the amount of money that a jury can award to a plaintiff in a civil lawsuit? Yes \_\_\_\_\_ No \_\_\_\_\_
62. Do you believe that there are too many lawsuits being brought against large companies? Yes \_\_\_\_\_ No \_\_\_\_\_
63. Will you hold it against the plaintiffs if none of them testify in this case? Yes \_\_\_\_\_ No \_\_\_\_\_
64. If you are selected to serve on this jury, will you resist the temptation to use a computer to Google or do research on the internet about any witness, event, legal issue, or lawyer in this case until after you have returned your verdict? Yes \_\_\_\_\_ No \_\_\_\_\_
65. This trial will last approximately three weeks. Will that cause any special hardship for you, either because of trips you have planned, medical procedures you have scheduled, or anything else that might interfere with your ability to be here over the next three weeks? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
66. Is there anything, any reason at all, however personal or private, that makes you feel that you would not like to serve on this case, or that it would not be fair to one party or the other to have a juror such as yourself on this jury? Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**JOINT SUBMISSION OF PROPOSED VOIR DIRE  
QUESTIONS AND CORRESPONDING OBJECTIONS**

**[Exhibit B-5 to [Proposed] Final Pretrial Order]**



The parties agree that much of the information normally sought in oral voir dire questions can more effectively and efficiently be elicited in the form of a written questionnaire to prospective jurors so as to both ease the burden on the Court and protect the privacy of potential jurors. Thus, the parties have agreed upon a set of questions to be included in a written jury questionnaire, and the parties propose that the written jury questionnaire attached to the [Proposed] Final Pretrial Order at Tab B-4 be administered to prospective jurors.

The following are questions that the parties did not agree to include in the proposed written jury questionnaire. Thus, Plaintiffs and Defendants, as indicated, propose that the Court ask the following questions in oral voir dire. The party proposing the question is indicated in the second column. The proposed question is indicated in the third column. The opposing party's objection to the question, if any, is indicated in the fourth column.

<b>No.</b>	<b>Proposing Party</b>	<b>Question</b>	<b>Objection (if any)</b>
1.	Plaintiffs	Do you believe there are cases in which a jury award of a large amount of damages to compensate someone for financial harm caused by wrongdoing is warranted?	Defendants object to this question because it is hypothetical, conditioning, and will not elicit pertinent information.
2.	Plaintiffs	On the other hand, do you believe there are cases in which a jury award of a large amount of damages to compensate someone for financial harm caused by wrongdoing is improper?	Defendants object to this question because it is hypothetical, conditioning, and will not elicit pertinent information.
3.	Plaintiffs	Do you believe that if someone suffers financial harm as a result of someone else's wrongdoing that the person who is harmed should have the right to go to court to seek compensation to make up for his or her losses?	Defendants object to this question because it is hypothetical, conditioning, and will not elicit pertinent information.
4.	Plaintiffs	Would you hold a corporation to the same level of fairness and honesty as an individual?	Defendants object to this question because it is hypothetical, conditioning, and will not elicit pertinent information.
5.	Defendants	Have you ever seriously considered suing somebody else, but ended up not doing it? If yes, explain.	Plaintiffs object to this question because it will not elicit pertinent information.

No.	Proposing Party	Question	Objection (if any)
6.	Defendants	Have you ever fallen behind on payments in any loan and worked with the lender to get your payments back to current?	Plaintiffs object to this question because it will not assist the parties in selecting a jury and may be offensive to jurors that have to answer in the affirmative. In addition, the question incorrectly suggests that banks “work with” their customers to get payments back to current. Defendants’ question thus misstates the facts.
7.	Defendants	How, if at all, has your personal financial situation changed in the last 8 years? Gotten better; Stayed the same; Gotten worse	Plaintiffs object to this question because it will not assist the parties in choosing a jury. The question asks whether a juror’s financial condition has changed since the financial crisis, but this case has nothing to do with the financial crisis, which occurred at least five years after the end of the class period.
8.	Defendants	What is your overall opinion of the ethics and honesty of: (a) Large corporations (b) Large banks (c) Corporate executives (d) Wealthy people	Plaintiffs object to these questions because they are insufficiently specific to elicit pertinent information. Further, these questions assume that jurors hold blanket opinions about certain categories of people ( <i>e.g.</i> , corporate executives, wealthy people, etc.). As a result, these questions are objectionable because they appeal to the jurors’ prejudices.

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' EXHIBIT LIST**

**[Exhibit C-1 to [Proposed] Final Pretrial Order]**

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
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)	Admitted at prior trial, 401, 402, not 403, 803(6), 801(d)(2)
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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403
D0568	Keefe, Bruyette & Woods, Inc. (Vincent Daniel and Raj Kommineni), Initiating Coverage of Household International With a Market Perform Rating, Yet Another Un-Investable Situation, August 27, 2002				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403
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	401, 402, not 403
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	401, 402, not 403
D0851	Household International Inc., Annual Report for the Fiscal Year Ended December 31, 2000 (Form 10-K) (March 28, 2001)				No objection	
D0852	Household International Inc., Annual Report for the Fiscal Year Ended December 31, 2001 (Form 10-K) (March 13, 2002)				No objection	
D0874	Household International Inc., Quarterly Report for the Quarterly Period Ended June 30, 2002 (Form 10-Q) (August 14, 2002)				No objection	
P0006	Household International, Inc. Form 10-Q for the Quarterly Period Ended June 30, 2001	8/10/2001			No objection	
P0009	Arizona Consent Decree	11/5/2003			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; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407)	Admitted at prior trial, 401, 402, not 403
P0019	Household Bank FSB, Prospect Heights IL - FDIC Issues and Findings, FDIC Review Concurrent with OTS Exam	8/27/2001			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 (802)	Admitted at prior trial, 401, 402, not 403, 803(8), 703, 801(c)

Plaintiffs' Trial Exhibit List 4-22-16

Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P0023	The New York Times Press Release - Lawsuits and Regulators Shadow Big Lender's Future	8/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c) (not offered for the truth of the matter asserted), 703
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	7/25/2000			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)	Admitted at prior trial, 401, 402, 803(8), 703, 801(c)
P0041	Bulletin re: Prohibited Sales Practices	5/24/2001	Rob O'Han	All HFC Sales Offices & HFCPS Management	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	Admitted at prior trial, 401, 402, not 403
P0067	E-mail Subject: Re: Reage Testing and Tracking	9/4/2001	Thomas J Harmon	James F Connaughton	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	401, 402, not 403
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	401, 402, not 403
P0069	Haden Hakes e-mail forwarding Forbes Article	8/16/2002	Sandy L. Derickson	Chuck A. Colip, Jody C. Berns, Patrick R. Boney, Jeanne E. Gruner, James F. Connaughton, Brian W. Zempel, Wilbert P. Noronha, Susan B. Jewell, Joseph W. Hoff, Richard C. Klesse, Leigh F. Hogan	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial; 803(6) and, as to <i>Forbes</i> article, 801(c)

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P0070	E-mail Subject: re: Reage Policies	7/16/2002	Joseph W Hoff	Dave K Stockdale	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	401, 402, not 403
P0074	Memo Subject: Re: August Results	8/9/2002	Daniel J Pantelis	Dave K Stockdale	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	401, 402, not 403
P0075	E-mail Subject: Re-age Recidivism Re-stated	6/11/2002	Daniel J Pantelis	Steve L McDonald	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 803(6), 801(d)(2)
P0076	E-mail Subject: Re: S&P Presentation	3/7/2002	Kenneth K Gang	Daniel J Pantelis	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	401, 402, not 403
P0077	E-mail Subject: Re: Re-age Single vs. Multiple; Attachment Single vs. Multiple.xls	9/16/2002	Daniel J Pantelis	Kenneth K Gang	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 803(6), 801(d)(2)
P0079	E-mail re: DAS request - OTS recidivists	6/11/2002	Kenneth Gang	Daniel J Pantelis	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	Admitted at prior trial, 401, 402, not 403
P0086	E-mail chain Subject: Re: Reage Volume in June - Urgent	6/5/2002	Douglas A. Friedrich	Gregory A Gibson	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	401, 402, not 403
P0095	E-mail string re: Earnings Release Certification	1/13/2003	David J Fatina	Douglas A Friedrich; Chris K Worwa	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	401, 402, not 403
P0097	E-mail Subject: Reage Meeting Summary	10/4/2002	Paul A Makowski	Paul on Lotus Note	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	401, 402, not 403



Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P0102	E-mail string re Minutes for April 7, 2000 Credit Committee	4/11/2000	Jim O'Brien	Credit Committee Members	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	Admitted at prior trial, 401, 402, not 403
P0114	E-mail Subject: Re: Reage Targets & Policy Meeting 8/1	8/6/2002	Daniel J Pantelis	James F Connaughton	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	401, 402, not 403
P0118	E-mail string Subject: Spike report for 4/9/2002	4/10/2002	Rich X Peters	Dave K Stockdale	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	Admitted at prior trial, 401, 402, not 403
P0129	E-mail string re: Chapter 13 Restructures	10/10/2002	Connie Rogers	Cong Phan	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	Admitted at prior trial, 401, 402, not 403
P0135	Financial Relations Conference	4/9/2002			No objection	
P0140	Legg Mason Spring Cleaning But Risks Remain	4/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial; 801(c)
P0151	Household Mortgage Services, Restructure Review, April 26, 2002	4/26/2002			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	Admitted at prior trial, 401, 402, not 403
P0157	E-mail Subject: All of the Collection Changes	12/16/1999	Gary D Gilmer	Joe A Vozar	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	Admitted at prior trial, 401, 402, not 403
P0176	Household Quality of Accounting Policies Applied in Financial Reporting with handwritten notes, 11/13/2000	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	Admitted at prior trial, 401, 402, not 403

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P0177	Household International, Inc. Form 10-K for the Fiscal Year Ended December 31, 2002	3/25/2003			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	401, 402, not 403
P0180	Memorandum Re: discussion document reviewed by Dave Stockdale and Paul Makowski	5/28/2002	Paul Makowski	Doug Friedrich, Rich Peters, Greg Gibson	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	Admitted at prior trial, 401, 402, not 403
P0181	E-mail re: Delinquency	8/15/2001	Paul Makowski	William Aldinger, et al.	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	Admitted at prior trial, 401, 402, not 403
P0182	CFRA Report - ""Continued Concerns in Q2 (6/02) Following Restatement""	8/19/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703; 801(c)
P0183	Household International Conference Transcript Moderator: Edgar Ancona 04/09/02, 8:15am CT	4/9/2002			No objection	
P0185	E-mail re: Restructure Performance	9/17/2001	Daniel Pantelis	Dave Schoenholz	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. Gilmer: 402 and 802	401, 402, not 403; 801(c), 803(6), 801(d)(2)
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	Admitted at prior trial, 401, 402, not 403
P0190	E-mail string re: trying to help	12/3/2001	David B Sochol	Celeste Murphy, Craig Stroom	Hearsay (FRE 802)	803(6), Sochol email also admissible as not offered for the truth of the matter asserted

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P0198	Investor Relations Report, May - August 2002				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 803(6), 801(c)
P0199	Investor Relations Report, September - October 2002				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 803(6), 801(c)
P0201	Investor Relations Report, January - February 2002				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)
P0202	Investor Relations Report, March - April 2002				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)
P0227	Press Release - Household International Certifies Accuracy of SEC Filings in 2002; ;Reaffirms Business Outlook for Balance of the Year; Restates Certain Prior Period Accounts	8/14/2002			No objection	
P0231	Household International, Inc. Form 10-K/A for the Fiscal Year Ended December 31, 2001	8/27/2002			No objection	
P0232	Household International, Inc. Form 10-Q for the Quarterly Period Ended March 31, 2002	5/10/2002			No objection	

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P0234	Letter Re: Process Served in California for Beneficial California, Inc.	11/14/2001		Paula McGuire	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)	Admitted at prior trial, 401, 402, not 403, 801(c)
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	7/17/2002	[HHS02139957-88: James B Kauffman]	[HHS02139957-88: Paul A Silver; David W Huey]	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)	401, 402, not 403, not 407 or 408 - contains admissions by defendants
P0239	Letter re: Washington DFI's Subpoena Duces Tecum No. 2002-140-S01	2/22/2002	Charles Cross	Tom Schneider	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)	Admitted at prior trial, 401, 402, not 403, 803(8), 801(c)
P0241	Executive Complaints - January Review	2/11/2002	Robin Allcock	Gary Gilmer; Mike Eden; Rob O'Han; Tom Detelich; Ned Hennigan	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	Admitted at prior trial, 401, 402, not 403
P0245	Memorandum re: November & December 2000 AG, BBB & Regulatory Complaints	1/6/2001	Carla Madura	Robin Allcock, Tom Schneider	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	Admitted at prior trial, 401, 402, not 403
P0258	E-mail Subject: Whiskey Reage Calculations	6/19/2002	Paul A Makowski	William F. Aldinger	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	Admitted at prior trial, 401, 402, not 403
P0262	E-mail re: 2+ Reconciliation	2/6/2001	Victoria Worrell	Douglas Friedrich	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	Admitted at prior trial, 401, 402, not 403
P0264	E-mail re: Use of Sales Forms	4/2/2002	Rob O'Han - HFC Sales	All HFC Sales Employees	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	Admitted at prior trial, 401, 402, not 403

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P0265	HFC First Mortgage Sales Materials	1/4/1999			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	Admitted at prior trial, 401, 402, not 403
P0266	Memo re: Prohibited Sales Practices	5/24/2001	Rob O'Han	All HFC Sales Offices & HFCPS Management	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	Admitted at prior trial, 401, 402, not 403
P0267	E-mail with the subject Tomorrow	1/4/1999	Tricia Myers	CDCStaff & GMTs	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	Admitted at prior trial, 401, 402, not 403
P0269	The HFC Sales Staff Plan (eff. 1/1/2000)	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	Admitted at prior trial, 401, 402, not 403
P0276	Housing Discrimination Complaint for Jose Nanez	2/20/2002			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)	Admitted at prior trial, 401, 402, not 403, 803(6), 803(8), 703, 801(c)
P0283	Bellingham Herald article Headline: Lender admits to violations; FINANCE: Household International says some policies may have been violated by Bellingham office.	7/26/2002	John Stark		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 703, 801(c)
P0285	Letter re: Inquiry Re: Feo Ranges on the Good Faith Estimate	7/5/2002	Kenneth A Markison	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)	Admitted at prior trial, 401, 402, not 403, 803(8), 801(c)

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P0286	The New York Post Press Release - Household Blocks Report In Suit Over Financing Practices	5/30/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P0289	Deposition Transcript of Charles Cross taken in Luna v. Household Finance Corp., No. C02-1635 (W.D. Wash.)	12/19/2002			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 804(b)(1)) as to the individual defendants; LR 16.1, Pretrial Order Form as to testimony	401, 402, not 403, admissibility resolved by prior court ruling. See Dkt. No. 1516 at 9-10
P0290	Washington DFI Expanded Report of Examination for Household Finance Corporation III as of April 30, 2002	4/30/2002			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)	Admitted at prior trial, 401, 402, not 403, 803(8), 703, 801(c)
P0298	E-mail Subject: January 2001 Skip-A-Pay	12/1/2000	Robin Allcock	Thomas M Detelich	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 803(6), 801(d)(2)
P0303	E-mail re: Review	5/23/2001	Robert O'Han	Tom Schneider	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. Gilmer: 802	Admitted at prior trial, 401, 402, not 403; 801(c), 803(6), 801(d)(2)
P0305	Loan Features/Calculations (Overview) for HFC	12/5/2001			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	Admitted at prior trial, 401, 402, not 403
P0313	E-mail from Paul Makowski to William Aldinger, et al. Re: Delinquency	8/15/2001	Paul Makowski	William Aldinger, et al.	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 803(6)

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P0324	Letter from Minnesota Department of Commerce to Household Board of Directors re Industrial Loan and Thrift Examination - IL 920 Plymouth, MN	9/23/2002	Terry R Meyer	Tom Schneider	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)	Admitted at prior trial, 401, 402, not 403, 801(c), 803(6), 803(8), 703
P0329	Faxed copy of New Jersey Beneficial Exam	12/19/2001	Marc Giacovelli	Gary Gilmer	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)	Admitted at prior trial, 401, 402, not 403, 801(c), 803(6), 803(8), 703
P0333	Household Letter Re: Regulatory Examination Licenses MLB-111 7 ML-18 (Virginia)	6/18/2002	Stephen Hicks	Nancy Walker	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)	Admitted at prior trial, 401, 402, not 403, 803(8), 703, 801(c)
P0335	Commonwealth of Virginia State Corporation Commission Bureau of Financial Institutions Letter Re: License No. MLB-215	11/30/2001	Russell M Spain III	Tom Schneider	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)	Admitted at prior trial, 401, 402, not 403, 801(c), 803(6), 803(8), 703
P0347	Memorandum re: U.S Consumer Finance Growth Strategies (Meeting with Andrew Kahr 12/18)	10/23/1998	Paul Creatura	Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
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	1/27/1999	Gary Gilmer	Bill Aldinger, Larry Bangs, Colin Kelly, Bobby Mehta, Ken Robin, Dave Schoenholz, Ron Bruckert, Paul Creatura, Kay Curtin, Tom Detelich, Doug Friedrich, Kathy Madison, Steve Nesbitt, Walt Rybak, Dick Schaffer, Joe Vozar, George Wilson	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	Admitted at prior trial, 401, 402, not 403
P0349	Household Memorandum (Minutes of February 1999 Senior Management Meeting)	3/18/1999	Randy Raup	Bill Aldinger, Larry Bangs, Rocco Fabiano, Gary Gilmer, Ken Harvey, Colin Kelly, Bobby Mehta, Ken Robin, Dave Schoenholz	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	Admitted at prior trial, 401, 402, not 403
P0360	Household Memorandum Subject: MS March Results	4/15/2002	David A Schoenholz	Bill Aldinger	No objection	
P0373	Memorandum re: March Monthly Letter	4/10/2001	Lisa Sodeika	Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403
P0378	E-mail (Fla Review)	5/30/2002	Robert P. O'Han	Thomas M Detelich	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. Gilmer 402 and 802	401, 402, not 403; 801(c), 803(6)



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P0379	FAX (Florida Review/Effective Rate complaints/Prohibited Sales Practices); Fax Re: IMPORTANT (E-mails Re: Fla Review attached to fax)	5/20/2002	Rob O'Han	Tom Detelich	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)	Admitted at prior trial, 401, 402, not 403, 801(d)(2), 803(6), 703
P0382	E-mail re: Responsible Lending Summit - June 20, 2001	6/21/2001	Ned Hennigan	Thomas Detelich	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	401, 402, not 403
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	401, 402, not 403
P0386	Agenda for Meeting with Household Finance Corporation	5/23/2002			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	Admitted at prior trial, 401, 402, not 403
P0405	Investor Relations Report, September - October 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)
P0406	Investor Relations Report, May - August 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)
P0407	Investor Relations Report, March - April 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)

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P0411	Investor Relations Report, November - December 2000				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 803(6), 801(c)
P0428	Memorandum re: Field Visit Examination as of March 12, 2001 with handwritten notes	4/30/2001	Paul Creatura		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. Gilmer 802	401, 402, not 403; 803(6), 803(8), 801(c)
P0440	E-mail re: No Subject	6/14/2002	Timothy Titus	Dave Schoenholz, Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403
P0445	E-mail string re: Meeting with Michigan Regulators	6/18/2002	Stephen Hicks, Susan Mocerino	Robin L Allcock, et al.	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	Admitted at prior trial, 401, 402, not 403
P0447	E-mail stringre: Parity Act	1/13/1999	Robin Allcock	Gary D Gilmer, et al.	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	Admitted at prior trial, 401, 402, not 403
P0454	Handwritten Notes re 2+	3/1/2000			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	Admitted at prior trial, 401, 402, not 403
P0458	E-mail string re: Growth in 1999	12/22/1998	Gary Gilmer	Ron Bruckert, et al.	No objection	
P0461	Memorandumre: December and YTD Operating Results	1/18/1999	Gary Gilmer	Bill Aldinger	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	Admitted at prior trial, 401, 402, not 403
P0463	E-mail string re: MAC Follow-Up	10/13/1999	Gary Gilmer	Ron Bruckert, et al.	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	Admitted at prior trial, 401, 402, not 403

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P0469	UBS Warburg Analyst Report - Management Remains Confident in Outlook	12/5/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P0471	Memo Re: Articles from today's Chicago Tribune and Chicago Sun-Times Re: Yesterday's Conference Call	2/8/2002	Megan Hayden	William F Aldinger; David A Shoenholz; Gary Gilmer; KH; RF; CK BM; KR	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 703, 801(c), 803(6)
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	5/28/2002	Kay Curtin	Gary Gilmer, Ken Robin	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	Admitted at prior trial, 401, 402, not 403
P0481	HFC Beneficial Memo Subject: October Results	11/16/2000	Gary Gilmer	Bill Aldinger	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	Admitted at prior trial, 401, 402, not 403
P0482	Letter from re: July Results	8/14/2000	Gary Gilmer	Bill Aldinger	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	Admitted at prior trial, 401, 402, not 403
P0496	Letter/Attachments Re: Bill Ryan's Negative First Call Coverage of HI compared to Associates + other analysts First Call notes of Associates	1/31/2000			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	401, 402, not 403
P0499	Memo Re Presentation Material for Board Meeting	1/3/2001	David Schoenholz	Bill Aldinger	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	Admitted at prior trial, 401, 402, not 403

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P0501	Notes/Attachment Re: Bill Ryan's HI 2q00 Earnings review	7/26/2000	David A Schoenholz	Rocco	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 801(c)
P0503	Household Press Release - Household Reports Record Second Quarter Results; 12th Consecutive Record Quarter; ;o Earnings Per Share Increase 16%, to \$.93;o Net Income Rises 14%, to \$439 Million Receivables Up 15%, to \$91.5 Billions of Revenues Grow 19%	7/18/2001			No objection	
P0504	PR Newswire Press Release - Household Reports Record First Quarter Results; 11th Consecutive Record Quarter; -Earnings Per Share Increase 17%, to \$.91 -Net Income Rises 16%, to \$432 Million - Receivables Up 17% Over First; Quarter of '00 to \$88 Billion	4/18/2001			No objection	
P0508	E-mail string from William Aldinger to Gary Gilmer and Kenneth Robin Re: NJ Audit	1/31/2002	William F Aldinger	Gary D Gilmer	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	Admitted at prior trial, 401, 402, not 403
P0510	E-mail from re: Florida AG	5/2/2002	William F Aldinger	Kenneth H Robin,	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	Admitted at prior trial, 401, 402, not 403
P0512	Memorandum Re: Revised - New Reaging Policy	6/27/2002	Bill Aldinger	Dave Schoenholz	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	Admitted at prior trial, 401, 402, not 403
P0514	E-mail string Re: Whiskey Reage Calculations w/ handwritten notes	6/24/2002	William Aldinger	David A Schoenholz	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. Gilmer 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6)

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P0515	Memorandum re: CFRA report	7/11/2002	Bill Aldinger	Craig Stroom	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 803(6), and as to certain portions of exhibit, also 801(c)
P0516	E-mail string re Discussion Framework	7/1/2002	Gary Gilmer	Donna Taillon	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)	Admitted at prior trial, 401, 402, not 403, not 408
P0530	E-mail string re: Volumes	7/9/1999	Gard D Gilmer	David B Little, et al.	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	Admitted at prior trial, 401, 402, not 403
P0533	Memorandum re: Redoing HFC Mortgage Forms to Impose High Prepayment Penalties	3/20/1999	Andrew Kahr	Joe Vozar, et al.	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	Admitted at prior trial, 401, 402, not 403
P0540	E-mail Subject: Skip-A-Pay Update 1/15	1/16/2001	Joe A Vozar	Peter Sesterhenn, Dan Anderson, Carin M Rodemoyer, Richard J Kolb	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. Gilmer 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P0543	Report re: March	4/16/2001	Gary Gilmer	Bill Aldinger	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	Admitted at prior trial, 401, 402, not 403
P0545	Household Interoffice Memorandum with attached Memorandum Subject: July Results;	8/16/1999	Pete Sesterhenn	Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403

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P0550	Forwarded E-mail (Multistate Working Group Reply to HFC)	8/15/2002	Kathleen K Curtin [forwarded from David Huey]	Lisa M Sodeika; Megan E Hayden; James B Kauffman; Mark F Leopold; Kenneth H Robin; Thomas M Detelich; Robin Allcock; cmurphy@mwe.com; ddunne@hewm.com; gboudreaux@boudreauxleonard.com; nhartigan@mwe.com; gretchen@nwstrategies.net; clipsett@wilmer.com	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)	Admitted at prior trial, 401, 402, not 403, not 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)	401, 402, not 403, not 408, 803(8), 801(c)
P0554	E-mail Subject: Estimated Impacts	9/3/2002	Joe A Vozar	Thomas M Detelich	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)	401, 402, not 403, not 408
P0556	Sodeika notes re Settlement Request from AARP 11/01 and Settlement Outline from WA	6/14/2002	Lisa Sodeika	Joe Vozar	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)	401, 402, not 403, not 408

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P0557	HFC/Beneficial Quality Control Interoffice Memorandum subject: Review of benefits test on booked loans from August, November and December of 2001	1/24/2002	Ken Cashmer	Mike Dougherty	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	Admitted at prior trial, 401, 402, not 403
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	Admitted at prior trial, 401, 402, not 403
P0562	Faxed E-mail and Bulletin Board Re Charging Points and Origination Fees; Fax with attached E-mails and memos Re: Points on points	3/15/2002	Tom Schneider	Lisa Sodeika	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. Gilmer 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P0573	E-mail string re: Effective Rate	3/15/2002	Thomas M. Detelich	Lisa M. Sodieka	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. Gilmer 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P0578	Letter from the Office of the Attorney General of Washington re: Request for General Information for the July 9, 2002 Meeting	6/24/2002	David Huey	Kathleen Curtin	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)	401, 402, not 403, not 408, 803(8), 801(c)
P0584	Letter w/ attachment re: Examination of Elmhurst Office	3/4/2002	Ed Burgert	Terry Price	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)	Admitted at prior trial, 401, 402, not 403, 801(c), 803(8)
P0585	Fax of Household Letter 12/27/2001re: Report of Examination, Household Finance Corporation III - License #000211; Branches 001-009	1/2/2002	Robin Allcock	Sandra Rosenberg	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	Admitted at prior trial, 401, 402, not 403

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P0586	Business Wire Press Release - Department of Corporations Seeks \$8.5 Million Penalty for Predatory Practices: Household Beneficial Cited for Thousands of Lending Law Violations	11/14/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2), 803(6)
P0596	E-mail re: Very important to do today.	7/5/2001	Beth Hansgen	Stacey Baker, et al.	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	Admitted at prior trial, 401, 402, not 403
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)	Admitted at prior trial, 401, 402, not 403, not 408
P0618	E-mail Subject: Reage policies	7/12/2002	Rich X Peters	Douglas A Friedrich; Gregory A Gibson; Chris K Worwa; Elaine H Markell; Curt X Cunningham; Per X Ekholdt; David J Fatina; Loren J Morris; Dave W Urbanca; Scott S Mowry; Steve J Peart; Michael L Skonning	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	Admitted at prior trial, 401, 402, not 403



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P0634	E-mail Subject: Framework for the Discussion of Issues Concerning Lending Practices of Household International, Inc.	6/29/2002	Kathleen Curtin	Gary Gilmer; Larry Bangs; Megan Hayden; Lisa Sodeika; Robin Allcock; James Kauffman; Kenneth Robin; Thomas Detelich; Mark Leopold; Kathy Mikos; Paul Creatura; Walt Rybak; Joe Vozar	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)	401, 402, not 403, not 408
P0635	HSBC Press Release - Household Reports Record First Quarter Net Income; First Quarter Earnings Per Share Rises 20%, to \$1.09; First Quarter Net Income Increases to \$511 Million; Managed Receivables Up 14.5%, to \$101.2 Billion	4/17/2002			No objection	
P0649	E-mail re: Reage Policy	1/3/2002	Paul Makowski	Sandy Derickson	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	Admitted at prior trial, 401, 402, not 403
P0650	E-mail Subject: Reage Policy	12/17/2001	Paul A Makowski	Chuck Colip; James Connaughton; Sandy L Derickson	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	Admitted at prior trial, 401, 402, not 403
P0654	E-mail string re Retail Services Reage Policy	9/4/2001	Paul A Makowski	Sandy Derickson; Chuck Colip; James F Connaughton; Thomas J Harmon; David J Nauman	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	Admitted at prior trial, 401, 402, not 403

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P0660	Household Investor Relations Report September-October 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(d)(2), 803(6), 801(c)
P0671	E-mail Subject: Big Apple	12/10/1999	Robin Allcock	Vineet Saxena	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	Admitted at prior trial, 401, 402, not 403
P0681	AG Costs, Sides Loans	7/15/2002			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; Offer to Compromise/Settlement (FRE 408)	Admitted at prior trial, 401, 402, not 403, not 408
P0694	Household Review of Loss Reserves & Quality of Accounting Policies	11/12/2001			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	Admitted at prior trial, 401, 402, not 403
P0700	Deutsche Banc Alex. Brown Analyst Report - Solid 2Q Performance-Strong Buy	7/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P0706	HSBC Press Release - Household Reports Record Quarterly and Full-Year Net Income; Fourth Quarter Earnings Per Share Rises 14%, to \$1.17;Fourth Quarter Net Income Increases to \$549 Million; Receivables Up \$5.2 Billion in the Quarter, to \$100.8 Billion; Full Y	1/16/2002			No objection	
P0707	Household International, Inc. Form 10-Q for the Quarterly Period Ended September 30, 2001	11/14/2001			No objection	
P0708	Household International, Inc. Form 10-K for the Fiscal Year Ended December 31, 2000	3/28/2001			No objection	

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P0712	Comptroller of the Currency Administrator of National Banks: Report of Examination Household Bank (SB), N.A. Las Vegas, NV	10/19/1998			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)	Admitted at prior trial, 401, 402, not 403, 803(8), 801(c)
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	Admitted at prior trial, 401, 402, not 403
P0725	Household, Dave Schoenholz, Vice Chairman-Chief Financial Officer - Financial Relations Conference - April 9, 2002	4/9/2002			No objection	
P0726	E-mail string Re: Revise reage analysis	7/2/2002	John R Davis	David A Schoenholz	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	Admitted at prior trial, 401, 402, not 403
P0733	Household International, Inc. Form 10-Q for the Quarterly Period Ended March 31, 2001	5/9/2001			No objection	
P0765	HFC Branch Sales Manager, 2001 Incentive Compensation Overview	11/29/2000			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	401, 402, not 403
P0770	Memo Re: Special Restructures	5/22/2002	Elisa Gargul	Mike Skonning	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	Admitted at prior trial, 401, 402, not 403
P0772	Compensation Committee Meeting Materials for September 10, 2002	9/10/2002			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	Admitted at prior trial, 401, 402, not 403
P0773	Board of Directors Meeting Agenda July 26, 2002 8:30 a.m.	7/26/2002			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	401, 402, not 403
P0774	Compensation Committee Meeting Materials for January 28, 2002	1/28/2002			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	Admitted at prior trial, 401, 402, not 403

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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	Admitted at prior trial, 401, 402, not 403
P0788	HSBC Press Release - Household Reports Record Second Quarter Results on Strong Receivables Growth	7/17/2002			No objection	
P0789	July 17, 2002 Household Conference Call	7/17/2002			Contains Hearsay (FRE 802)	801(c), 801(d)(2), 803(6)
P0791	Household International Conference Call Transcript dated October 11, 2002	10/11/2002			Contains Hearsay (FRE 802)	801(c), 801(d)(2), 803(6)
P0794	Memorandum re: March & April 2001 AG, BBB, & Regulatory Complaints	5/25/2001	Carla Madura	Robin Allcock; Tom Schneider	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	Admitted at prior trial, 401, 402, not 403
P0796	E-mail string re: Unauthorized Materials	6/18/2001	Ned M. Hennigan	Gary D. Gilmer	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	Admitted at prior trial, 401, 402, not 403
P0798	E-mail string re: URGENT -- Responsible Lending Summit Presentations	6/14/2001	Ned M Hennigan	Thomas M Detelich, Teri M Molloy, Brenda J Clayton, Dana M. Williams, Ned M Hennigan	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	Admitted at prior trial, 401, 402, not 403
P0799	Forwarded E-mail (Equivalent Rate Sheet); E-mail from Ned Hennigan to Dana Williams re Equivalent Rate Sheet	6/5/2001	Ned M Hennigan	Dana M. Williams	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	Admitted at prior trial, 401, 402, not 403
P0809	Forwarded Investor Relations Report November-December 2001	2/5/2002	Paul Makowski	Dan Pantelis; Dave Stockdale; Gary Harman	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2), 803(6)

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P0820	Investor Relations Report, November-December 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 801(d)(2), 803(6)
P0823	Letter Re: Merger Agreement with HSBC	3/19/2003	William F Aldinger	Stockholders	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	401, 402, not 403
P0825	Price Waterhouse Coopers Presentation, Correspondent Lending Roundtable, Predatory Lending - Responding to the Risks	10/31/2000			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; Hearsay (FRE 802)	Admitted at prior trial, 401, 402, not 403, 803(6), 703
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	Admitted at prior trial, 401, 402, not 403
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	5/21/2001	Patrick Hardman; Tom Schneider	Chuck Cross; Craig Castelein	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)	Admitted at prior trial, 401, 402, not 403, 801(d)(2), 803(6), 803(8), not 901, 801(c)
P0835	Letter Re late fees; Parity Act; Communications	5/28/1999	Andrew Kahr	Joe Vozar	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	Admitted at prior trial, 401, 402, not 403

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P0841	E-mail Re CA Dept of Commerce Press Release	11/15/2001	Gary D Gilmer	Paul J Creatura; Kathleen K Curtin; David B Little; Steve R Nesbitt; Lisa M Sodeika; Joe A Vozar; Thomas M Detelich; Kathy A Mikos; Walt Rybak; Donna L Taillon; George O Wilson	No objection	
P0842	Memorandum re: California Complaint	11/13/2001	Gary Gilmer	Bill Aldinger; Denis O'Toole; Larry Bangs; Kay Curtin; Megan Hayden; Colin Kelly; Dave Schoenholz; Greg Snyder; Lisa Sodeika; Craig Stroom	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	Admitted at prior trial, 401, 402, not 403
P0846	Letter Re: formation of Household International's Consumer Advisory Board	3/14/2001	Mark Thompson	Gary Gilmer	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)	Admitted at prior trial, 401, 402, not 403, 803(6), 803(8), 801(c)
P0858	E-mail string re No Subject	12/31/1999	Joe A Vozar	Peter Sesterhenn	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	Admitted at prior trial, 401, 402, not 403
P0867	E-mail chain re Accounting presentation	6/14/2002	Janet L Burak	Steve L McDonald, Kay A Nelson, Cliff S Mizialko	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	401, 402, not 403

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P0890	Household Memorandum with attached re: January/February Investor Relations update	3/1/2002	Craig Streem	William Aldinger, David Schoenholz	Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2), 803(6)
P0891	Household Investor Relations Report March - April 2001				Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2), 803(6)
P0898	Memorandum re: Insurance Service Staff Meeting; r	5/12/2000	Ron Bruckert	All HFC Branch Sales Managers	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	Admitted at prior trial, 401, 402, not 403
P0899	Fax re: June/July 1999 Fax with attached Presentation (First Mortgage Sales HFC Northeastern Division)	5/21/2002	Paul Pichoske	Rob O'Han	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	Admitted at prior trial, 401, 402, not 403
P0900	E-mail Subject: Comparable/Equivalent Rate	5/25/2001	Ken A Walker	Robert P. O'Han	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	Admitted at prior trial, 401, 402, not 403
P0901	E-mail re: effective rate	5/24/2001	Paul E. Pichoske	O'Han, Robert P.	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. Gilmer: 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P0902	Forwarded E-mail (Unauthorized HOLP's); E-mail from Robert O'Han to Mike Pinto Re: Unauthorized HOLP's	5/22/2001	Robert P. O'Han	Pinto, Mike C.	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	Admitted at prior trial, 401, 402, not 403
P0903	Fax (Finding the 30 year equivalent of HFC's Bi-Weekly Program); re: 1st Mortgage	5/22/2001	Mike Pinto	Rob O'Han	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	Admitted at prior trial, 401, 402, not 403

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P0908	E-mail string re: Unauthorized Dated Material	6/21/2001	Dennis Hueman	Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403
P0916	Household Memorandum re: July Monthly Letter	8/3/1999	Robert P. O'Han	Tom Detelich	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	Admitted at prior trial, 401, 402, not 403
P0926	E-mail (Subject: Customer Complaints)	4/3/2002	JoAnn L. Barnes	Robert P. O'Han, Krista M Eads, Mandy S. Bartels	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6), 801(c)
P0956	Faxed Kansas' Report of Examination; Fax from Carla Madura to Robin Allcock Re: Examination of Kansas License	7/25/2002	Carla Modura	Robin Allcock	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)	Admitted at prior trial, 401, 402, not 403, 803(6), 803(8), 703, 801(c)
P0964	Letter re: Household Finance/Beneficial Settlement with State of California Department of Corporations	4/23/2002	Paul Swierczek	Tom Schneider	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)	Admitted at prior trial, 401, 402, not 403, not 407, not 408, 803(8), 703, 801(c)
P0965	E-mail string from Robin Allcock to Susan Mocerino Re: AMPTA	11/27/2001	Robin L Allcock	Susan R Mocerino	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	Admitted at prior trial, 401, 402, not 403
P0967	Letter re: Field Visit Examination as of March 12, 2001	4/26/2001	David Kalina	Board Members	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)	Admitted at prior trial, 401, 402, not 403, 803(8), 801(c)



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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P0978	PR Newswire Press Release - Household Reports Highest Quarterly Net Income in its 123-Year History; Thirteenth Consecutive Record Quarter;;- Earnings Per Share Increases 14%, to \$1.07 -Net Income Rises to \$504 Million -Receivables Up 15%, to \$95.7 Billion;	10/17/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 803(6), 801(d)(2), 801(c)
P0979	New York Times article Headline: Lender, Previously Unscathed, Faces Challenges	8/19/2002	Peter Eavis		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2)
P0984	Letter Re: Julian and Terry Johnston, HFC Loan No. 921300-00-871702 & 921300-12-114116, Your Complaint No. 2382	3/19/2002	Tom Schneider	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	Admitted at prior trial, 401, 402, not 403
P0985	Chicago Defender article Headline: Household International: It's no predatory lender	6/4/2002	Joe Ruklick		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P0986	Memorandum re: ACORN	1/8/2001	Larry N Bangs	Responsible Lending Committee; Janet Burak; Kay Curtin; Donna Funk; Kathleen Morrison; Denis O'Toole; Ken Robin; Pat Schwartz; Lisa Sodeika; Craig Streem; Megan Hayden (Edelman)	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	Admitted at prior trial, 401, 402, not 403

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
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)	Admitted at prior trial, 401, 402, not 403, 801(d)(2), 801(c)
P0995	E-mail re: Media Expectations	4/5/2002	Megan Hayden	Lisa Sodeika, et al.	No objection; Gilmer: 802	801(c), 803(6)
P1006	Household International, General Ledger- Purge Detail	1/10/2001			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	Admitted at prior trial, 401, 402, not 403
P1007	Household Memorandum re: Andrew Kahr	3/12/2001	David Schoenholz	Files	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	Admitted at prior trial, 401, 402, not 403
P1011	E-mail string re: ROI	1/18/2003	Curt Cunningham	David Marsh, et al.	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	401, 402, not 403
P1013	E-mail Subject: Re: Waite Park (54-5202), Minnesota Examination Response	6/24/2002	Stephen L Hicks	Ronald J Rossi	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6), 801(d)(2), 801(c)
P1017	E-mail Subject: Please Print this for Fran with attachment: Branch Visit and QAC Audit Review Summary July 9 - July 11, 2002	10/4/2002	Stephen L Hicks	Mary D. Brown	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	Admitted at prior trial, 401, 402, not 403
P1018	E-mail re: QAC Onsite Visit Objectives	7/8/2002	Stephen Hicks	Calo Bucaro	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6), 801(c)
P1020	E-mail chain Subject: Re: Chapter 13 Restructures	10/1/2002	Cong T Phan	Connie F Rogers	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. Gilmer: 402 and 802	401, 402, not 403; 803(6)

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P1026	E-mail re: Kahr Memos	6/28/2002	David Schoenholz	Kenneth Robin	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6)
P1038	E-mail with the subject Revised Tier 1&2 Spreadsheets attaching spreadsheet titled Highly Paid U.S. Employees - Tier 1- Parachute Calculations	4/26/2002	Susan Casey	Michael Carlson	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	Admitted at prior trial, 401, 402, not 403
P1048	E-mail Subject: Re: VRU EZPay attempted enrollment daily report	3/8/2002	Jeffery S. Bransford	David J. Fatina	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6)
P1090	Restructure Policy Summary By Business Unit from January 2000 to Present	2/28/2003			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	Admitted at prior trial, 401, 402, not 403
P1095	AE, Branch, District & Division 2000 Goals	2/17/2000			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	Admitted at prior trial, 401, 402, not 403
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	9/10/2002	Amy M. Adams	Ethan Fogle	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)	Admitted at prior trial, 401, 402, not 403, 801(c), 703
P1100	E-mail Subject: Legacy Restructures	4/4/2002	Walt Rybak	Gary D Gilmer	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	Admitted at prior trial, 401, 402, not 403
P1103	E-mail re: coll rewrites	7/29/2002	Walt Rybak	Thomas Detelich	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P1108	E-mail Subject: Fitch	4/16/2002	Edgar D Ancona	Dave Schoenholz	No objection	

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1109	E-mail re: AGs	9/25/2002	Edgar Ancona	Dave Schoenholz	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)	Admitted at prior trial, 401, 402, not 403, not 408
P1112	E-mail Subject: HOEPA/Section 32	8/19/2002	David B Little	M A Dougherty	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6)
P1117	E-mail Subject: Reage Meeting Summary 7/9/2002	7/11/2002	Dave Schoenholz	Dave Stockdale	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. Gilmer: 802	Admitted at prior trial, 401, 402, not 403; 801(d)(2), 803(6)
P1119	E-mail string re: Whiskey	7/16/2002	Paul Makowski	Gary Harman	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	Admitted at prior trial, 401, 402, not 403
P1131	E-mail string re: accelerating charge offs in third or fourth quarter	9/17/2001	Joe Vozar	Gary Gilmer	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	Admitted at prior trial, 401, 402, not 403
P1148	E-mail Subject: Follow-up To Yesterday's Meeting	8/28/2002	Thomas M Detelich	Robert P O'Han	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 803(6)
P1150	E-mail re: Reage Recidivism	7/25/2002	Paul Makowski	Daniel Pantelis	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. Gilmer: 402 and 802	401, 402, not 403; 803(6), 801(d)(2), 801(c)
P1156	E-mail re: Tom	8/30/2002	Donna Taillon	Craig Stroom	No objection	
P1204	OTS Report of Examination, August 27, 2001	8/27/2001			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)	Admitted at prior trial, 401, 402, not 403, 803(8), 703, 801(c)

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1205	OTS Special Compliance Examination	1/16/2003	Philip A Janiga	John E Ryan	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)	Admitted at prior trial, 401, 402, not 403, 803(8), 703, 801(c)
P1224	Presentation Re: KPMG Report on Accounting and Credit Policies Detailed Portfolio Matrices - Final	3/12/2002			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	Admitted at prior trial, 401, 402, not 403
P1236	Morgan Stanley - Equity Research Report - ""Worth a Look""	10/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1241	Morgan Stanley, ""Discounts the Risk: Upgrade""	7/31/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1247	E-mail Re: Household	1/23/2001	Kenneth Posner	Michael.Blumstein@msdw.com	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)	Admitted at prior trial, 401, 402, not 403, 801(c), not 901
P1248	Goldman Sachs Presentation	12/4/2001			No objection	
P1267	Household International, Inc. Form 10-K A No. 2 for the Fiscal Year Ended December 31, 2001	3/20/2003			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; Subsequent Remedial Measure (FRE 407)	Admitted at prior trial, 401, 402, not 403, not 407
P1275	Household International, Inc. Form DEF 14A for the Period Ended April 9, 2002	4/9/2002			No objection	

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1291	National Mortgage News article Headline: ACORN Says Household 'Tricked' Clients (TEL002336 - 37)	2/18/2002	Kyriaki Venetis		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c)
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	3/18/2003			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; Offer of Compromise/Settlement (FRE 408); Subsequent Remedial Measure (FRE 407)	401, 402, not 403, not 407, not 408, <i>see also</i> Plaintiffs' MIL No. 3
P1305	Department of Corporations Seeks \$8.5 Million Penalty for Predatory Practices; Household & Beneficial Cited for Thousands of Lending Law Violations	11/14/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c)
P1306	Transcript of HH Investor Conference Call	8/14/2002			Contains Hearsay (FRE 802)	801(c), 801(d)(2), 803(6), 703
P1307	B&C News article: Fed's Predatory Proposal Supported by Household	3/23/2001	Brad Finkelstein		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 801(d)(2)
P1308	William Blair & Company Household International, Inc. Report: Investor Day Highlights Growth Initiatives and Enhanced Disclosures (HHS01942899 - HHS01942901)	4/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c)
P1312	Raymond Chenvert and Alisa Chenvert, husband and wife, vs. Household Finance Corporation, Household Realty Corporation, Household Finance Corporation III	9/27/2000			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	Admitted at prior trial, 401, 402, not 403

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P1314	Summary of Refunds and Other Remedies Proposed by Attorneys General; 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)	401, 402, not 403, 803(8), not 408, 1006, 801(c)
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)	401, 402, not 403, 803(8), not 408, 1006, 803(6), 801(c)
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)	401, 402, not 403, 803(6), not 408, 1006
P1319	HOUSEHOLD 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)	401, 402, not 403, 803(6), not 408, 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)	401, 402, not 403, 803(6), not 408, 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)	401, 402, not 403, 803(6), not 408, 1006



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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to 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)	401, 402, not 403, 803(6), not 408, 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)	401, 402, not 403, 803(6), not 408, 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)	401, 402, not 403, 803(6), not 408, 1006
P1328	Letter (Settlement Discussion - Reply to HFC's 7/17/02 Response)	8/14/2002	David W Huey	Kathleen Curtin	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)	401, 402, not 403, 803(8), not 408, 801(c)
P1329	Attorney General of Washington letter RE: Multistate Working Group	6/24/2002	David W Huey	Kathleen K Curtin	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)	401, 402, not 403, 803(8), not 408, 801(c)
P1333	Letter re: Expanded Report of Examination	3/14/2001	Chuck Cross	Tom Schneider	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)	Admitted at prior trial, 703, 401, 402, not 403, 803(8), not 901, 801(c)



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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	Admitted at prior trial, 401, 402, not 403
P1338	Wells Fargo Bank Corporate Consumer Credit Administration	5/10/2002			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; Hearsay (FRE 802)	Admitted at prior trial, 401, 402, not 403, 801(d)(2), 803(6), 703
P1340	E-mail string Re: Observations of Debriefing Package from Corporate Consumer Credit Administration	5/6/2002	Dianne Krall	Hal Arneson; Dave Munio	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)	Admitted at prior trial, 401, 402, not 403, 803(6)
P1343	E-mail Subject: FW: Message from Les Biller - re: Blazer	5/15/2002	Jim R Donohue	Todd May, Steve McConley	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)	Admitted at prior trial, 401, 402, not 403, 803(6)
P1351	Consumer Finance, WFF Due Diligence, Blazer Executive Summary by the Business Team, May 9, 2002	5/9/2002			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)	Admitted at prior trial, 401, 402, not 403, 803(6), 801(d)(2), not 901
P1359	Confidential Household International, Inc. Board of Directors May XX, 2002	5/1/2002			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)	Admitted at prior trial, 401, 402, not 403, 803(6), 801(d)(2), not 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)	Admitted at prior trial, 401, 402, not 403, 803(6), 801(d)(2), not 901
P1369	E-mail Subject: Blazer Board Presentation with attached April Board Meeting - April 11	4/11/2002	Todd May	Dick M Kovacevich, Howard L Atkins	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)	Admitted at prior trial, 401, 402, not 403, 803(6)

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1371	E-mail chain Subject: FW: Project Blazer	4/22/2002	Paula Roe	Todd May	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)	Admitted at prior trial, 401, 402, not 403, 803(6)
P1374	Bloomberg Press Release - Household hires banking official for compliance role	5/23/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1375	Wall Street Journal Press Release - Household International Inc. May Be Near Large Settlement	10/4/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1376	Origination News Press Release - Activists Call for Household To Tie CEO Pay to Practices	6/1/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1377	Dow Jones Business News Press Release - Household International Lowers Restates Past Profits by \$386 Million	8/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
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	Admitted at prior trial, 401, 402, not 403

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1384	E-mail chain Subject: State of TN Branch 84-3001 Examination	6/27/2002	Robin L Allcock	James Kauffman, Kathleen K Curtin	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 801(d)(2), 803(6)
P1385	E-mail chain Subject: Fitch servicer review	10/15/2002	Elaine H Markell	Douglas Friedrich, Gregory A Gibson, C K Worwa, D James Fatina	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	Admitted at prior trial, 401, 402, not 403
P1386	E-mail string re Fitch Data	10/30/2002	Elaine H Markell	Gregory A Gibson	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	Admitted at prior trial, 401, 402, not 403
P1387	E-mail Subject: Re-age Fitch Servicer Presentation Slides	10/15/2002	Douglas A Friedrich	Elaine H Markell	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	Admitted at prior trial, 401, 402, not 403
P1388	SFGate.com Article, ""How Providian misled card holders""	5/2/2002			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)	401, 402, not 403, 703, admitted at prior trial, 801(c)
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	3/19/2003			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; Offer of Compromise/Settlement (FRE 408); Hearsay (FRE 802)	401, 402, not 403, not 408, 703, 801(d)(2)
P1390	Chart - Value of \$100 Invested in Household International, the S&P Financials Index, and the S&P 500 Index [11/14/01-10/11/02]				Hearsay (FRE 802)	703, 803(17)
P1391	Dow Jones News Service & Wall Street Journal - Event Study for Household International, Inc. [7/30/99 - 3/28/03]				Hearsay (FRE 802)	Admitted at prior trial, 703

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1392	Effect on Statistical Significance of Specific Disclosures After Including Dr. Bajaj's Consumer Finance Index in Fischel Report Regression Model [11/15/01-10/11/02]				Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document concerns an expert opinion Defendants will not offer in the retrial; Hearsay (FRE 802)	703, 401, 402, not 403
P1393	Materials Fischel Relied Upon in Forming Opinions Contained in his Rebuttal Report				Hearsay (FRE 802)	703
P1394	Estimation of Predicted Returns For Quantification Including Leakage [11/15/01-10/11/02]				Hearsay (FRE 802)	703
P1395	HI Common Stock Estimate of Alleged Artificial Inflation For Quantification Including Leakage [7/30/99-10/11/02]				Hearsay (FRE 802)	703, admitted at prior trial
P1396	HI Common Stock Estimates of Alleged Artificial Inflation For Quantification Using Specific Disclosures and For Quantification Including Leakage [7/30/99-10/11/02]				Hearsay (FRE 802)	703
P1397	HI Common Stock Estimate of Alleged Artificial Inflation For Quantification Using Specific Disclosures [7/30/99-10/11/02]				Hearsay (FRE 802)	Admitted at prior trial, 703
P1398	HI Common Stock Price and True Values For Quantification Using Specific Disclosures and For Quantification Including Leakage After Accounting for Dr. Bajaj's Consumer Finance Index [7/30/99-10/11/02]				Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document concerns an expert opinion Defendants will not offer in the retrial; Hearsay (FRE 802)	703, 401, 402, not 403
P1399	HI Common Stock Price and True Value For Quantification Using Specific Disclosures [7/30/99-10/11/02]				Hearsay (FRE 802)	703
P1400	HI Common Stock Price and True Value For Quantification Including Leakage [7/30/99-10/11/02]				Hearsay (FRE 802)	703
P1401	Prudential Securities, Inc. - HI: Fundamentals Are in Our View-Raising Estimates; yet, We Believe Political/Headline Issues Remain-Lowering Target Prudential Securities	4/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1402	American Banker Press Release - Reforms Seen Hurting Household's Profits; Household International Inc.'s lending troubles could reduce its earnings; Brief Article; Statistical Data Included	9/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), admitted at prior trial
P1403	Stephens Inc. Investment Bankers - Research Notes; Quarter Income Statement	7/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1404	Bernstein Research Call - HI - Impact of AG Settlement on Earnings, Funding, and Capital	10/3/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1405	Bloomberg Press Release - Household Sued by CA for Alleged Lending Violations	11/14/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1407	Salomon Smith Barney - HI: California Lawsuit Likely More Bark Than Bite	11/15/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1408	Deutsche Banc Alex. Brown Inc. - California Dept of Corporations Files Complaint of Lending Abuses	11/15/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1409	Dow Jones Capital Markets Report: BARRON'S: Does It Add Up? A Look At Household's Accounting	12/1/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1410	Legg Mason Wood Walker, Inc. - Downgrading Rating to Market Performance; Part 3	12/11/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1411	Chicago Tribune Press Release - Household fighting image of predator; Suits, politicians put pressure on stock price	6/2/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1412	Deutsche Bank Securities Inc. - Scrutiny Outpacing Reform- Lowering Growth Rate and Target Price	8/12/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703

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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1413	Morgan Stanley - Equity Research Report - ""Price Target to \$53 on Earnings Restatement""	8/15/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1414	Credit Suisse First Boston Report - ""Finance Companies Market Flash - Household Finance Latest Clarifications and Perspectives""	9/9/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1415	Dow Jones News Service Press Release - Household Intl: Business Changes To Cost 10c/Share In '03	10/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1416	Chicago Tribune Press Release - Household may settle charges; In plan, firm pays \$475 million for predatory lending	10/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1417	Standard & Poor's Ratings Direct - Household International, Inc. Ratings Lowered; Outlook Remains Stable	10/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1418	American Banker Press Release - Banks Regain Ground; Household Shares Climb; Household International Inc.; Brief Article	10/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1419	Reuters News Press Release - Household International stock falls after report	12/3/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1420	Legg Mason Wood Walker, Inc - Are the Risks Real? Rating Suspended -part 1	12/3/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1421	Bernstein Research Call - HI: Loss Recognition Policies and the Other Unsecured Portfolio	12/4/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1422	American Banker Press Release - Fines, Tight Scrutiny in Household Settlement; to be scrutinized by California Department of Corporations	1/8/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)



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Trial Ex.	Description	Date	From	To	Defendants' Objections	Plaintiffs' Response to Objections
P1424	American Banker Press Release - In Brief: Household Vote: Activists Gain; Household International stockholders vote on compensation plan; Brief Article	5/15/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1426	CIBC World Markets - Equity Research Report - ""Household International Restates EPS On Accounting Revisions Related To Old Credit Card Contracts""	8/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1427	Boston Globe Press Release - Household Accused of Overcharging on Home Loans Advocate Files Suit Over Points, Fees	8/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1428	American Banker Press Release - Wash. State Report Slams Household's '99-'01 Tactics; Household International Inc.; reportedly failed to disclose important financial information; Brief Article	8/26/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1429	Bellingham Herald Press Release - State report details HFC lending abuse; FINANCE: Copy of suppressed report is leaked to several news organizations	8/27/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703

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P1430	American Banker Press Release - Battered Household Is Hit Again; securities analysts downgrade Household International Inc.; Brief Article; Statistical Data Included	8/28/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P1431	Bernstein Research Call - U.S. Consumer Finance Report - ""HI: Cutting Long-Run Growth Estimates on Impact of Sales Practice Reform in Branch-Based Real Estate Lending""	9/3/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703
P1432	UBS Warburg - Global Equity Research Report: ""Household: Lowering Target; Still Creating Value Despite Lower Growth""	10/8/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1433	American Banker Press Release - Aldinger Defends Household's Accounting; Brief Article	12/5/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1435	CIBC World Markets - Equity Research Report - HI: Lowering Price Target On Persistent Headline Risk, But Maintaining SP Rating	9/22/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)

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P1436	Deutsche Banc Alex. Brown Inc. - Unsubstantiated Claims Continue to Haunt Stock	2/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1437	Institutional Shareholder Services. - Heidi Brown, Analyst - Proxy Analysis Report	5/6/2002			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)	Admitted at prior trial, 703, 801(c)
P1438	Newsday Inc. Press Release: NY May Dump Lender's Stock; Predatory Accusations about Household concern McCall	5/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1439	Origination News article Headline: ACORN vs. HI, Take Three, Filed in Mass.	8/23/2002	Brian Collins		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c)
P1440	Chicago Tribune article Headline: Borrowers: Household misled us; Lender denies suit's allegations	5/3/2002	Melissa Allison		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c), 801(d)(2)

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P1441	The Seattle Post-Intelligencer article Headline: Complaints are Mounting over HFC's Lending; Borrowers Claim Company Boosts Interest Rates, Fees for Home Mortgages	4/18/2002	Jane Hadley		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P1442	Copley News Service article Headline: Class-action lawsuit accuses Household Finance of predatory lending	2/6/2002	James P. Sweeney		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 801(d)(2)
P1443	The Record article Headline: Lending Suit May Help N.J.; Accuses Household of Mortgage Fraud	5/10/2002	Richard Newman		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 801(c)
P1445	The Bellingham Herald article Headline: Complaints grow against Household Finance Corp.	4/21/2002	John Stark		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(d)(2), 801(c)
P1446	American Banker article Headline: For Household, New Fight and Small Victory, Household International Inc. blocks regulatory-exam report	5/31/2002	Erick Bergquist		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 703

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P1447	The Oregonian article Headline: High-Cost Home Loans Rise	7/2/2002	Gordon Oliver		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 801(d)(2)
P1448	National Mortgage News article Headline: State Regulator Slams Household Practices	9/2/2002	Brian Collins		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 801(c), 801(d)(2)
P1449	Minneapolis Star Tribune article Headline: Subprime lender adopts new rules; Household says it added protections	2/28/2002	Neal Gendler		Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 801(d)(2)
P1450	Deutsche Bank Securities Report: Household: Management Visit- Addressing The Challenges	9/12/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c)
P1452	PR Newswire Press Release - Household Responds to California Dept. of Corporations	11/15/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	Admitted at prior trial, 703, 801(c), 801(d)(2)

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P1453	PR Newswire Press Release - Household Expands Best Practice Lending Initiatives, Creates Unprecedented Protections for Borrowers Company's Voluntary Responsible Lending Initiatives Are Unparalleled in the Industry, Offering Clearer Disclosures; More Choi	2/27/2002			No objection	703, 801(c), 801(d)(2)
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	Admitted at prior trial, 401, 402, not 403
P1468	Reuters News Press Release - UPDATE 2-Before the Bell-Household, Nicor, Interpublic fall.	8/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P1469	Household Memorandum re: March Month End Results	4/5/2002	Cong Phan	Per Ekholdt, Elaine Markell	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	Admitted at prior trial, 401, 402, not 403
P1470	email string re Media Issue in Washington State	4/4/2002	Allcock	Hayden-Hakes	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	Admitted at prior trial, 401, 402, not 403
P1471	Vossen Complaint	7/24/2002	Detelich	Teri Molly	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. Gilmer: 402 and 802	Admitted at prior trial, 401, 402, not 403; 801(c), 801(d)(2), 803(6)
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)	401, 402, 801(c), not 403,

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<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P1476	Aldinger deposition transcript from SEC Proceeding, In the Matter of Household International, File No. C-03571-A	12/18/2003			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	401, 402, not 403, 801(d)(2), 16.1 objection inapplicable, document was used at prior trial to impeach defendant Aldinger
P1486	IR report/Stock price and rumors, time line of events				Hearsay (FRE 802); Lack of Foundation (FRE 901)	Admitted at prior trial, 801(d)(2), not 901, 803(6)
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)	Admitted at prior trial, 401, 402, not 403, 801(d)(2), not 901
P2000	Resume for Daniel Fischel				Hearsay (FRE 802)	703
P2001	Additional Examples of Dr. Bajaj's Flawed Criticisms				Irrelevant (FRE 402); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the document concerns an expert opinion Defendants will not offer in the retrial; Hearsay (FRE 802)	401, 402, not 403, 703
P2002	Event Study for Household International, Inc.	11/15/2001			Hearsay (FRE 802)	703
P2003	Chart of Bates Number Ranges of materials relied upon by Daniel Fischel				Hearsay (FRE 802)	703
P2004	Business Wire article - Fitch Affirms Household Int'l, Lowers HFC, Outlook To Neg	1/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2005	Credit Suisse First Boston analyst report: Household International (Buy)?Headlines Hang Over Name	1/15/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703

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P2006	Barron's article - Doubting Tyco	1/28/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2007	ABN-AMRO analyst report: HI Not trading on Fundamentals	2/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2008	Banking Wire article - Household Gets Rapped	2/21/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2009	Bernstein Research analyst report, Household International: Legal Risk to Business Model Increasing	5/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2010	Associated Press article - Household International 2Q net rose 17 percent on loan demand	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703



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P2011	CIBC World Markets analyst report: HI In-Line 2Q02 EPS Offer No Surprises; Maintain Buy	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2012	Capital One Shares Plunge After Regulators Step In, Bloomberg	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703, 801(d)(2)
P2013	Fox, Pitt, Kelton analyst report, US Specialty Finance, Regulatory Uncertainty Causes Big Problems For Consumer Finance Group	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2014	Legg Mason analyst report: HI Solid 2Q02; Remain Concerned	7/19/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2015	Portales Partners analyst report: HI: What's wrong with this picture	8/5/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703

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P2016	Bernstein Research analyst report, Household International: Taking ownership of confusing sales practices	8/5/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2017	Reuters article - Household Int'l says buys back \$1.22 bln bonds	8/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2018	Convertible Bonds May Haunt Their Issuers, Business Week Says, Bloomberg	2/21/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2019	Reuters News article - Research Alert - Merrill cuts Household Int'l target	9/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2020	National Mortgage News Editorial: Worst Practices	9/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	801(c), 703
P2021	Household International, Inc. Common Stock Estimates of Alleged Artificial Inflation	3/23/2001			Hearsay (FRE 802)	703, 803(17)

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P2022	Household International, Inc. Common Stock Price and True Value For Quantification Using Specific Disclosures & Quantification Including Leakage, March 23, 2001 - October 11, 2002	3/23/2001			Hearsay (FRE 802)	703, 803(17)
P2023	Chicago Tribune article - HSBC adds Household to holdings London bank to pay \$15 billion	11/15/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2024	Chart of Value of \$100 Invested in Household International, the S&P Financials Index, the S&P 500 Index, and Indexes of "Peer" Firms Identified in the Ferrell and James Reports, November 14, 2001 - October 11, 2002	11/14/2001			Hearsay (FRE 802)	703, 801(17)
P2025	Chart of Household International Common Stock Price and True Values For Quantification Including Leakage and Recalculated Leakage Model Including Indexes of "Peer" Firms Identified in the Ferrell and James Reports, March 28, 2001 - October 11, 2002	3/28/2001			Hearsay (FRE 802)	703, 801(17)
P2026	Moody's Investors Service global credit research rating action, Moody's Affirms The Ratings Of Household International, Inc. And Its Rated Subsidiaries, Including Household Finance Corporation Company Reaches Broad Agreement With States On Lending Practices	10/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2027	ABN-AMRO daily credit notes, Household has a good day and a downgrade	10/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2028	Credit Suisse First Boston Non-Bank Financial and Broker/Dealer Spread Watch, Plenty Of Fodder For The Shorts	10/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2029	PR Newswire article - Household Reports Operating Net Income of \$1.17 Per Share for the Third Quarter	10/16/2002			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	401, 402, not 403, 703, 801(d)(2), 801(c), 803(6)
P2030	Reuters article - Household profit up 11 pct on interest rate cuts,	1/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2031	Reuters article -Household's posts higher profits on low rates	4/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2032	Reuters article - Household Int'l earnings up with mortgage volume	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2033	Investor's Business Daily article - Household International Inc. Prospect Heights, Illinois Foresight Pays Off In Shift To Secured Loans	11/2/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2), 803(6)

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P2034	Prudential Financial analyst report, HI: Fundamentals Fine, Yet Political/Headline Issues Remain	4/12/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2035	Reuters article - Household plans to sell \$1.3 bln home equity notes	6/11/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2037	Standard & Poor's analyst report, Tyco International Ltd. Ratings Lowered; On Watch Developing On Market Access Concerns	2/4/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2038	Associated Press article - Tyco shares plunge again on accounting worries	2/4/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2039	Bear Stearns analyst report, HI: More Bad Publicity...How Much Worse Can it get?	2/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2040	Chicago Sun-Times article - Household says it can get capital for loans	2/8/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2041	Dow Jones Newswires article - Household CFO: No Problem In Raising Commercial Paper	2/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2042	National Post article - Steve Maich, 'Attack mentality' has markets on the run: Another bad week	2/9/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2043	Dow Jones Newswires article - CFA Financials Wrap: Brokers Down After Estimates Cut	2/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2044	A.G. Edwards analyst report, HI: Upgrading To Strong Buy From Buy	2/6/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2045	Dow Jones Newswires article - Fed Survey: Bks Saw Tighter Loan Standards, Less Demand	2/4/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2047	Business Wire article - Fitch Ratings Teleconference: Finance Companies	2/19/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2049	Bear Stearns analyst report, HI: Earnings Stronger Than Expected on Better RAL, Securitization Gains, and FASB	4/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2050	Salomon Smith Barney analyst report, HI: 1Q02 Results Top Estimates; Blocking and Tackling	4/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2051	Ventana Capital analyst report, HI: "Looking For Quality Earnings? You Won't Find It Here!"	4/25/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2057	Credit Suisse First Boston analyst report, Another Record Quarter at Household; Regulatory Risks Appear Low 16th Consecutive Quarterly Earnings Record Should Overpower Regulatory Risk--BUY	7/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2058	Fox, Pitt, Kelton analyst report, US Specialty Finance, HI Makes Numbers but Focus Has Changed	7/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2065	The Wall Street Journal article - Cox Communications Falls 19%, Comcast 14% as Market Slides,	8/6/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2066	Household Treasury Operation Presentation slides by Edgar Ancona	4/9/2002			No objection	
P2067	Lehman Brothers analyst report, Funding plans assume put of \$1B convert	6/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2068	Salomon Smith Barney Specialty and Mortgage Finance Weekly	8/12/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)



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P2074	Delinquencies rising, but auto ABS structures sound, Asset Securitization Report	9/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2075	Dow Jones Business News article - AmeriCredit Drops Use of Controversial Accounting Method after SEC Review	9/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2076	UBS Warburg analyst report, Household International: Reducing Price Target To \$41	9/18/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2078	Reuters article - U.S. financial stocks fall in weak economy	10/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2079	Dow Jones Newswires article - Tara Siegel Bernard, Credit Cards 3Q Results Mixed; Focus On New Regulations	10/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2080	Household International Cut to ?Sector Underperform? at CIBC, Bloomberg	10/8/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2082	CIBC World Markets Equity Research analyst Report: Downgrading To SU On Downside Risk Related To Fundamentals And Valuation	10/7/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2089	Fitch Affirms Household at ?A? following announcement	8/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2091	KBW analyst report, Initiating Coverage of Household International With a Market Perform Rating Yet Another Un-Investable Situation	8/27/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2093	Examples of Leakage Period Dates Without Significant Residual Returns on Which Both Firm-Specific, Nonfraud Related Information and Fraud Related Information Were Disclosed				Hearsay (FRE 802)	703, 801(c)
P2094	Ventana Capital analyst report, Used Car pile up.	11/30/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

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P2095	US Bancorp Piper Jaffray analyst report, Margin Expansion Drives Quarter, While Credit Quality Only Slightly Deteriorates, But Something To Watch Closely; Headwinds Remain	1/16/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2097	First Union Securities, Inc., Wachovia Securities analyst report, HI: Initiating research coverage with a buy rating	5/30/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2098	Credit Suisse First Boston report entitled Specialty Finance Monthly	3/2/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2099	Graph of Value of \$100 Invested in Household International and the Peer Group Identified in Household's Investor Relations Reports November 14, 2001 - October 11, 2002				Hearsay (FRE 802)	703, 801(d)(2)
P2100	Chart entitled Effect on Statistical Significance of Specific Disclosures After Including Prof. Ferrell's Index of CSFB Specialty Finance Universe "Peers" in Fischel Report Regression Model				Hearsay (FRE 802)	703
P2101	A. Craig MacKinlay, "Event Studies in Economics and Finance," 35 Journal of Economic Literature (Mar. 1997)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c)
P2102	G.William Schwert, "Using Financial Data to Measure Effects of Regulation," 24 The Journal of Law and Economics (1981)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)

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P2103	Daniel Fischel, "Use of Modern Finance Theory in Securities Fraud Cases Involving Actively Traded Securities," 38 The Business Lawyer (1982)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2104	Bradford Cornell and R.Gregory Morgan, "Using Finance Theory to Measure Damages in Fraud on the Market Cases," 37 U.C.L.A. L. Rev. 883 (1990)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2105	Glenn Pettengill & John Clark, Estimating Expected Returns in an Event Study Framework: Evidence from the Dartboard Column," 40 Quarterly Journal of Business & Economics (2001)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2106	E. Hutson and C. Kearney, "Merger arbitrage and the interaction between target and bidder stocks during takeover bids," 19 Research in International Business and Finance (2005)	1/29/2005			Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2107	Mark Mitchell and Jeffrey Netter, "The Role of Financial Economics in Securities Fraud Cases: Applications at the Securities and Exchange Commission," 49 Business Lawyer 545 (1994)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2108	N.I. Crew, et al. "Federal Securities Acts and Areas of Expert Analysis," in R.L. Weil, P.B. Frank, C.W. Hughes and M.J. Wagner (eds), Litigation Services Handbook (Wiley, 2007)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2109	D.I. Tabak and F.C. Dunbar, "Materiality and Magnitude: Event Studies in the Courtroom," in R.L. Weil, M.J. Wagner, and P.B. Frank (eds), Litigation Services Handbook (Wiley, 2001)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2112	Madge Thorsen, et al. "Rediscovering the Economics of Loss Causation," 6 J. Bus. & Sec. Law 93 (2006)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2113	S. Ragothaman and B. Bublitz, "An Empirical Analysis of the Impact of Asset Writedown Disclosures on Stockholder Wealth," 35 Quarterly J. of Bus. and Economics (June 1996)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P2116	Paul Malatesta & Rex Thompson, "Partially Anticipated Events: A Model of Stock Price Reactions with an Application to Corporate Acquisitions," 14 J. Fin. Econ. 237 (1985)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2117	Gregg Jarrell & Annette Poulsen, "Stock Trading Before the Announcement of Tender Offers: Insider Trading or Market Anticipation," 5 J. Law Econ. & Org. 255 (1989)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2118	Sanjat Bhagat & Roberta Romano, "Event Studies and the Law: Part II: Empirical Studies of Corporate Law," 4 Am. Law & Econ. Rev. (Fall 2002)				Hearsay (FRE 802) to the extent this document is offered as an exhibit; no objection to it being read into evidence (FRE 803(18))	703, 801(c), 803(18)
P2119	Bernstein Research, HI: Downgrade to Market Perform: Legal Threats Increase Structural Risk to the Business Model and Near-Term Earnings Risk"	3/5/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2120	HI Common Stock Estimates of Alleged Artificial Inflation For Quantification Using Specific Disclosures and For Quantification Including Leakage [3/23/01-10/11/02] (revised Ex. B to Fischel Rebuttal Report)				Hearsay (FRE 802)	703, 801(17)
P2123	Fox-Pitt Kelton Report, U.S. Specialty Finance	5/31/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2124	Household International, Inc. Common Stock Estimates of Alleged Artificial Inflation for Specific Disclosure Model [3/23/01-10/11/02]				Hearsay (FRE 802)	703, 801(17)
P2125	Household International, Inc. Common Stock Estimates of Alleged Artificial Inflation for Leakage Model [3/23/01-10/11/02]				Hearsay (FRE 802)	703, 801(17)

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P2126	Household International, Inc. Common Stock Price and True Value For Quantification Using Specific Disclosures, March 23, 2001 - October 11, 2002				Hearsay (FRE 802)	703, 801(17)
P2127	Household International, Inc. Common Stock Price and True Value For Quantification Including Leakage, March 23, 2001 - October 11, 2002				Hearsay (FRE 802)	703, 801(17)
P2128	List of False or Misleading Statements or Omissions				Hearsay (FRE 802); Incomplete Document (FRE 106); Improper Summary Exhibit (FRE 1006)	Not 106, 1006
P2129	"Household Finance Files \$3B Debt Securities Shelf," Dow Jones News Service	12/18/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2130	Lehman Brothers report, 1 Strong Buy	12/18/2001			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2131	"Household Intl Appoints KPMG LLP as Independent Auditor," Dow Jones News Service	3/13/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2132	Ventana Capital report, Notes From Household's International (HI-\$58-SELL) 10K	3/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P2133	"Household International Clarifies Purpose of \$10 Billion Shelf Registration," PR Newswire	4/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2), 803(6)
P2134	"Household Defends Practices, Predicts Good 2002," American Banker	4/10/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2135	Goldman Sachs report, Investment Thesis still Intact	4/17/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2136	"Household Finance to sell \$2.5 bln-\$3 bln bonds," Reuters News	5/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2137	"In Brief: Resolution for Household," American Banker,	5/14/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)

Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P2138	"Household plans \$1 bln car loan asset-backed debt," Reuters News	5/20/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2139	"Shareholder Vote Puts Pressure on Household to Curb 'Predatory' Practices," National Mortgage News	5/20/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2140	"S&P Asgns Household Auto Tr2002-1 Ser 2002-1 Nt Rtgs," Business Wire	5/31/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2141	"Moody's Rates Household Auto Series 2002-1 Notes Prime-1 And Aaa, Moody's Investor Service Press Release	5/31/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2142	"Household Intl Names Executives To New Positions," Dow Jones News Service	7/29/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2), 803(6)



Plaintiffs' Trial Exhibit List 4-22-16

<b>Trial Ex.</b>	<b>Description</b>	<b>Date</b>	<b>From</b>	<b>To</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Response to Objections</b>
P2143	UBS report	7/29/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2144	"Household said planning \$1.2 billion auto bond," Reuters News	8/19/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c)
P2145	"Household probed by Washington prosecutors," Reuters News,	8/20/2002			Hearsay (FRE 802) to the extent this document is introduced for the truth; no objection to the extent this document is introduced for the limited purpose of showing that the contents were publicly available or affected the price of Household stock	703, 801(c), 801(d)(2)
P2146	Household International first quarter 2002 Conference Call Transcript	4/17/2002			Contains Hearsay (FRE 802)	703, 801(c), 801(d)(2), 803(6)
P2147	Household International fourth quarter 2001 Conference Call Transcript	1/16/2002			Contains Hearsay (FRE 802)	703, 801(c), 801(d)(2), 803(6)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Defendants' Exhibit List\*

April 22, 2016

Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001				Composite Analyst Reports	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-A				Analyst Reports up until September 30, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-A.1			1/17/2001	Bernstein Research, <i>HI / Strong Earnings Offset Higher Losses</i> , January 17, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-A.2			3/2/2001	Credit Suisse First Boston, <i>Specialty Finance: Poised for a Strong Rebound; Robust Fundamentals</i> , March 2, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-A.3			5/25/2001	Deutsche Bank Alex. Brown, <i>Credit Card Quarterly, Subprime Lending: Serving the Underserved</i> , May 25, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-A.4			9/0/2001	Deutsche Banc Alex. Brown, <i>Credit Card Quarterly, Monolines Vs. Banks: Who Has the Competitive Edge?</i> , September 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401 403, 703, 801(c), 902(6), publicly available document
DX0001-B				Analyst Reports between October 1, 2001 and December 31, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-B.1			10/17/2001	Piper Jaffray, <i>Solid September Quarter At \$1.07; Margin Expansion Drives Quarter, While Credit Basically Stable, But Something To Continue To Watch Closely; Headwinds Continue To Grow</i> , October 17, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.2			10/18/2001	Legg Mason, <i>HI: Continued Solid Performance</i> , October 18, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.3			11/15/2001	Raymond James (Vinciguerra), <i>Providian Financial Corporation</i> , November 15, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document

\*Defendants' position is that a significant number of the exhibits designated by Plaintiffs are not relevant to the issues presented in the re-trial. Certain defense exhibits (DX0114 – DX0217) are designated in response to exhibits designated by Plaintiffs that Defendants believe are relevant, if at all, only to issues outside the scope of the re-trial. Defendants do not intend to use these exhibits if the scope of the trial is properly limited to the issues of causation and damages.

Defendants' Exhibit List

April 22, 2016

Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-B.4			11/27/2001	Wachovia Securities (Whitney, Herr & Sipkin), <i>Credit Cards 101: Complete Industry Primer</i> , November 27, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-B.5			11/28/2001	A.G. Edwards (Houck, Ward & Shanahan), <i>Credit Card Industry Review Third-Quarter 2001</i> , November 28, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.6			11/28/2001	Morgan Stanley (Posner, Nambiar & Meehan), <i>Weekly Pulse: Confidence, Employment Outlook Weaken</i> , November 28, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-B.7			11/30/2001	Ventana (Ryan), <i>Household International: Used Car Pile-Up</i> , November 30, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.8			12/2/2001	Deutsche Banc (Alpert, St. Leger & Swanberg), <i>Household International, Inc. (HI): "Strong Buy" Ridiculous Bashing by Barron's</i> , December 2, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.9			12/3/2001	ABN AMRO (Napoli, Kaster & Harte), <i>Household International, Inc.: Complete Analysis shows math is solid, reiterate Buy</i> , December 3, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.10			12/4/2001	Bernstein Research (Mason & Biggs), <i>HI: Loss Recognition Policies and the Other Unsecured Portfolio</i> , December 4, 2001	FRE 801, 802, 805	FRE 801(c)
DX0001-B.11			12/11/2001	Legg Mason (Sochol & Brendler), <i>HI: Downgrading Rating to Market Performance (part 1)</i> , December 11, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.12			12/11/2001	Legg Mason (Sochol & Brendler), <i>HI: Downgrading Rating to Market Performance (part 2)</i> , December 11, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-B.13			12/11/2001	Legg Mason (Sochol & Brendler), <i>HI: Downgrading Rating to Market Performance (part 3)</i> , December 11, 2001	FRE 801, 802, 805	FRE 801(c)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-B.14			12/12/2001	Morgan Stanley (Posner, Nambiar & Meehan), <i>Weekly Pulse</i> , December 12, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-C				Analyst Reports between January 1, 2002 and March 31, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-C.1			1/2/2002	Credit Suisse First Boston (Orenbuch, Hecht & Harter), <i>Specialty Finance, Fourth Quarter Earnings Preview</i> , January 2, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document
DX0001-C.2			1/2/2002	A.G. Edwards (Houck, Ward & Shanahan), <i>Specialty Finance Quarterly: Fourth Quarter 2001</i> , January 2, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.3			1/15/2002	Credit Suisse First Boston (Hesser & Ziegler), <i>Household International (Buy) — Headlines Hang Over Name</i> , January 15, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-C.4			1/15/2002	Ventana (Ryan), <i>Our Take On The Fitch Downgrade, And More! (HI-\$53-SELL)</i> , January 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.5			1/16/2002	Salomon Smith Barney, <i>HI: 4Q01 Results In Line and Solid</i> , January 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.6			1/16/2002	AG Edwards (Houck & Ward), <i>Upgrade HI Shares to Buy on Continued Performance and Attractive Valuation</i> , January 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.7			1/16/2002	Piper Jaffray (Grondahl & Elving), <i>Household International, Inc. Margin Expansion Drives Quarter, While Credit Quality Only Slightly Deteriorates, But Something to Watch Closely Headwinds Remain</i> , January 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.8			1/17/2002	Fox-Pitt Kelston (Tierney & McDonald), <i>HI Gets Bum Rap for Decent 4Q01</i> , January 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-C.9			1/17/2002	Ventana (Ryan), <i>High Quality Earnings? Wait Just a Second...Household (HI-\$54-SELL)</i> , January 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.10			1/25/2002	Bernstein Research (Mason & Biggs), <i>HI: Over-Discounting Negative Short-Term News Flow</i> , January 25, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.11			1/25/2002	Morgan Stanley (Posner & Meehan), <i>Auto Finance Channel Check: Signs of Sanity</i> , January 25, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.12			1/30/2002	Morgan Stanley (Posner, Nambiar & Meehan), <i>Weekly Pulse</i> , January 30, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.13			2/1/2002	Bernstein Research (Mason & Biggs), <i>Household International: Effect of Increasing Losses Overstated</i> , February 1, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.14			2/4/2002	Wachovia (Whitney, Herr & Sipkin), <i>Financial Regulators End Party for Subprime Issuers</i> , February 4, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.15			2/6/2002	A.G. Edwards, <i>Upgrading to Strong Buy from Buy</i> , February 6, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.16			2/6/2002	Ventana (Ryan), <i>"Stretching" For Growth Household (HI-\$45-SELL)</i> , February 6, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.17			2/7/2002	Bear Stearns, <i>More Bad Publicity...How Much Worse Can It Get?</i> , February 7, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-C.18			2/7/2002	Deutsche Bank, <i>Unsubstantiated Claims Continue to Haunt Stock</i> , February 7, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-C.19			2/8/2002	Ventana Capital, <i>Funding Manageable, Earnings Quality Still and Issue</i> , February 8, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-C.20			2/13/2002	Bernstein Research (Mason & Biggs), <i>HI: Collateral Damage</i> , February 13, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.21			3/5/2002	Bernstein (Mason), <i>HI: Downgrade to Market-Perform: Legal Threats Increase Structural Risk to the Business Model and Near-Term Earnings Risk (1 of 2)</i> , March 5, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.22			3/5/2002	Bernstein (Mason), <i>HI: Downgrade to Market-Perform: Legal Threats Increase Structural Risk to the Business Model and Near-Term Earnings Risk (2 of 2)</i> , March 5, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.23			3/15/2002	Salomon Smith Barney (Vetto & Parechanian), <i>Household International, Inc. - HI: 10k Offers Improved Disclosure</i> , March 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.24			3/18/2002	Salomon Smith Barney (Vetto), <i>Specialty Finance - SSB's Specialty Finance Weekly</i> , March 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-C.25			3/28/2002	Deutsche Banc Alex Brown, <i>Consumer Finance 2002 Outlook</i> , March 28, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D				Analyst Reports between April 1, 2002 and June 30, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-D.1			4/9/2002	Salomon Smith Barney (Vetto), <i>HI: Investor Day Opens the Kimono</i> , April 9, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.2			4/15/2002	Bernstein Research, <i>HI: Expect Strengthening of the Balance Sheet and Further Migration to Less Aggressive Accounting</i> , April 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-D.3			4/17/2002	William Blair, <i>Household International: Strong First Quarter, up 20%; Raising Estimates</i> , April 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.4			4/17/2002	Credit Suisse First Boston, <i>Tops Estimates On Way to 15th Consecutive Quarterly Record; Balance Sheet Significantly Strengthened</i> , April 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.5			4/18/2002	Bear Stearns, <i>Earnings Stronger Than Expected on Better RAL, Securitization Gains, and FASB 142 Change</i> , April 18, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-D.6			4/25/2002	Ventana Capital, <i>Looking For Quality Earnings? You Won't Find It Here!</i> , April 25, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-D.7			4/26/2002	Lehman Brothers (Harting & Cohen), <i>Specialty Finance Quarterly: Solid Results Continue</i> , April 26, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.8			5/3/2002	Credit Suisse First Boston, <i>New Initiatives will Outweigh Lending Practice Concerns</i> , May 3, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.9			5/3/2002	Bernstein Research, <i>HI / Legal Risk To Business Model Is Increasing; Market Perform</i> , May 3, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.10			5/10/2002	Bernstein Research, <i>Household International: Legal Risk to Business Model Increasing</i> , May 10, 2002	FRE 801, 802, 805	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.11			5/20/2002	Bernstein Research, <i>HI / Joe Luna of Washington State</i> , May 20, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-D.12			5/31/2002	Fox-Pitt Kelton, <i>April Data Point to Impending Peak in Losses</i> , May 31, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-D.13			5/31/2002	Wachovia, <i>Initiating Research Coverage With A Buy Rating (part 1)</i> , May 31, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.14			5/31/2002	Wachovia, <i>Initiating Research Coverage With A Buy Rating (part 2)</i> , May 31, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)



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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-D.15			6/20/2002	CIBC World Markets, <i>Household International - Business diversification and efficiency should drive steady earnings growth</i> , June 20, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-D.16			6/28/2002	JP Morgan, <i>Household International: 2Q02 Preview &amp; Update</i> , June 28, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E				Analyst Reports between July 1, 2002 and September 30, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-E.1			7/1/2002	Credit Suisse, <i>Specialty Finance - Second quarter earnings preview</i> , July 1, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document
DX0001-E.2			7/1/2002	Deutsche Bank, <i>2Q02 Quarterly preview - Fundamentals steady, stocks not</i> , July 1, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.3			7/17/2002	Banc of America (Mayer), <i>HI: Reports in Line Quarter: Trends Mixed (Part 1 of 2)</i> , July 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.4			7/17/2002	Banc of America (Mayer), <i>HI: Reports in Line Quarter: Trends Mixed (Part 2 of 2)</i> , July 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.5			7/17/2002	Bear Stearns, <i>Household International (HI-\$46.10) – Buy, Solid Loan Growth, Increased Liquidity; Stock Weakness not Reflective of Favorable Business Trends</i> , July 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.6			7/17/2002	CIBC World Markets, <i>In-Line 2Q02 EPS Offer No Surprises; Maintain Buy</i> , July 17, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-E.7			7/17/2002	Fox-Pitt Kelton, <i>Regulatory Uncertainty Causes Big Problems For Consumer Finance Group</i> , July 17, 2002	FRE 801, 802	FRE 801(c)
DX0001-E.8			7/18/2002	Banc One Capital Markets, <i>Solid Second Quarter Earnings</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.9			7/18/2002	Deutsche Bank (Alpert), <i>Household International Solid 2Q performance - Part 1/2</i> , July 18, 2002	FRE 801, 802	FRE 801(c)

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DX0001-E.10			7/18/2002	Deutsche Bank (Alpert), <i>Household International Solid 2Q performance - Part 2/2</i> , July 18, 2002	FRE 801, 802	FRE 801(c)
DX0001-E.11			7/18/2002	Fox-Pitt, <i>Household International - Makes numbers but focus has changed</i> , July 18, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-E.12			7/18/2002	Merrill Lynch (Hughes), <i>Household Intl: Nice quarter, wrong day part 1</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.13			7/18/2002	Merrill Lynch (Hughes), <i>Household Intl: Nice quarter, wrong day part 2</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.14			7/18/2002	Salomon Smith Barney, <i>HI: 2Q02 EPS a mixed bag; trimming ests, target to be prudent (part 1)</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.15			7/18/2002	Salomon Smith Barney, <i>HI: 2Q02 EPS a mixed bag; trimming ests, target to be prudent (part 2)</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.16			7/18/2002	Salomon Smith Barney, <i>HI: 2Q02 EPS a mixed bag; trimming ests, target to be prudent (part 3)</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.17			7/18/2002	Warburg, <i>Household International - Consumer finance</i> , July 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.18			7/26/2002	Bear Stearns, <i>Capital One Financial – Attractive; Some light shed on regulatory issues: MOU may be of less concern than new FFIEC guidelines</i> , July 26, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.19			7/26/2002	Credit Suisse First Boston, <i>Meeting Should Begin to Address Concerns – Part 1</i> , July 26, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.20			7/26/2002	Credit Suisse, <i>The most puzzling bond of all Household Finance hits historic wides on no news- Look no further than Capital One</i> , July 26, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.21			7/31/2002	Morgan Stanley, <i>Channel Check: Surprisingly Strong Subprime Growth</i> , July 31, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.22			8/5/2002	Portales partners (Ryan), <i>Household International - What is wrong with this picture</i> , August 5, 2002	FRE 801, 802, 805	FRE 801(c)

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DX0001-E.23			8/14/2002	Goldman Sachs, <i>HI: Reduce 02 and 03 by \$0.20 each. Maintain RL</i> , August 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.24			8/14/2002	JP Morgan, <i>Household International: Restating financial statements</i> , August 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.25			8/14/2002	Salomon Smith Barney, <i>HI: Certifies statements, but restates \$386 million past income</i> , August 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.26			8/14/2002	William Blair, <i>Household International restates financials for credit card business</i> , August 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.27			8/15/2002	Bear Stearns, <i>Restatement Should Have Modest Impact On Household. New Capital Ratio Targets And Funding Challenges Likely to Impact EPS Next Year Though part 1</i> , August 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.28			8/15/2002	Bear Stearns, <i>Restatement Should Have Modest Impact On Household. New Capital Ratio Targets And Funding Challenges Likely to Impact EPS Next Year Though part 2</i> , August 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.29			8/15/2002	Lehman Brothers, <i>Household International: 10Q review &amp; earnings restatement</i> , August 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.30			8/15/2002	UBS Warburg, <i>Household - Earnings restatement not significant</i> , August 15, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.31			8/16/2002	AG Edwards, <i>HI restates earnings due to accounting issues - estimates and PO change</i> , August 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.32			8/22/2002	Fox-Pitt Kelton, <i>The Card Game – Credit Card Monthly</i> , August 22, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.33			8/22/2002	Credit Suisse, <i>Auto Finance - Interpreting the Trust Data - moving beyond the curves</i> , August 22, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-E.34			8/27/2002	Keefe, Bruyette & Woods, <i>Initiating Coverage of Household International With a Market Perform Rating Yet Another Un-Investable Situation</i> , August 27, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-E.35			9/12/2002	Morgan Stanley, <i>Diversified Financials - Weekly Pulse</i> , September 12, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document
DX0001-E.36			9/13/2002	Morgan Stanley, <i>Diversified Financials - Correction: Weekly Pulse</i> , September 13, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-E.37			9/17/2002	Credit Suisse, <i>Competitors' woes spill over (Again) into household</i> , September 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document
DX0001-E.38			9/18/2002	UBS Warburg, <i>Household International: Reducing Price Target To \$41</i> , September 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.39			9/18/2002	AG Edwards, <i>Household International - Lowering rate on HI to hold from buy</i> , September 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-E.40			9/18/2002	Lehman Brothers, <i>Specialty Finance - Industry Update</i> , September 18, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-E.41			9/22/2002	CIBC World Markets, <i>Lowering Price Target On Persistent Headline Risk, But Maintaining SP Rating</i> , September 22, 2002	No objection	N/A
DX0001-E.42			9/30/2002	Lehman Brothers, <i>Household International: Change of Earnings Forecast: Revising Estimates; Updating model</i> , September 30, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-F				Analyst Reports after October 1, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	N/A
DX0001-F.1			10/3/2002	CIBC, <i>Specialty Finance-Third Quarter 2002 preview</i> , October 3, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.2			10/3/2002	Deutsche Bank, <i>3Q02 Quarterly Preview Proceed with caution</i> , October 3, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-F.3			10/4/2002	JP Morgan, <i>Household International: 3Q02 Preview &amp; Update</i> , October 4, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.4			10/4/2002	Credit Suisse, <i>Specialty Finance- Third quarter earnings preview</i> , October 4, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0001-F.5			10/7/2002	CIBC World Markets, <i>Household International - Downgrading to SU on downside risk related to fundamentals and valuation</i> , October 7, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)
DX0001-F.6			10/8/2002	UBS Warburg, <i>Household: Lowering Target; Still Creating Value Despite Lower Growth</i> , October 8, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-F.7			10/9/2002	Deutsche Bank, <i>Household International: Widening spreads impacting stock and group</i> , October 9, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.8			10/10/2002	Morgan Stanley, <i>Worth a Look</i> , October 10, 2002	FRE 801, 802, 805	FRE 801(c)
DX0001-F.9			10/11/2002	William Blair, <i>Household Reaches Settlement, But Lowering Estimates, Long-term Growth Rate</i> , October 11, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.10			10/16/2002	CIBC World Markets, <i>3Q02 Operating EPS Upside Surprise; Upgrading To Sector Performer</i> , October 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0001-F.11			10/16/2002	Piper Jaffray, <i>Follows Up Settlement Announcement with Good Earnings Performance</i> , October 16, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.12			10/25/2002	Deutsche Bank, <i>New Capital in Attempt to Restore Confidence</i> , October 25, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.13			11/14/2002	Deutsche Bank, <i>It's All About Funding</i> , November 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0001-F.14			9/9/2003	Fitch Ratings, <i>Credit Card ABS Midyear Review and Update</i> , September 9, 2003	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0002			10/1/2001	"The All-America Research Team," Institutional Investor	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0003			10/5/2001	"Card Cos.' 3Q Seen Solid, But '02 Views Matters Most", Tara Siegel Bernard, Dow Jones Newswires	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0004			10/12/2001	"Update 1-Credit card co Shares Fall After Providian warns," F. Brinley Bruton, Reuters	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0005			10/13/2001	"Providian Warning Prompts Sell-Off," Leslie Earnest, Los Angeles Times	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0006			10/15/2001	"Providian's 3Q Slump Shows 2-Tier Sector," Lavonne Kuykendall, American Baker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0007			10/17/2001	"Capital One, Others' Shares Bounce on Earnings," Reuters	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0008			10/18/2001	"3Q Earnings: Stellar 3Q at Metris, Household, Capital One," Lavonne Kuykendall, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0009			10/19/2001	"Update 1-Providian Shares Tumble After Poor Earnings," Reuters	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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DX0010			10/31/2001	"Are Cards Stronger Than Consumer Confidence?" Matthias Rieker, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0011			11/9/2001	"Abusive Lending," City News Service	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0012			11/15/2001	"Credit Card Issuer Providian Financial suffers another Wall Street beating," Michael Liedtke, Associated Press	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0013			12/12/2001	"Credit Card Charge-Offs Increased in October," Business Wire	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0014			12/13/2001	"Stocks Overcome Early Torpidity As P&G, Toll Brothers See Gains", Robert O'Brien, The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0015			1/1/2002	"Top 25 B&C Lenders in 2001," Inside B&C Lending	FRE 401, 402, 403, 702, 703, 801, 802, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document
DX0016			1/16/2002	"Household Reports Record Quarterly and Full-Year Net Income," PR Newswire	No objection	N/A
DX0017			1/21/2002	"Fitch Sees Growing Consumer Debt Woes," National Mortgage News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0018			1/28/2002	"Doubting Tyco," Jonathan R. Laing, Barron's	FRE 801, 802, 805	FRE 801(c)
DX0019			1/28/2002	"Update 2-Credit Card Stocks Fall on Metris Worries," Reuters News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0020			1/28/2002	"Credit card stocks fall on Metris, sub-prime worries," Reuters News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0021			1/28/2002	"The Bear that Roared: How Short-Seller Jim Chanos helped expose Enron", Johnathan R. Laing, Barron's	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); Publicly available document



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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0022			2/1/2002	"Household Gets Rapped," Paul Muolo, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0023			2/1/2002	"Household Gets Rapped," US Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0024			2/5/2002	"In Brief: Fed Survey Finds More Mortgage Demand," Michele Heller, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0025			2/5/2002	"US Banks Report Tightened Lending Rules," The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0026			2/11/2002	"A Rough Ride Ahead: More Defaults in Consumer Loans," Adam Tempkin, Asset Securitization Report	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0027			2/11/2002	"Banking Regulators Concerned About Subprime Loan Performance," Richard Cowden, BNA's Banking Report	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0028			2/11/2002	"FDIC Alerts Banks to Subprime Woes," National Mortgage News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0029			2/18/2002	"A Rough Ride Ahead: More Defaults in Consumer Loans: Part II: Is the Sky Falling...or is it just tiering?" Adam Tempkin, Asset Securitization Report	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0030			2/20/2002	"New Data No Boost to Card Firms," W.A. Lee, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0031			2/21/2002	"Household Gets Rapped," Banking Wire	FRE 801, 802, 805	FRE 801(c)
DX0032			2/21/2002	"Consumer Finance Firms' Outlook Bleak, Fitch Says," Erick Bergquist, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)



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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0033			2/21/2002	"Credit-Card Companies Are Raising Rates," Ruth Simon, The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0034			2/25/2002	"DC Council Approves New Predatory Law," National Mortgage News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0035			2/27/2002	"Credit Card Companies Rally on Greenspan," Reuters News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0036			3/26/2002	"Worries About Sub-Prime Market Drag Down Lenders, Card Issuers Financial Services: Some Analysts Fear that Rising Interest Rates Could Lead to Higher Default Rate," E. Scott Reckard, Los Angeles Times	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0037			Apr-02	"Shape Up, Issuers!" Linda Punch, Credit Card Management	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0038			4/15/2002	"In Brief: FDIC: Subprime is Biggest Immediate Risk," Damian Paletta, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6)
DX0039			4/17/2002	"Household Reports Record First Quarter Net Income," PR Newswire	No objection	N/A
DX0040			4/18/2002	"As NextCard Eyes Closing, OCC Takes Metris in Hand," Lavonne Kuykendall and Matthias Rieker, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0041			4/22/2002	"A Wild Ride with Subprime Lenders; You'd be Hard Pressed to Find a More Volatile Sector than Lenders that Cater to High-Risk Borrowers. Got Strong Nerves?" Mara Der Hovanesian, Business Week	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0042			4/25/2002	"Keeping the Lid on Subprime Exposure," Burney Simpson, Credit Card Management	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0043			4/29/2002	"Credit Card Delinquency Soars," CNNfn: Markets Impact	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0044			4/29/2002	"Fitch Ratings Report: Finance Company Capital Standards – 2002," Business Wire	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0045			5/10/2002	"Panelist Discussion - Michael Farr, Charles Gabriel, Greg Valliere," Wall Street Week	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0046			6/3/2002	"Rating Agencies Worry Over High Credit Card Losses," BondWeek	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0047			6/14/2002	"Regulatory Crackdown Near for Card Issuers," Rob Garver, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0048			6/28/2002	"NY Bill to Drive Subprime Out of State?" Kyriaki Venetis, Origination News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0049			7/1/2002	"Card Cos 2Q EPS Produce Mixed Bag; Trends Mostly Stable," Tara Siegel Bernard, Dow Jones News Service	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0050			7/11/2002	"HD in Brief: Chargeoffs Send Capital One Stock Down", Lavonne Kuykendall, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6)
DX0051			7/17/2002	"Household Reports Record Second Quarter Results on Strong Receivables Growth," PR Newswire, Dow Jones	FRE 801, 802, 805	FRE 801(c)
DX0052			7/17/2002	"UPDATE 2-Credit card stocks dive on consumer default fears," Philip Klein, Reuters News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0053			7/18/2002	"2Q Earnings: Another Record at Household as 2Q Net Increases by 17%," Erick Bergquist, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0054			7/18/2002	"Capital One Sees Shares Fall 40% On Fed Warning," Carrick Mollenkamp, The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0055			7/18/2002	"Regulatory Move Causes Drop in Capital One Shares," Bloomberg News and The New York Times	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0056			7/18/2002	"Are None Immune in Card Crackdown?" W.A. Lee, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0057			7/19/2002	"Subprime Forecast: Defaults Will Edge Up On Today's Loans," Ted Cornwell, Mortgage Servicing News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0058			7/23/2002	"Subprime Loans Will Be Covered by Federal Rules," Carrick Mollenkamp, The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0059			7/26/2002	"Feds Will Keep Subprime Data Secret at First," American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0060			7/30/2002	"In Brief: Specialty Firms Win Big in Stock Rally," Matthias Rieker, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0061			8/2/2002	"Watch Out for the Double-Dip: The Economy Has Hit an Air Pocket and Some Fear the Worst," CNNMoney	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0062			8/6/2002	"Cox Communications Falls 19%, Comcast 14% as Market Slides," Robert O'Brien, The Wall Street Journal	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0063			8/7/2002	"AmeriCredit Corp. Shares Fall Sharply On Delinquency Concerns-DJ," Reuters Significant Developments	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0064			8/15/2002	"A double dip? – Monetary policy in the United States," The Economist	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0065			8/23/2002	"US puts screws on consumer credit," The Australian Financial Review	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0066			8/27/2002	"DJ. WSJ (8/28) Abreast Of The Market - Stock Prices Struggle Tue," Oster Dow Jones Select	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0067			9/4/2002	"Stocks Slump Across the Board; Major Indexes Off 4% as Fears Linger About Economy, Iraq and Accounting," Ben White, The Washington Post	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0068			9/16/2002	"Delinquencies Rising, but Auto ABS Structures Sound, Kevin Donovan, Asset Securitization Report	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0069			9/17/2002	"MGIC Warning Spurs an Industrywide Stock Drop," Tommy Fernandez, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0070			9/23/2002	"Finance Co. Bonds Slide Despite 41-Yr Low In Tsy Yields," Christine Richard, Dow Jones Capital Markets Report,	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0071			10/7/2002	"Credit Cards 3Q Results Mixed; Focus On New Regulations," Tara Siegel Bernard, Dow Jones News Service	FRE 801, 802, 805	FRE 801(c)
DX0072			10/7/2002	"DJ. US Late Market Comment -4 - American Express Falls 7%," Oster Dow Jones Select	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0073			10/7/2002	"U.S. Consumer Lender companies' Stocks Slide," Reuters	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0074			10/7/2002	"UPDATE 1-U.S. financial stocks fall in weak economy," Reuters News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0075			10/8/2002	"Finance company spreads widen," Jenny Wiggins, Financial Times	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0076			10/16/2002	"Household Reports Operating New Income of \$1.17 per share for the Third Quarter," PR Newswire, Dow Jones	FRE 801, 802, 805	FRE 801(c)
DX0077			10/29/2002	"The 2002 All-America Research Team," Institutional Investor	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0078			1/1/2003	"Top 25 B&C Lenders in 2002," Inside B&C Lending	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0079			3/24/2003	"Top Subprime Lenders in 2002," National Mortgage News	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0080			3/4/1997	Household Consumer Loan Trust 1997-1, Prospectus (Form 424B1) (March 4, 1997)	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0081			11/14/2000	Household International Form 10-Q for the period ended September 30, 2000	FRE 401, 402, 403	FRE 401, 403
DX0082			5/9/2001	Household International Form 10-Q for the period ended March 31, 2001	No objection	N/A
DX0083			8/10/2001	Household International Form 10-Q for the period ended June 30, 2001	No objection	N/A
DX0084			11/14/2001	Household International Form 10-Q for the period ended September 30, 2001	No objection	N/A
DX0085			3/13/2002	Household International Form 10-K for the year ended December 31, 2001	No objection	N/A
DX0086			5/10/2002	Household International Form 10-Q for the period ended March 31, 2002	No objection	N/A
DX0087			8/14/2002	Household International Form 10-Q for the period ended June 30, 2002	No objection	N/A
DX0088			10/11/2002	Household International Form 8-K dated October 11, 2002 with Exhibits 99.1 and 99.2	FRE 801, 802, 805	FRE 803(6); 801(c)
DX0089			10/24/2002	Household International Form 10-Q for the period ended September 30, 2002	No objection	N/A
DX0091			1/31/2001	"Expanded Guidance for Subprime Lending Programs," FDIC, January 31, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0092	FI-HOUSEHOLD00047	FI-HOUSEHOLD00050	11/29/2001	"Household Automotive Trust 2001-3," Fitch (Nieliwocki & Reese), November 29, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901; FRCP 26	FRE 401, 403, 703, 801(c), 902(6); publicly available document
DX0093			11/29/2001	"Agencies Adopt Recourse, Direct Credit Substitutes and Residual Interests Final Rule," Board of Governors of the Federal Reserve System and FDIC Joint Press Release, November 29, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0094	FI-HOUSEHOLD00333	FI-HOUSEHOLD00336	1/11/2002	"Fitch Affirms Household International, Lowers HFC, Rtg Outlook To Negative," Fitch, January 11, 2002	FRE 801, 802, 805	FRE 801(c)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0095			2/27/2002	"Monetary Policy Report to the Congress," Board of Governors of the Federal Reserve System, February 27, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0096			Mar 2002	"Subprime Markets, the Role of GSEs, and Risk- Based Pricing," Kenneth Temkin, Jennifer E. H. Johnson, and Diane Levy U.S. Department of Housing and Urban Development, March 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0097			6/20/2002	"Current Economic and Financial Conditions: Recent Developments," Prepared for the Federal Open Market Committee by the staff of the Board of Governors of the Federal Reserve System, June 20, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0098			7/22/2002	"Federal Financial Institution Regulators Draft Guidance on Credit Card Lending," Board of Governors of the Federal Reserve System Joint Press Release, July 22, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0099	FI-HOUSEHOLD 00348	FI-HOUSEHOLD 00351	8/14/2002	"Fitch affirms Household at 'A' following announcement," Fitch August 14, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0100			1/1/2003	"The 2001 Recession: How Was It Different and What Developments May Have Caused It?" Kevin L. Kliesen, Federal Reserve Bank of St. Louis Review 85, no. 1 (2003)	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0101			2/11/2003	"Monetary Policy Report to the Congress," Board of Governors of the Federal Reserve System, February 11, 2003	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(5)
DX0102			3/18/2003	"The Division of Supervision and Consumer Protection's Examination Assessment of Subprime Lending," Office of Inspector General, March 18, 2003	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(1)
DX0103			7/17/2003	"Business Cycle Dating Committee," National Bureau of Economic Research, July 17, 2003	FRE 401, 402, 403, 702, 703, 801, 802, 805, 901	FRE 401, 403, 703, 801(c), 902(6)
DX0104	PLF-G 000001	PLF-G 000609		Glickenhause & Company Trading Records	FRE 401, 402, 403	FRE 401, 403
DX0105	HHS-ED 005115	HHS-ED 005116	10/22/1999	Memo from Ancona to Schoenholz re: Long-Term Liquidity	FRE 401, 402, 403, 801, 802, 805; FRCP 34	FRE 401, 403, 803(6)
DX0106	HHS 02859223	HHS 02859229	8/8/2001	Memo from Schoenholz to Gilmer re: Financial Targets 2002 Through 2004	FRE 401, 402, 403, 801, 802, 805, 901	FRE 401, 403, 803(6), 801(c), 901(b)

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0107	HHS 03402565	HHS 03402567	10/26/2001	Memo from D. Schoenholz subject: Risk Based Capital, dated October 26, 2001	FRE 401, 402, 403, 801, 802, 805, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6)
DX0108	HI KPMG 011146	HI KPMG 011148	11/11/2001	Minutes of the Meeting of the Finance Committee of Household International, Inc.	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0109	HHS 02867898	HHS 02867989	1/29/2002	Household International 2002 Operating Plan -January 2002 Board of Directors Meeting Package	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c), 803(6)
DX0110	HHS 03033274	HHS 03033306	1/29/2002	Managing Credit Quality in a Recession Presented to the Board of Directors - Part of January 2002 Board of Directors Meeting Package	FRE 106, 401, 402, 403, 801, 802, 805, 901	FRE 401, 403, 803(6), 801(c), 901(b)
DX0111	HHS 01232632	HHS 01232633	2/14/2002	Email subject: OCC Update from Margaret A. Sprude, dated February 14, 2002	FRE 401, 402, 403, 801, 802, 805, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 801(c), 803(6)
DX0112	HHS-ED 485746	HHS-ED 485746	7/8/2002	Message from Barney Moss subject: Equity Forwards, dated July 8, 2002	FRE 401, 402, 403, 801, 802, 805, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6), 801(c)
DX0113	HI KPMG 017706	HI KPMG 017708	11/11/2002	Topics to be Covered at November 11, 2002 Household International Meeting of the Finance Committee	FRE 106, 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6)
DX0114	HHS 02127692	HHS 02127702	4/6/1998	Blair, William & Co. (Gomberg), <i>Comments Following Household International's Financial Relations Conference</i> , dated April 6, 1998	FRE 106, 401, 402, 403, 801, 802, 805, 901	FRE 401, 403, 801(c), 901(b)
DX0115	H003854	H003856	7/22/1998	Bulletin Board from Linda Maples, Ron Ferrari and Tom Detelich to All U.S. Sales Offices and HFCPS Department Managers re: Bi-Weekly Payment Worksheet, dated July 22, 1998	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0116	HHT 0006853	HHT 0007018	11/24/1998	Household Automobile Revolving Trust I, Securitization Prospectus (Form 424B1), dated November 24, 1998	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)



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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0117	HHS 02379170	HHS 02379177	1999	Sales Compensation Plan Rules and Regulations, dated 1999	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0118	HHS 03388820	HHS 03388820	6/10/1999	Email from Gary Gilmer to Beth Boeke re: the prohibition against loan flipping, dated June 10, 1999	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0119	HHS 02129843	HHS 02129845	7/12/1999	ABN AMRO, (Napoli & Kaster), <i>Positive Trends Almost Across the Board: Reiterate Buy, Raising Estimates</i> , dated July 12, 1999	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0120	HHS 02404908	HHS 02404909	7/13/1999	Optional Credit Insurance Disclosure, dated July 13, 1999	FRE 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6), 901(b)
DX0121	HHS 02390237	HHS 02390239	7/13/1999	Loan Repayment and Security Agreement, dated July 13, 1999	FRE 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6)
DX0122	HHS 02200198	HHS 02200198	Aug-99	HFC/Beneficial Insurance Sales Code of Conduct, dated August 1999	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0123	HHS 02878142	HHS 02878142	10/20/1999	Email from Patrick Zenzola to Denis O'Toole, Robin Allcock, Tom Detelich, Kathleen Curtin, Tom Schneider and Nancy Bromley re: Meeting with CA Department of Corporations to discuss AMTPA, dated October 20, 1999	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0124	HHT 0017932	HHT 0018060	11/16/1999	HFC Revolving Corporation, Prospectus Supplement (Form 424B5), dated November 16, 1999	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0125	HHS 03418585	HHS 03418585	12/8/1999	Email from Gary Gilmer to all HFC & Beneficial BSMs & Processing Center Management re: bulletin boards and the importance of compliance, dated December 8, 1999	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0126	H011679	H011685	1/1/2000	2000 Rules and Regulations to Consumer Finance Sales Incentive Compensation Program, dated January 1, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0127	HHT 0014103	HHT 0014172	2/15/2000	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B3), dated February 15, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0128	HHT 0014173	HHT 0014243	2/18/2000	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B4), dated February 18, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0129	HHS 02749771	HHS 02749775	2/29/2000	HFC/Beneficial Uniform Operational Manual: Daily Audit Requirements, dated February 29, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)



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DX0130	HHS 02128206	HHS 02128208	3/16/2000	Legg Mason Wood Walker, Inc. (Sochol), <i>Household - We Do Consumer Finance Right, Initiating Coverage with Outperform Rating</i> , dated March 16, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0131	HHT 0000038	HHT 0000039	4/6/2000	Legg Mason Wood Walker, Inc. (Sochol), <i>Executing Well on the Vision</i> , dated April 6, 2000	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0132	HHS 02362563	HHS 02362563	4/10/2000	Email from Gary Gilmer to All HFC and Beneficial Employees re: Predatory Lending, dated April 10, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0133	HHS 03250178	HHS 03250179	4/25/2000	"ACORN Takes on Nation's Largest Consumer Finance Companies" Press Release, ACORN	No objection	N/A
DX0134	HHS 02866729	HHS 02866730	5/1/2000	Email from Gary Gilmer to All Household Employees re: Predatory Lending, dated May 1, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0135	HHT 0014385	HHT 0014456	6/9/2000	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B3), dated June 9, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0136	HHT 0014313	HHT 0014384	6/15/2000	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B2), dated June 15, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0137	HHS 02880774	HHS 02880775	7/19/2000	Goldman Sachs Investment Research Department, <i>Household International: Maintain Aggressive RL Rating on Excellent 2nd Quarter</i> , dated July 19, 2000	FRE 401, 402, 403, 801, 802, 901	FRE 401, 403, 801(c), 902(6)
DX0138	HHT 0016003	HHT 0016070	8/25/2000	Household Auto Receivables Corp., Prospectus Supplement (Form 424B3), dated August 25, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0139	HHT 0014457	HHT 0014525	8/31/2000	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B2), dated August 31, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0140	HHS 02911230	HHS 02911232	9/20/2000	Letter from William Aldinger to Members of the Board of Directors re: ACORN Protests, attaching Household's media statement on Predatory Lending, dated September 20, 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0141	HHS 02227691	HHS 02227713	Oct-00	Ethical Lending - Service Staff Meeting Manager's Guide, dated October 2000	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)

Defendants' Exhibit List

April 22, 2016

Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0142	HHS 02883064	HHS 02883066	10/2/2000	Memo from Paul Creatura, Lisa Sodeika to Larry Bangs, et al. re Product Restructuring, dated October 2, 2000	FRE 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6), 901(b)
DX0143	HHS 02188267	HHS 02188269	11/11/2000	Loan Repayment and Security Agreement, dated November 11, 2000	FRE 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6), 901(b)
DX0144	HHS 03103477	HHS 03103500	11/13/2000	Household International Annual Report of the General Counsel to the Audit Committee with Respect to Household International's Business Principles, dated November 13, 2000	FRE 106, 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6), 901(b)
DX0145	HHS 02379282	HHS 02379292	1/1/2001	The 2001 Sales Compensation Plan: Rules and Regulations, effective January 1, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0146	HHS 02911338	HHS 02911339	1/15/2001	Email from Gary Gilmer to Larry Bangs re: ACORN Complaints, dated January 15, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0147	HHS 02939650	HHS 02939666	1/16/2001	Memo from Lisa Sodeika to Gary Gilmer and Tom Detelich re: Customer Reviews (ACORN), attaching customer reviews, dated January 16, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0148	HHT 0014244	HHT 0014312	3/2/2001	Household Auto Receivables Corporation, Prospectus Supplement (Form 424B2), dated March 2, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0149	HHT 0000119	HHT 0000124	3/8/2001	Legg Mason (Sochol & Brendler), <i>HI: Picking UP Market Share and P/E Multiple Points</i> , dated March 8, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0150	HHT 0000125	HHT 0000139	3/14/2001	William Blair & Co. (Gomberg & Tibodeau), <i>Update Report</i> , dated March 14, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0151	HHS 03149124	HHS 03149147	3/29/2001	2001 Proxy Statement, dated March 29, 2001	No objection	N/A
DX0152	HHS 03436204	HHS 03436204	4/3/2001	Household Financial Relations Conference, Tape II, dated April 3, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0153	HHS 03436205	HHS 03436205	4/3/2001	DVD: Household Financial Relations Conference, Marriott O'Hare, Tape III, dated April 3, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0154	HHS 03436202	HHS 03436202	5/8/2001	HH 2001 Annual Shareholders Meeting, dated May 9, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0155	AA061389	AA061392	5/8/2001	Minutes of 2001 Annual Meeting of Shareholders of Household International, Inc., dated May 8, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0156	HHS 02862773	HHS 02862776	5/10/2001	Memo from Ned Hennigan to Tom Detelich re: May 2001 Operating Results, dated May 10, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)

Defendants' Exhibit List

April 22, 2016

Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0157	HHT 0018061	HHT 0018202	5/11/2001	HFC Revolving Corporation, Prospectus Supplement (Form 424B5), dated May 11, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0158	HHS 02484488	HHS 02484488	5/24/2001	Bulletin Board from Rob O'Han to All HFC Sales Offices & HFCPS Management re: Prohibited Sales Practices, dated May 24, 2001	No objection	N/A
DX0159	HHS-ED 510577	HHS-ED 510584	5/25/2001	Business development visit report from DSM Robbins, dated May 25, 2001	FRE 106, 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0160	HHT 0000698	HHT 0000702	5/29/2001	"'Predatory' Lending Targeted: A State Senator Seeks to Protect Consumers from Exorbitant Interest Rate", Aurelio Rojas, Sacramento Bee	No objection	N/A
DX0161	HHS 02187244	HHS 02187245	6/5/2001	Email from Gary Gilmer to All HFC and Beneficial Employees re: Responsible Lending, dated June 5, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0162	HHS 03208037	HHS 03208038	6/7/2001	Email from Ned Hennigan to Dana M. Williams re: invitation to Responsible Lending Summit, dated June 7, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0163	HHS 02901940	HHS 02901940	6/12/2001	Email from Gary Gilmer to Kathleen Curtin, Lisa Sodeika, Larry Bangs, Walt Rybak, Craig Streem, Joe Vozar, Tom Detelich, Gregory Snyder and Denis O'Toole re: Illinois Pay Right Rewards, dated June 12, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0164	HHS 02942670	HHS 02942674	6/28/2001	Letter from Kevin Murphy, Deputy Commissioner of Minnesota Department of Commerce to Jordan Ash of ACORN re: Complaints Against Household Industrial Finance Company and Beneficial Loan and Thrift Company, dated June 28, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0165	H007414	H007415	7/2/2001	Customer Satisfaction Survey, dated July 2, 2001 and signed September 29, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0166	HHS 02251218	HHS 02251236	7/2/2001	Selling Mortgages Workshop, dated July 2, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0167	HHS 00030968	HHS 00030971	7/23/2001	Press Release, Household International Inc., Household International Redefines Best Practices in Subprime Lending, dated July 23, 2001	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0168	H008115	H008116	7/24/2001	Email from Gary Gilmer to All Household Employees re: Household's Best Practices Initiatives, dated July 24, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0169	HHS 03451881	HHS 03451925	7/24/2001	Letter from Tom Schneider to Arizona Financial Services Division re: response to Arizona Examination Report (attached), dated July 24, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0170	HHT 0002255	HHT 0002398	8/3/2001	HRSI Funding Inc II, Prospectus Supplement (Form 424B3), dated August 3, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0171	HHS-ED 578892	HHS-ED 578901	8/26/2001	Comprehensive audit report from DSM Matheis, dated August 26, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0172	HHT 0000743	HHT 0000745	9/12/2001	"PERA Urged to Drop Finance Firm Investment", Morgan Lee, Albuquerque Journal	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0173	HHS 02362549	HHS 02362549	10/3/2001	Email from Gary Gilmer to All Consumer Lending Employees re: Ethical Behavior, dated October 3, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0174	HI KPMG 034104	HI KPMG 034110	10/9/2001	Memo from Cliff Mizialko to Files re: Evaluation of the Adequacy of HI Credit Loss Reserves at September 30, 2001, dated October 9, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0175	HHS 03418104	HHS 03418106	10/18/2001	Letter from Tom Schneider to Sharon Dawes re: Antonio Ortega	FRE 106, 401, 402, 403, 801, 802, 901	FRE 401, 403, 803(6), 901(b)
DX0176	HHS03134299	HHS03134314	10/18/2001	E-mail Subject: FW: Gain-On-Sale- Calling On The Special Teams; Attachment Article Title: When the Going Gets Tough... The Accounting Department Gets Going	FRE 801, 802, 805, 901	FRE 803(6), 801(c), 901(b)
DX0177	FDIC-0881	FDIC-0883	11/12/2001	Memo from Mary Johnston to Robin Allcock re: Complaint Resolution / Rapid Response Team, dated November 12, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0178	HHS 02904751	HHS 02904752	11/15/2001	Press Release, Household International Inc., Household Responds to California Department of Corporations' Lawsuit, dated November 15, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0179	HHT 0000766	HHT 0000768	11/21/2001	"Household's Bum Rap?", Erick Bergquist, American Banker	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)
DX0180	HHT 0000250	HHT 0000252	12/13/2001	Deutsche Banc Alex. Brown Inc. (Alpert, St. Leger & Swanberg), <i>Detail on Credit Policies -- We See No Problem</i> , dated December 13, 2001	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)
DX0181	HHS-ED487851	HHS-ED487851	12/19/2001	E-mail chain between P. Makowski and D. Schoenholz, subject: No Subject, last dated December 19, 2001	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0182	HHT 0000782	HHT 0000784	12/29/2001	"The Mortgage Bite: Some Lenders Prey on Borrowers" Marc Albert, San Mateo County Times	FRE 401, 402, 403, 801, 802, 805, FRCP 26	FRE 401, 403, 703, 801(c); publicly available document
DX0183	ILAG 001124	ILAG 001150	2002	Illinois customer complaints and correspondence re: customer complaints and various customer loan forms, regarding May 2002 loan	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0184	HHS 02859015	HHS 02859023	1/3/2002	Letter from Robin Allcock to Russell Spain III (State Corporation Commission, Bureau of Financial Institutions, Virginia) re: response to Virginia Report of Examination, dated January 3, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0185	HHS 02880203	HHS 02880205	1/17/2002	Merrill Lynch Global Securities Research (Hughes), <i>Household International Inc (HI/NYSE) Good Numbers, Tough Audience</i> , dated January 17, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)
DX0186	HHS 00089210	HHS 00089261	1/28/2002	Email subject: Senior Management Meeting Presentation from Paul A. Makowski, dated January 28, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0187	HHT 0000286	HHT 0000288	2/8/2002	Ventana Capital, LLC (Ryan), <i>More Is Likely To Come From Recent Investigations</i> , dated February 8, 2002	FRE 401, 402, 403, 702, 703, 801, 802, 805	FRE 401, 403, 703, 801(c)
DX0188	H008109	H008112	4/8/2002	Fax Memo from Tom Detelich to Rob O'Han re: Examples of forms provided to Bellingham customers, including handwritten notes from Gary Gilmer and Lisa Sodeika, dated April 8, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0189	HHS 02135255	HHS 02135282	4/9/2002	Household International 2002 Proxy Statement, dated April 9, 2002	No objection	N/A
DX0190	HHS 03424557	HHS 03424566	4/9/2002	Memo from Ned Hennigan to Tom Detelich re: March 2002 operating results, dated April 9, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0191	HHS 03031911	HHS 03031916	5/14/2002	Minutes of 2002 Annual Meeting of Shareholders, dated May 14, 2002	FRE 401, 403, 403	FRE 401, 403
DX0192	HHS 02868552	HHS 02868552	5/17/2002	Email from Robin Allcock to Kathleen Curtin, Lisa Sodeika and Donna Taillon re: Expanded Report of Examination, dated May 17, 2002	FRE 106	
DX0193	HHS 02904454	HHS 02904455	5/20/2002	Email from Gary Gilmer to All Consumer Lending Employees re: Responsible Lending, dated May 20, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0194	HHS 02857664	HHS 02857689	5/21/2002	Letter from Robin Allcock to Paul Swierczak (Chief Examiner, New Jersey Department of Banking and Insurance) re: response to New Jersey Report of Examination, dated May 21, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0195	HHS 03418222	HHS 03418243	6/10/2002	Email from Lisa Sodeika to Stephen Hicks, Tom Detelich, Kenneth Walker, Rob O'Han, Mike Eden, Ned Hennigan, Calo Bucaro re: 2001 & 2002 complaints involving "terms of contract", dated June 10, 2002	FRE 106, 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0196	HHS 02904471	HHS 02904473	6/13/2002	Memo from Gary Gilmer to Bill Aldinger re: Regulatory Responses, dated June 13, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0197	HHS 02944123	HHS 02944203	6/28/2002	Response to Washington Department of Financial Institutions Expanded Report of Examination for Household Finance Corporation III, dated June 28, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0198	HHS 00035952	HHS 00035955	7/10/2002	Email subject: HAF Delinquency and Chargeoff Trends from Tim R. Condon, dated July 10, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0199	HHS-ED 016421	HHS-ED 016433	7/24/2002	Effective Rate Complaint Review: Regulatory Compliance Risk Management Department - Summary of Findings, Updated July 24, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0200	HHS 03053358	HHS 03053361	8/12/2002	Letter from OCC to David Schoenholz re: appeal of prepaid asset account decision, dated August 12, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 801(c)
DX0201	HHS 02075651	HHS 02075651	8/13/2002	Email from Bill Aldinger to All Household Employees, Subject: James Kauffman Named SVP-Compliance & Policy, dated August 13, 2002	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)

Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0202	HI KPMG 006433	HI KPMG 006460	8/27/2002	KPMG Audit of the Reserve For Credit Losses as of December 31, 2000 and 2001 and the Related Provision for Credit Losses for the years ended December 31, 1999, 2000 & 2001, dated August 27, 2002	FRE 401, 402, 403, 801, 802, 805, 901	FRE 401, 403, 801(c), 803(6)
DX0203	HHS 02935088	HHS 02935093	9/27/2002	Letter from Stephen Hicks to Amy Adams, dated Sept. 27, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0204	HHS 03441978	HHS 03442010	11/21/2002	Letter from Stephen Hicks to Terry Meyer (Chief Examiner, Minnesota Department of Commerce) re: response to Minnesota Report of Examination, dated November 21, 2002	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6)
DX0205			2/27/2009	"ViewPoint: Use Receivership to Restore Confident", Ghiglieri & Krasne, American Banker	FRE 401, 402, 403, 801, 802	FRE 401, 403, 801(c)
DX0206	HHS 02483587	HHS 02483587		Video: HFC Managing Trust	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6), 801(c)
DX0207	HHS 02483593	HHS 02483593		Video: Household International HFC/Beneficial "The Home Equity Advantage"	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6)
DX0208	HHS 02889373	HHS 02889385		Consumer Lending: Human Resources & Training Presentation	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6), 801(c)
DX0209	HHS 02905385	HHS 02905394		Responsible Lending: Household Initiatives	FRE 401, 402, 403, 801, 802, 805	FRE 401, 403, 803(6), 801(c)
DX0210	HHS 03452300	HHS 03452300		DVD: USCF 2001 Conference, Meeting in a Box	FRE 401, 402, 403, 801, 802	FRE 401, 403, 803(6), 801(c)
DX0211	HHS 03468204	HHS 03468235	2001	Household International 2001 Management's Discussion & Analysis and Financial Statements (Draft)	FRE 401, 402, 403, 801, 802, 901, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6), 901(b)
DX0212	HHS 03468236	HHS 03468310	2001	Household International 2001 Management's Discussion & Analysis and Financial Statements (Draft) with handwritten notes	FRE 401, 402, 403, 801, 802, 901, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6), 801(c), 901(b)



Defendants' Exhibit List

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Ex. No.	Bates Start	Bates End	Document Date	Document Title/Description	Plaintiffs' Objections	Defendants' Response to Objections
DX0213	HHS 03150384	HHS 03150421	3/11/2002	Letter from Steven L. McDonald to Audit Committee Members, dated March 11, 2002	FRE 401, 402, 403, 801, 802, 901, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6), 901(b)
DX0214	HHS 031468311	HHS 03468348	3/11/2002	Letter from Steven L. McDonald to Audit Committee Members, dated March 11, 2002	FRE 401, 402, 403, 801, 802, 901, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6), 801(c), 901(b)
DX0215	FI-HOUSEHOLD 00228	FI-HOUSEHOLD 00229	6/19/2001	Fitch, <i>Household Home Equity Loan Trust 2001-1</i> , June 19, 2001	FRE 401, 402, 403, 801, 802, 805, FRCP 26, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 801(c), publicly available document
DX0216	FI-HOUSEHOLD 00317	FI-HOUSEHOLD 00317	5/18/2001	"Fitch Rts Household HE Loan Trust \$716.7MM Asset-Bkd Crfs 2001-1," Alla Sirotic & Cheryl Glory, Fitch	FRE 401, 402, 403, 801, 802, 805, 901, FRCP 26, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 801(c), 901(b); publicly available document
DX0217	WF 001021	WF 001024	6/1/2001	Moody's Investors Service (Teicher & Workman Nonas), <i>Household Home Equity Loan Trust 2001-1 Closed-End Home Equity Loan Asset Backed Certificates, Series 2001-1</i> , June 1, 2001	FRE 401, 402, 403, 801, 802, 805, FRCP 26, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 801(c), publicly available document
DX0218	HHS 03266154	HHS 03266207	Oct-02	Household International Business Unit Report October 2002 from Steve McDonald to Joe Hoff	FRE 401, 402, 403, 801, 802, 805, LR 16.1, Final Pretrial Order Form, n.5	FRE 401, 403, 803(6)
DX0219	PLF-G 000610	PLF-G 000669		Glickenhause & Co. Form 13F Reports	FRE 401, 402, 403	FRE 401, 403
DX0220	PLF-G 000670	PLF-G 002097		Proofs of Claim and Releases for All Accounts Managed by Glickenhause & Co.	FRE 401, 402, 403	FRE 401, 403
DX0221	PLF-G 002098	PLF-G 002140		Glickenhause & Co. Account Activity in Household International	FRE 401, 402, 403	FRE 401, 403



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' WITNESS LIST**

**[Exhibit D-1 to [Proposed] Final Pretrial Order]**

Plaintiffs intend to call live the following witnesses:<sup>1</sup>

<b>Witness</b>	<b>Address</b>
1. Aldinger, William F.	c/o Katten Muchin Rosenman LLP Gil M. Soffer Dawn M. Canty 525 W. Monroe Street Chicago, IL 60661-3693
2. Detelich, Thomas	c/o Skadden, Arps, Slate, Meagher & Flom LLP R. Ryan Stoll 55 N. Wacker Drive Chicago, IL 60606
3. Devor, Harris <sup>2</sup>	Shectman, Marks, Devor PC 2000 Market Street, Suite 500 Philadelphia, PA 19103
4. Fischel, Daniel R. <sup>3</sup>	Compass Lexecon 332 S. Michigan Avenue Chicago, IL 60604
5. Ghiglieri, Catherine <sup>4</sup>	Ghiglieri & Company 2300 Cypress Point West Austin, TX 78746
6. Gilmer, Gary D.	c/o McDermott Will & Emery LLP David S. Rosenbloom C. Maeve Kendall 227 West Monroe Street Chicago, IL 60606
7. Rybak, Walter	c/o Skadden, Arps, Slate, Meagher & Flom LLP R. Ryan Stoll 55 N. Wacker Drive Chicago, IL 60606

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<sup>1</sup> In the event that any of the listed witnesses becomes unavailable, plaintiffs will call the witness via video deposition testimony and/or trial testimony.

<sup>2</sup> This witness will be offered as an expert.

<sup>3</sup> This witness will be offered as an expert.

<sup>4</sup> This witness will be offered as an expert.

<b>Witness</b>	<b>Address</b>
8. Schneider, Thomas	c/o Skadden, Arps, Slate, Meagher & Flom LLP R. Ryan Stoll 55 N. Wacker Drive Chicago, IL 60606
9. Schoenholz, David A.	c/o Jackson Walker L.L.P. Tim S. Leonard 1401 McKinney, Suite 1900 Houston, TX 77010
10. Stroom, Craig A.	c/o Skadden, Arps, Slate, Meagher & Flom LLP R. Ryan Stoll 55 N. Wacker Drive Chicago, IL 60606

Plaintiffs may call live the following witness:

<b>Witness</b>	<b>Address</b>
1. Household Custodian of Records	c/o Skadden, Arps, Slate, Meagher & Flom LLP R. Ryan Stoll 55 N. Wacker Drive Chicago, IL 60606

Plaintiffs intend to call the following witnesses via video deposition or trial testimony:<sup>5</sup>

<b>Witness</b>	<b>Address</b>
1. Bajaj, Mukesh Dr. (trial)	Defendants' expert witness from first trial:  c/o Cahill Gordon & Reindel LLP 80 Pine Street New York, NY 10005

---

<sup>5</sup> In the event that any of the listed witnesses becomes available, plaintiffs will call the witness live.

<b>Witness</b>	<b>Address</b>
2. Cross, Charles <sup>6</sup> (deposition)	c/o Gordon Thomas Honeywell Malanca Peterson & Daheim LLP Wells Fargo Plaza 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402
3. Hicks, Stephen (trial)	1228 Gregory Avenue Wilmette, IL 60091
4. Hueman, Dennis (deposition)	1806 Avenida Salvador San Clemente, CA 92672
5. Markell, Helen E. (trial)	c/o Richard M. Squire, Esq. Richard M. Squire & Associates, LLC One Jenkintown Station 115 West Avenue, Suite 104 Jenkintown, PA 19046
6. May, Todd (deposition)	90 S. Seventh Street 4200 Wells Fargo Center Minneapolis, MN 55402
7. O'Han, Robert (trial)	Represented by defense counsel at first trial:  c/o Cahill Gordon & Reindel LLP 80 Pine Street New York, NY 10005
8. Walter, Lewellyn (deposition)	1199 N. Terry Street Eugene, OR 97402

DATED: April 22, 2016

ROBBINS GELLER RUDMAN  
& DOWD LLP  
MICHAEL J. DOWD (135628)  
SPENCER A. BURKHOLZ (147029)  
DANIEL S. DROSMAN (200643)  
LUKE O. BROOKS (90785469)  
LAWRENCE A. ABEL (129596)  
HILLARY B. STAKEM (286152)

\_\_\_\_\_  
s/ Michael J. Dowd  
MICHAEL J. DOWD

<sup>6</sup> This witness will be offered as a non-retained expert.

655 West Broadway, Suite 1900  
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619/231-7423 (fax)

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Liaison Counsel

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF ILLINOIS**  
**EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

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**DEFENDANTS' OBJECTIONS TO PLAINTIFFS' WITNESS LIST**

**[Exhibit D-2 to [Proposed] Final Pretrial Order]**

<b>Witness</b>	<b>Objection</b>
Aldinger, William F.	No objection
Detelich, Thomas	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
Devor, Harris	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
Fischel, Daniel R.	No objection
Ghiglieri, Catherine	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
Gilmer, Gary D.	No objection
Ryback, Walter	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
Schneider, Thomas	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
Schoenholz, David A.	No objection
Streem, Craig A.	No objection
Household Custodian of Records	No objection

Bajaj, Mukesh (Dr.)	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because Dr. Bajaj is not a testifying expert witness on behalf of Defendants, and because he has not been retained as an expert for either party and has no “personal knowledge” to offer as a fact witness (FRE 602)
Cross, Charles	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial  Defendants also object to the characterization of this witness as an expert (FRE 702)
Hicks, Stephen	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial
Hueman, Dennis	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial
Markell, Helen E.	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial
May, Todd	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial
O’Han, Robert	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness’s anticipated testimony does not relate to issues in the retrial



Walter, Lewellyn	Irrelevant (FRE 401); Unfair Prejudice, Confusion of the Issues, Waste of Time (FRE 403) because the witness's anticipated testimony does not relate to issues in the retrial
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

## DEFENDANTS' WITNESS LIST

**[Exhibit D-3 to [Proposed] Final Pretrial Order]**

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendants hereby identify the following individuals whom they intend to call as witnesses at trial.

**Will Call**

1. Bradford Cornell
2. Allen Ferrell
3. Christopher M. James

**May Call**

1. William Aldinger
2. Edgar Ancona
3. Gary Gilmer
4. James Glickenhau (as corporate representative for Lead Plaintiff)
5. David Schoenholz
6. Craig Streem

Defendants note that their “May Call” witness list may further narrow in response to the Court’s pretrial rulings and/or the outcome of the parties’ efforts to enter in to additional pretrial stipulations. In addition, if any witness listed above is unavailable, Defendants reserve the right to offer deposition and/or trial testimony from such witness. Defendants further reserve the right to call (i) any witness listed on Plaintiffs’ witness list, and (ii) additional witnesses not listed herein to offer testimony in rebuttal to evidence submitted by Plaintiffs. The listing of individuals on this Witness List does not waive any objection Defendants may have to the

testimony of such individuals that Plaintiffs may seek to introduce at trial, either live or by deposition and/or trial designation.

Dated: April 22, 2016

/s/R. Ryan Stoll

Patrick J. Fitzgerald

R. Ryan Stoll

Donna L. McDevitt

Andrew J. Fuchs

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Gary Gilmer

**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)  
Situating, )  
 )  
Plaintiff, ) CLASS ACTION  
 )  
vs. ) Honorable Jorge L. Alonso  
 )  
 )  
HOUSEHOLD INTERNATIONAL, INC., et )  
al., )  
 )  
Defendants. )  
 )

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' WITNESS LIST**

**[Exhibit D-4 to [Proposed] Final Pretrial Order]**

1. Plaintiffs object to the following witnesses listed on defendants' "will call" or "may call" lists:

(a) Edgar Ancona: Plaintiffs object to Mr. Ancona pursuant to Fed. R. Civ. P. 16, because defendants did not identify Mr. Ancona as a potential trial witness in the prior pre-trial Order (*see* Dkt. No. 1545-4, at 13-18 (Defendants' Witness List)), and have not identified good cause to amend the order to include Mr. Ancona. *See* Form LR 16.1.1 Final Pretrial Order Form, n.6 ("Any witness not listed will be precluded from testifying absent good cause shown, except that each party reserves the right to call such rebuttal witnesses (who are not presently identifiable) as may be necessary, without prior notice to the opposing party."). Plaintiffs also object to Mr. Ancona pursuant to FRE 401, 402 and 403 as his anticipated testimony does not relate to issues in the retrial.

(b) Bradford Cornell: Plaintiffs have filed a *Daubert* challenge to this witness' testimony. Dkt. No. 2128.

(c) Allen Ferrell: Plaintiffs have filed a *Daubert* challenge to this witness' testimony. Dkt. No. 2128.

(d) Christopher M. James: Plaintiffs have filed a *Daubert* challenge to this witness' testimony. Dkt. No. 2128.

Plaintiffs are also concurrently filing a motion *in limine* to exclude opinions offered by Drs. Cornell, Ferrell and James.

(e) James Glickenhause: Plaintiffs are concurrently filing a motion *in limine* to exclude Mr. Glickenhause' testimony in its entirety.

2. Plaintiffs object to defendants offering any expert testimony from any lay witnesses. *See* Plaintiffs' Motion *in Limine* No. 6.

3. Plaintiffs reserve the right to interpose additional objections to witnesses based upon the Court's pretrial rulings.

DATED: April 22, 2016

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Liaison Counsel



**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' STATEMENT OF QUALIFICATIONS  
OF EXPERT WITNESSES TO BE READ TO THE JURY**

**[Exhibit E-1 to [Proposed] Final Pretrial Order]**

Plaintiffs submit as Exhibit A below the summaries of qualifications of their experts to be read to the jury. Plaintiffs will proffer expert testimony from three retained experts, Catherine A. Ghiglieri, Harris L. Devor and Professor Daniel R. Fischel, as well as one non-retained expert, Charles Cross.

Ms. Ghiglieri is an industry expert retained by plaintiffs who will testify as to defendants' consumer lending business and practices as well as defendants' credit quality policies and practices. Ms. Ghiglieri's opinions on these topics are set forth in her two reports and were the subject of her deposition on February 13, 2008 and her trial testimony in 2009.

Mr. Devor is an accounting expert retained by plaintiffs who will testify regarding whether Household International Inc.'s consolidated financial statements and related disclosures complied with Generally Accepted Accounting Principles (GAAP). Mr. Devor's opinions on this topic, which includes opinions on specific accounting issues, are set forth in his expert report and were the subject of his deposition on February 20, 2008 and his trial testimony in 2009.

Professor Fischel is an economics expert retained by plaintiffs who will testify regarding loss causation and damages. Professor Fischel's opinions on these topics are set forth in his expert reports and were the subject of his depositions on March 21, 2008 and February 24, 2016 and his trial testimony in 2009.

Mr. Cross is an independent third party witness formerly employed by the Washington State Department of Financial Institutions (DFI). While at Washington State DFI, Mr. Cross developed opinions regarding defendants' consumer lending practices. Mr. Cross' opinions are memorialized in his testimony at his April 9, 2008 deposition in this case and the Washington State DFI reports, principally that report is dated April 30, 2002, which was marked as Exhibit 3 at his April 9, 2008 deposition in this case.

Plaintiffs propose that the Court read the following statement of these witnesses' expert qualifications.

DATED: April 22, 2016

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DANIEL S. DROSMAN (200643)  
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Liaison Counsel

## **EXHIBIT A**

### **Daniel R. Fischel**

1. Daniel R. Fischel is the President and Chairman of Compass Lexecon, a consulting firm specializing in the application of economics to a variety of legal and regulatory issues. He is also the Lee and Brena Freeman Professor of Law and Business Emeritus at The University of Chicago Law School. He previously served as the Dean of the University of Chicago Law School from 1999 to 2001, as the Director of that law school's Law and Economics Program from 1984 to 1991, and as Professor of Law and Business at The University of Chicago Graduate School of Business from 1987 to 1990, at the Kellogg School of Management at Northwestern University from 2006 to 2011, and at the Northwestern University Law School from 2006 to 2011. Earlier in his career, Professor Fischel served as a Law Clerk for United States Supreme Court Justice Potter Stewart.

2. Professor Fischel has published approximately fifty articles in leading legal and economics journals and coauthored the book *The Economic Structure of Corporate Law* with Judge Frank Easterbrook of the United States Court of Appeals for the Seventh Circuit in Chicago. Courts at all levels, including the United States Supreme Court, have cited Professor Fischel's work as authoritative.

3. Professor Fischel has served as a consultant or advisor on economic issues to many organizations and government agencies, including the United States Securities and Exchange Commission, the National Association of Securities Dealers, the New York Stock Exchange, the Chicago Board of Trade, the Chicago Board Options Exchange, the Chicago Mercantile Exchange, the New York Mercantile Exchange, the United States Department of Labor, the United States Department of Justice, the Federal Deposit Insurance Corporation, the Resolution Trust Corporation, the Federal Housing Finance Agency, and the Federal Trade Commission.

4. Professor Fischel has been recognized as an expert witness on economic issues, including damages in securities litigation, more than 100 times in federal and state court proceedings throughout the country. Defendants have described Professor Fischel as “if not the preeminent, one of the preeminent experts in this field” and as the expert who “wrote the book in this area literally.” The Court of Appeals for the Seventh Circuit described Professor Fischel as “one of the best in the field.”

5. Professor Fischel is a member of the American Economic Association, the American Finance Association, and the Board of Governors of the Becker Friedman Institute at The University of Chicago. He is also a former Advisor to the Corporate Governance Project at Harvard University, a former member of the Board of Directors of the Center for the Study of the Economy and the State at The University of Chicago, and former Chairman of the American Association of Law Schools’ Section on Law and Economics.

6. Professor Fischel received his Bachelor’s Degree from Cornell University with a major in American History and a minor in Economics, and he received a Master’s Degree in American History from Brown University. He graduated cum laude from The University of Chicago Law School.

**Catherine A. Ghiglieri**

1. Catherine A. Ghiglieri is the President of Ghiglieri & Company, a company that provides nationwide financial institution consulting services on a wide range of issues, including risk assessment, operational deficiencies, and regulatory enforcement actions. Ms. Ghiglieri also provides nationwide expert witness services in the financial services arena. From June 1992 through June 1999, Ms. Ghiglieri served as the Texas Banking Commissioner and as the Executive Director for the Texas Finance Commission. Prior to that, Ms. Ghiglieri spent 18 years with the Office of the Comptroller of the Currency, where she examined banks for loan quality issues and compliance with

federal laws and regulations. Ms. Ghiglieri has also taught classes on how to examine financial institutions for compliance issues and loan quality issues.

2. Ms. Ghiglieri has authored numerous articles relating to the financial industry, including articles respecting litigation risks faced by banks. Ms. Ghiglieri has authored numerous articles relating to the financial industry, including articles respecting litigation risks faced by banks. She is the co-author of *The Ultimate Guide for Bank Directors* (2010) and *The Ultimate Guide for Bank Directors, Revised Edition* (2015), which provides information for bank directors including loan and compliance issues.

3. Ms. Ghiglieri has been recognized as an expert witness with respect to compliance issues and loan quality issues in both federal and state courts throughout the country.

4. Ms. Ghiglieri received a Bachelor's Degree in Business Administration in Finance at the University of Notre Dame in 1974 and received a Juris Doctor from Georgia State University in 1991.

#### **Harris L. Devor**

1. Harris L. Devor has been a Certified Public Accountant for more than 40 years and for the last 25 years has been a founding shareholder of the accounting firm of Shechtman Marks Devor PC. Shechtman Marks Devor PC merged into, and became the Philadelphia Office of Friedman LLP effective January 1, 2016. The firm provides a wide range of accounting services, including financial accounting, auditing, forensic accounting and litigation services.

2. Mr. Devor has more than 40 years of experience planning, administering and supervising all phases of audits for large and small corporations, including extensive involvement with publicly-held corporations. Prior to joining Shechtman Marks Devor PC in 1990, he was an Audit Partner at the accounting firm of Laventhol & Horvath for six years and prior to that, from the time of earning his college degree in 1973, was a member of the Audit Group of Price Waterhouse for eight years, attaining the level of audit manager prior to his leaving that firm.

3. In addition to his extensive practical accounting and auditing experience, Mr. Devor has served as a consultant in litigation-related matters on accounting and auditing issues to numerous organizations and government agencies, including the United States Department of Justice, the United States Securities and Exchange Commission and several state attorneys general. He has been recognized as an expert witness on auditing as well as accounting and SEC disclosure issues numerous times in federal and state court proceedings throughout the country relating to some of the largest and noteworthy alleged financial frauds in the world over the last 20 years.

4. Mr. Devor is a member of the American Institute of Certified Public Accountants and the Pennsylvania Institute of Certified Public Accountants ("PICPA") where he has served on various committees including the PICPA Ethics Committee. He graduated from Temple University in 1973 with a Bachelor's Degree in Business Administration.

#### **Charles Cross**

1. Charles ("Chuck") Cross served in the Division of Consumer Services for Washington State Department of Financial Institutions for over ten years. The Consumer Services Division is responsible for regulating financial institutions, including Household Finance Corporation and Beneficial Finance Corporation, for compliance with state and federal consumer protection laws. In 1996, Mr. Cross became the Supervisor of Investigation/Enforcement in the Consumer Services Division and was promoted to the Enforcement Chief in May of 2002. In the course of his work at the Department of Financial Institutions, he has investigated and assisted in the prosecution of several financial institutions accused of engaging in predatory lending, including First Alliance Mortgage Company (FAMCO) and Ameriquest.

2. Prior to working at the Department of Financial Institutions, Mr. Cross was a federal bank examiner for the Federal Deposit Insurance Corporation (the FDIC) for 3 years.

3. On April 27, 2000, Mr. Cross prepared a memorandum for the Director of the Department of Financial Institutions regarding predatory lending and the Department of Financial

Institution's approach to regulating predatory lending. This memo was submitted by the Department of Financial Institutions as part of its official testimony to the Federal Reserve Board at a hearing held on September 7, 2000 in San Francisco, California.

4. Mr. Cross received a Bachelor's Degree in Accounting and Economics from Western Washington University.





Defendants assert the following objections to portions of Plaintiffs' proposed statement of expert witness qualifications to be ready to the jury:

<b><u>Plaintiffs' Proposed Statement</u></b>	<b><u>Defendants' Objection</u></b>
"Professor Fischel has published approximately fifty articles in leading legal and economics journals and coauthored the book The Economic Structure of Corporate Law with Judge Frank Easterbrook of the United States Court of Appeals for the Seventh Circuit in Chicago. Courts at all levels, including the United States Supreme Court, have cited Professor Fischel's work as authoritative."	Defendants object to the last sentence in this paragraph because the term "authoritative" is subjective, unfairly prejudicial under Rule 403, and incomplete in that it does not account for the Courts that have criticized and excluded Professor Fischel's opinions.
"Professor Fischel has been asked to testify as an expert witness on economic issues, including damages in securities litigation, more than 100 times in federal and state court proceedings throughout the country. Defendants have described Professor Fischel as 'if not the preeminent, one of the preeminent experts in this field' and as the expert who 'wrote the book in this area literally.' The Court of Appeals for the Seventh Circuit described Professor Fischel as 'one of the best in the field.'"	With respect to the first sentence, Defendants object to the phrase "asked to testify . . . more than 100 times in federal and state court proceedings throughout the country" because the number of occasions on which Professor Fischel has testified as an expert witness does not constitute a qualification to testify as an expert witness and is misleading and confusing under Rule 403. Defendants object to the second sentence for the reasons set forth in their motion in limine. Defendants object to the third sentence as not a proper qualification, unfairly prejudicial under Rule 403, and incomplete in that it does not account for the Courts that have criticized and excluded Professor Fischel's opinions.
"In addition to his extensive practical accounting and auditing experience, Mr. Devor has served as a consultant in litigation-related matters on accounting and auditing issues to numerous organizations and government agencies, including the United States Department of Justice, the United States Securities and Exchange Commission and several state attorneys general. He has been asked to testify as an expert on auditing as well as accounting and SEC disclosure issues numerous times in federal and state court proceedings throughout the country relating to some of the largest and noteworthy alleged financial frauds in the world over the last 20	Defendants object to the phrase in the first sentence "extensive practical accounting and auditing experience" as subjective. Defendants object to the characterization in the last sentence that Mr. Devor has been asked to testify in cases "relating to some of the largest and noteworthy alleged financial frauds in the world over the last 20 years" because "some of the largest and noteworthy alleged financial frauds in the world over the last 20 years" is a subjective and unsupported characterization that is also unfairly prejudicial under Rule 403.

years.	
The entirety of the proposed statement with respect to Mr. Cross.	Defendants object to this statement regarding Mr. Cross because Mr. Cross is not an expert witness as to the some or all of the testimony that Plaintiffs intend to offer. Although Judge Guzmán denied Defendants' <i>Daubert</i> motion with respect to Mr. Cross prior to the first trial, both parties and the Court recognized that some of Mr. Cross's testimony would be percipient rather than expert in nature. Plaintiffs have not identified the testimony for which they intend to offer Mr. Cross as a non-retained expert witness and if they do so in a timely manner, this statement should be appropriately qualified to indicate the dual and separate nature of his testimony.

Dated: April 22, 2016

Respectfully submitted,

/s/R. Ryan Stoll

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Gary Gilmer

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' STATEMENT OF QUALIFICATIONS  
OF EXPERT WITNESSES TO BE READ TO THE JURY**

**[Exhibit E-3 to [Proposed] Final Pretrial Order]**

Defendants submit the following summaries of the qualifications of their expert witnesses to be read to the jury.

**Dr. Allen Ferrell**

Dr. Allen Ferrell is an economist and a professor of securities law at Harvard Law School. Dr. Ferrell also teaches at Harvard's Kennedy School of Government and is a fellow at Columbia University's Program on the Law and Economics of Capital Markets. Dr. Ferrell has published approximately 30 articles in leading finance and law journals, including papers on securities damages, loss causation, and event study analysis.

Dr. Ferrell earned a Ph.D in economics from the Massachusetts Institute of Technology, or "MIT." In addition, Dr. Ferrell earned his law degree from Harvard Law School, and he served as a law clerk to United States Supreme Court Justice Anthony Kennedy.

Dr. Ferrell's experience in the fields of economics and law extends beyond his teaching. For example, Dr. Ferrell has been a member of the Board of Economic Advisors to the Financial Industry Regulatory Authority, or "FINRA." He has testified before the United States Senate Subcommittee on Securities, Insurance, and Investment, and has made presentations to the United States Securities and Exchange Commission, the World Bank, the International Monetary Fund, the Structured Products Association, and the National Bureau of Economic Research.

Dr. Ferrell has been recognized as an expert on economic issues in other cases, including securities cases in which he has provided expert testimony on the topics of loss causation and damages.

In this trial, Dr. Ferrell will offer an opinion about whether the Plaintiffs' expert, Professor Daniel Fischel, has demonstrated that one or more of the 17 misrepresentations caused

an economic loss to the Plaintiffs, and, if so, how much Household's stock price was artificially inflated by each of the 17 misrepresentations.

**Dr. Christopher James**

Dr. Christopher James is an economist and a professor of finance and economics at the University of Florida. Dr. James is a graduate of Michigan State University. He holds a Ph.D in economics and a Masters in business administration, both from the University of Michigan. He has taught courses in, among other subjects, finance and economics at the University of Michigan, the University of Oregon, and Cambridge University in England.

Dr. James's research spans many areas in banking and finance, including securities pricing, corporate finance, mortgage markets, bank lending, private equity investments, and financial institutions. He has published approximately 50 articles in leading finance and banking journals, including articles demonstrating that the effects of macroeconomic and regulatory events on financial institutions differ based on the institution's business focus.

In addition to his teaching, Dr. James has worked in various positions in the field of finance and financial institutions. He was a visiting scholar at the Federal Reserve Bank of San Francisco. He also served as a consultant to the Federal Deposit Insurance Corporation, or FDIC, and the United States Department of the Treasury Office of the Comptroller of the Currency. Dr. James has also served on the Board of Directors and the Advisory Board to the SunTrust Bank of Florida.

Dr. James has provided consulting services to a number of government agencies and corporations on issues concerning bank management, corporate finance, the valuation of corporate assets, and real estate-related issues.

Dr. James has been recognized as an expert in other cases, including providing expert testimony about the effect of macroeconomic and regulatory events on financial institutions.

In this trial, Dr. James will provide an expert opinion about the factors that would have impacted companies like Household, consumer finance institutions serving primarily nonconforming and subprime customers, during the relevant time period.

**Dr. Bradford Cornell**

Dr. Bradford Cornell has a Ph.D in financial economics from Stanford University, where he also earned a Master's degree in statistics. Today, Dr. Cornell is a visiting professor of financial economics at the California Institute of Technology. Before that, Dr. Cornell was a professor of finance for 26 years at the University of California at Los Angeles, or "UCLA," Anderson Graduate School of Management. He is the author of more than 100 academic articles, two books on finance and securities, and several articles published in the *Wall Street Journal* and the *Los Angeles Times*. In recognition of his research, Dr. Cornell has received numerous prizes and grants from institutions such as the Chicago Board of Trade, the Chicago Mercantile Exchange, the Institute for Quantitative Research in Finance, the Financial Management Association, and the Financial Analyst Society.

In addition to his teaching, research, and scholarship, Dr. Cornell has served in other positions in the field of finance and economics. He was a vice president of the Western Finance Association, a director of both the American Finance Association and the Western Finance Association, and an associate editor of various professional journals, including the *Journal of Finance*, the *Journal of Futures Markets*, the *Journal of Financial Research*, and the *Journal of International Business Studies*.



Dr. Cornell has also served as a consultant to, and has given expert testimony on behalf of, parties in a variety of securities, regulatory, and commercial lawsuits, including expert testimony relating to loss causation and damages in securities cases.

In this trial, Dr. Cornell will provide an expert opinion about whether Professor Fischel's leakage model is consistent with an academic article co-written by Dr. Cornell, upon which Professor Fischel relies, or is otherwise supported by academic literature or principles of financial economics.

Dated: April 22, 2016

Respectfully submitted,

/s/R. Ryan Stoll

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' OBJECTION TO DEFENDANTS' STATEMENT OF THE  
QUALIFICATIONS OF THEIR EXPERT WITNESSES TO BE READ TO THE JURY**

**[Exhibit E-4 to [Proposed] Final Pretrial Order]**

Plaintiffs object to the following statement in Defendants' Statement of the Qualifications of Their Expert Witnesses to be Read to the Jury:

In this trial, Dr. Ferrell will offer an opinion about whether the plaintiffs' expert, Professor Daniel Fischel, has demonstrated that one or more of the 17 misrepresentations caused an economic loss to the Plaintiffs, and, if so, how much Household's stock price was artificially inflated by each of the 17 misrepresentations.

Plaintiffs object to defendants' assertion that loss causation and damages must be determined on a statement-by-statement basis. *See* Plaintiffs' Motion *in Limine* No. 5, Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Object to Defendants' Proposed Verdict Form, Including Their "Question One" and Their Attempt to Add "Defendants' Specific Disclosures Model" as an Option for the Jury to Select in Determining Damages.

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' DEPOSITION DESIGNATIONS**  
**WITH DEFENDANTS' COMPLETENESS DESIGNATIONS**

**[Exhibit F-1 to [Proposed] Final Pretrial Order]**

Defendants' position is that none of the deposition testimony designated by Plaintiffs is within the proper scope of the re-trial. If any of these witnesses' testimony is not excluded, Defendants counter-designate the following additional testimony for completeness.

Plaintiffs object to the completeness designations in **bold** below because they are not necessary for fairness or completeness. The necessity and scope of completeness counter-designations with respect to the deposition testimony identified by plaintiffs was determined during several days of pre-trial hearings before the prior trial and ultimately was the subject of agreement between the parties. Based upon the Court's rulings and the parties' agreement, defendants' completeness designations set forth below are not necessary for completeness or fairness.

**Charles Cross**  
4/9/08

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
General	Defendants object to all of Plaintiffs' designations for Mr. Cross on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. In addition, Defendants assert the following specific objections to Plaintiffs' designations of Mr. Cross:	If Mr. Cross' testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness:	
General	Defendants object to Plaintiffs' designations for Mr. Cross to the extent that they are offered as expert testimony (FRE 702).		
12:14-13:4			
15:6-16			
16:12-19			

**Charles Cross**  
4/9/08

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
22:21-23:1			
26:19-22			
27:7-19			
28:12-22			
29:2-6	Hearsay (FRE 802)		
74:16-23	Hearsay (FRE 802)	<b>68:13-17</b>	Not FRE 106; FRE 402, 403
84:16-19			
84:21-85:8	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
97:25-98:11			
99:23-100:8	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
100:14-101:14		<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
105:8			
105:16-106:2	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
106:15-109:11	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
109:15-111:1	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
111:15-113:16	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>89:23-90:6</b>	Not FRE 106; FRE 402, 403
117:22-25			
118:4-17			
119:1-4			
119:7			
120:13-16			
120:23-121:4			
121:16-20			
121:23-122:1			
122:3-122:10			
122:12			



**Charles Cross**  
4/9/08

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
122:21-123:10	Hearsay (FRE 802)		
125:9-126:19	Hearsay (FRE 802)		
126:22-127:6			
127:16-127:23			
128:5-131:19	128:5-128:9, 131:11-131:19: Hearsay (FRE 802)	<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
132:23-133:11	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
133:25			
134:12-135:1			
135:4-140:10	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>36:6-24</b> <b>45:24-46:11</b> <b>68:13-17</b> <b>69:13-16</b>	LR 16.1, Not FRE 106; FRE 402, 403 LR 16.1, Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403
140:18-140:24	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
142:1-8	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
142:11-143:23	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
144:1-10	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
144:12-145:11	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>36:6-24</b> <b>45:24-46:11</b> <b>68:13-17</b> <b>69:13-16</b>	LR 16.1, Not FRE 106; FRE 402, 403 LR 16.1, Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403
145:21-146:2	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		

**Charles Cross**  
4/9/08

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
146:6-148:4	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>36:6-24</b>  <b>45:24-46:11</b>  <b>68:13-17</b> <b>69:13-16</b>	LR 16.1, Not FRE 106; FRE 402, 403  LR 16.1, Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403
150:4-9	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
150:11-12	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
150:22-151:24	Hearsay (FRE 802)		
152:6-8			
152:10			
152:12-13			
152:16-19			
152:21			
159:8-12			
159:18-21		<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
160:4-18			
160:24-161:13	Hearsay (FRE 802)		
161:18-162:13		<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
162:17-163:20	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
166:13-18	Hearsay (FRE 802)		
167:16-169:14	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>36:6-24</b>  <b>68:13-17</b> <b>69:13-16</b>	LR 16.1, Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403 Not FRE 106; FRE 402, 403
172:11			
172:14-173:1			
173:3-175:11	Offer of Compromise/Settlement (FRE 408)		

**Charles Cross**

4/9/08

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
175:25-176:7	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
176:10			
177:1-7	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
177:10-14			
178:24-179:2	Hearsay (FRE 802)		
179:4-179:7	Hearsay (FRE 802)		
179:9-179:11	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
179:14-16	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
179:19-181:13	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)	<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
181:19-185:2	Hearsay (FRE 802); Lack of personal knowledge (FRE 602); 1847-185:2: Irrelevant (FRE 402)	<b>45:24-46:11</b>	LR 16.1, Not FRE 106; FRE 402, 403
185:11-18			
185:22-24			
186:5-9			
189:11-12			
189:16-190:16		91:3-12	
193:4-196:9			
198:25-199:10	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
199:13-18			
200:3-5	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		
200:8	Hearsay (FRE 802); Lack of personal knowledge (FRE 602)		

**Hueman, Dennis**  
11/07/2006

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
General	Defendants object to all of Plaintiffs' designations for Mr. Hueman on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. In addition, Defendants assert the following specific objections to Plaintiffs' designations of Mr. Hueman:	If Mr. Hueman's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness:	
14:17-15:11			
19:6-15			
20:11-25			
21:5-7		21:14-17	
21:18-23		22:5-7	
25:6-16			
37:7-12		<b>38:3-4</b> <b>276:25-277:1</b> <b>277:10-12</b> <b>278:2-7</b>	LR 16.1, Not FRE 106; FRE 402, 403 Not FRE 106 Not FRE 106 Not FRE 106
38:5-6			
38:8-11		38:19-23 24:19-25:5	
39:21-40:7			
43:16-18			

**Hueman, Dennis**

11/07/2006

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
44:25-45:3		40:12 40:14-25 <b>41:3-19</b>  <b>42:11-43:2</b>  <b>44:4-9</b>  <b>280:16-17</b> <b>280:19-22</b>	LR 16.1, Not FRE 106; FRE 402, 403, 801, 802 LR 16.1, Not FRE 106; FRE 402, 403 LR 16.1, Not FRE 106; FRE 402, 403, 801, 802 Not FRE 106 Not FRE 106
46:19-24			
79:16-80:5			
80:7-8			

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
General	Defendants object to all of Plaintiffs' designations for Mr. May on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403). In addition, Defendants assert the following specific objections to Plaintiffs' designations of Mr. May:	If Mr. May's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness:	
10:11-14			
12:16-18	Improper foundation and Lack of personal knowledge (FRE 602)		
12:24-13:5		<b>18:12-19</b>	LR 16.1, Not FRE 106; FRE 401, 402, 403
13:16-17			
14:22-25			
20:22-21:5			
22:21-22		<b>21:6-13</b> <b>22:2-7</b>	LR 16.1, Not FRE 106 LR 16.1, Not FRE 106
22:25-23:2			
23:6-15			
23:18-24:16	Hearsay (FRE 802)	25:18-26:3	
24:19-25:7			
26:7-15			
27:1-7			
27:21-28:16			
29:16-30:10			

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
31:5-12	Unfairly prejudicial, misleading and confusing (FRE 403); Improper foundation and Lack of personal knowledge (FRE 602)		
32:8-21			
32:25-33:3			
35:14-36:13	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602)		
37:17-20			
40:6-7			
40:10-16	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Leading (FRE 611)		
40:19-25	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Leading (FRE 611)		
42:21-23			
43:6-8			
43:13-20			
44:4-45:1		<b>45:2-5</b> <b>46:2-11</b>	LR 16.1 FRE 401, 402, 403

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
46:13-19		<b>46:20-22</b>  <b>47:12-19</b>  <b>55:7-12</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106  LR 16.1; Not FRE 106; FRE 401, 402, 403
51:22-23			
51:10-19			
53:1-6			
53:10-21		<b>61:3-11</b>  <b>65:7-10</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  Not FRE 106; FRE 401, 402, 403
54:4-12		54:17-25	
56:15-57:13			
58:23-25			
59:2-14			
59:19-23			
60:1-6	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
60:9-13	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	60:19-22	



**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
61:17-62:11		<b>61:3-11</b>  <b>65:7-10</b>  66:10-14	LR 16.1; Not FRE 106; FRE 401, 402, 403  Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
69:5-15			
71:11-72:10			
123:19-22	123:23-124:5: Confusing and called for a legal conclusion (FRE 403); Improper foundation and Lack of personal knowledge (FRE 602)	<b>123:12-18</b>  <b>161:2-10</b>  <b>161:12</b>  <b>176:13-14</b>  <b>176:17-21</b>  <b>177:18-21</b>  <b>178:11-13</b>  <b>178:17-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
124:6-7	123:23-124:5: Confusing and called for a legal conclusion (FRE 403); Improper foundation and Lack of personal knowledge (FRE 602)	<b>123:12-18</b>  <b>161:2-10</b>  <b>161:12</b>  <b>176:13-14</b>  <b>176:17-21</b>  <b>177:18-21</b>  <b>178:11-13</b>  <b>178:17-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
144:1-20			

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
146:1-16		<b>108:12-20</b>  <b>209:12-13</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
147:6-12	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
147:14-22	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
148:4-20	147:11-14: Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>149:4-21</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403
149:3-3	149:4-10: Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>149:4-21</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
150:20-151:9	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
151:13-152:17	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>108:12-20</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403
152:19-24	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>153:8-11</b>  <b>153:17</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
153:2-2	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>153:8-11</b>  <b>153:17</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
163:2-2			
164:8-19	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
164:21-166:13	164:20: Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
166:15-20	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>108:12-20</b>  <b>209:12-13</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
166:23-168:1	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	<b>108:12-20</b>  <b>209:12-13</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403
168:16-20	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
168:24-169:1	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)		
172:22-24	Improper foundation and Lack of personal knowledge (FRE 602)	<b>46:20-22</b>  <b>47:12-19</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106
173:14-174:9	Improper foundation and Lack of personal knowledge (FRE 602)	<b>46:20-22</b>  <b>47:12-19</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106
177:9-11	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602)	<b>176:13-14</b>  <b>176:17-21</b>  <b>177:18-21</b>  <b>178:11-13</b>  <b>178:17-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403  LR 16.1; Not FRE 106; FRE 401, 402, 403

**May, Todd**  
5/1/2007

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
177:14-17	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602)	<b>176:13-14</b> <b>176:17-21</b> <b>177:18-21</b> <b>178:11-13</b> <b>178:17-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403
179:6-10		<b>55:7-12</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403
186:6-15			
188:18-189:4		<b>189:5-6</b> <b>189:9-13</b> <b>189:18-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403
189:14-17		<b>189:5-6</b> <b>189:9-13</b> <b>189:18-25</b>	LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403 LR 16.1; Not FRE 106; FRE 401, 402, 403
190:17-191:5	Improper foundation and Lack of personal knowledge (FRE 602)		
191:10-191:19	Hearsay (FRE 802); Improper foundation and Lack of personal knowledge (FRE 602)		
210:4-6			

**Walter, Lewellyn**  
3/15/06, 3/16/06

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
General	Defendants object to all of Plaintiffs' designations for Mr. Walter on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. In addition, Defendants assert the following specific objections to Plaintiffs' designations of Mr. Walter:	If Mr. Walter's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness:	
General		7:18-24	
General		9:11-19	
General		10:7-16	
General		<b>11:13-20</b>	LR 16.1, Not FRE 106; FRE 401, 402, 403
18:6-7		14:13-19 <b>18:8-19:5</b>	LR 16.1, Not FRE 106
19:6-12			
20:20-21:4			
22:2-11			
22:14-19			
25:21-26:8		<b>26:9-12</b>	LR 16.1, Not FRE 106
27:12-24			
28:8-10		28:13-14	
28:15-20			
28:23-29:1		<b>29:2-9</b>	LR 16.1, Not FRE 106; FRE 401, 402, 403
30:11-12		30:16-19	
30:20-31:17			
33:18-34:2			
35:4-14		35:15-17	
35:18-37:8			

**Walter, Lewellyn**  
3/15/06, 3/16/06

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
38:1-6			
38:11-24			
40:9-11			
40:14-41:4		41:5-8	
41:15-25			
42:24-43:5		42:14-23 <b>46:20-22</b>  <b>50:3-13</b>  <b>51:2-12</b>  <b>52:8-19</b>  <b>53:18-54:2</b>  <b>55:1-56:2</b>	LR 16.1, Not FRE 106; FRE 401, 402, 403 Not FRE 106; FRE 401, 402, 403 Not FRE 106; FRE 401, 402, 403 Not FRE 106; FRE 401, 402, 403 LR 16.1, Not FRE 106; FRE 401, 402, 403 LR 16.1, Not FRE 106; FRE 401, 402, 403, 602
58:10-17			
59:2-8			
59:24-60:10			
68:23-69:6		70:5-7 70:10-13	
72:11-21		72:22-73:4	
78:6-10			
78:13-15		78:16 78:18-79:3	
95:1-10		95:20-21	
95:22-96:20			
96:23-25			
97:3-15		97:20-23	
97:24-98:2			
98:10-98:18			
98:22-99:12			
99:14-15			
99:22-23			
100:1-15		97:20-23	



**Walter, Lewellyn**  
 3/15/06, 3/16/06

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections to Plaintiffs' Designations</b>	<b>Defendants' Completeness Designations</b>	<b>Plaintiffs' Objections to Defendants' Completeness Designations</b>
101:4-8		<b>101:9</b>	
102:5-6			
102:17-103:2		101:19-102:4	
103:12-15			
103:18-20			
104:12-17		104:18-21	
106:24-107:7			
107:11-19			
107:22-23			
109:1-3			
111:16-112:5			
112:24-113:12			
114:6-17			
115:20-116:4			
138:23-139:1			
139:9-13		139:22-23	
138:17-21			
140:8-13			
140:15			
141:4-8			
141:12-14			
147:6-11			
148:5-11			
148:13-14			
149:7-9			
149:11-13			
149:16-17			
150:2-3			
150:5-17			
150:19			
151:2-5			
157:3-15		157:25-158:3	

DATED: April 22, 2016

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Liaison Counsel

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' TRIAL DESIGNATIONS**

**[Exhibit F-2 to [Proposed] Final Pretrial Order]**

Below are designations for testimony given at the prior trial of this matter for use at this trial:

**I. MUKESH BAJAJ**

**Defendants' objections:** Defendants object to all of Plaintiffs' designations for Dr. Bajaj on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, and unfair prejudice (FRE 403) because Dr. Bajaj is not a testifying expert witness on behalf of Defendants, and because he has not been retained as an expert for either party and has no "personal knowledge" to offer as a fact witness (FRE 602). If Dr. Bajaj's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness.

<b>Plaintiffs' Designations</b>	<b>Defendants' Objections</b>	<b>Defendants' Completeness</b>	<b>Plaintiffs' Objections</b>
4077:16-4078:15			
4080:4-7			
4090:13-16			
4091:23-4092:2			
4112:21-4113:18			
4244:2-6			
4245:4-7			
4248:14-4249:19			
4267:12-4268:13			
		4078:19-24	
		4079:4-23	
		4092:3-10	Not FRE 106: cumulative to other defense experts
		4147:10-4150:24	Not FRE 106: cumulative to other defense experts
		4151:6-13	Not FRE 106: cumulative to other defense experts

**II. STEPHEN HICKS**

**Defendants' objections:** Defendants object to all of Plaintiffs' designations for Mr. Hicks on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. If Mr. Hicks' testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness.

Plaintiffs' Designations	Defendants' Objections	Defendants' Completeness	Plaintiffs' Objections
1668:5-1670:4			
1670:10-1671:11			
1671:14-1673:4 (ending with "Correct.")		1673:4-11	Not FRE 106
1673:12-19 (ending with "like more exam items.")		1673:4-11	Not FRE 106
1674:8-25 (ending with "It is")		1674:25	Testimony stricken as non-responsive; FRE 401, 402, 403
1675:4-5 (ending with "It was.")		1675:4-8	Testimony stricken as non-responsive; FRE 401, 402, 403
1676:17-25 (starting with "You don't know")			
1677:3-16			
1677:18-1682:2			
1682:5-1685:19			
1685:22-1686:20			
1686:22-1692:9			
		1692:13-1694:10	Not FRE 106; plaintiffs' counter designate 1694:14-1695:4; 1695:13-14.

### III. HELEN ELAINE MARKELL

**Defendants' objections:** Defendants object to all of Plaintiffs' designations for Ms. Markell on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. If Ms. Markell's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness.

Plaintiffs' Designations	Defendants' Objections	Defendants' Completeness	Plaintiffs' Objections
2223:7-8			
2223:11-2229:20			
2229:23-2230:2			
2230:4-2234:14			
2234:17-22			

Plaintiffs' Designations	Defendants' Objections	Defendants' Completeness	Plaintiffs' Objections
2234:24-2239:12 (ending with "probably with Mr. Gibson.")			
2239:21-2240:23			
2241:1-9			
2241:11-2243:9			
2243:12-2245:16			
2245:19-25			
2246:2-2248:17			
2248:20-2249:2			
2249:4-2252:22			
2252:25-2253:8			
2253:10-2258:7			
2258:10-2262:22			
2314:15-24			
		2263:13 – 2271:19	
		2275:12 – 2276:25	
		2278:9 – 2279:15	
		2284:11 – 2287:10	
		2288:14 – 2289:23	
		2292:15 – 2293:21	
		2299:14 – 2300:2	
		2301:17 – 2304:12	
		2309:12 - 2310:4	
		2312:1 - 2313:19	

#### IV. ROBERT O'HAN

**Defendants' objections:** Defendants object to all of Plaintiffs' designations for Mr. O'Han on the grounds of relevance (FRE 402) and confusion of the issues, waste of time, and unfair prejudice (FRE 403) because the testimony does not relate to issues in the retrial. If Mr. O'Han's testimony is not excluded in its entirety, Defendants counter-designate the following additional testimony for completeness.

Plaintiffs' Designations	Defendants' Objections	Plaintiffs' Responses to Defendants' Objections	Defendants' Completeness	Plaintiffs' Objections
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<b>Plaintiffs' Designations</b>	<b>Defendants' Objections</b>	<b>Plaintiffs' Responses to Defendants' Objections</b>	<b>Defendants' Completeness</b>	<b>Plaintiffs' Objections</b>
2809:23-2815:9	2813:16-2814:1, 2814:13-14: Improper foundation and Lack of personal knowledge (FRE 602); Improper testimony by counsel (FRE 403)	Waiver, FRE 601, 602, 611		
2815:19-2816:1				
2816:4-2817:9				
2817:21-2819:16	2817:21-23: Improper foundation and Lack of personal knowledge (FRE 602)	Waiver, FRE 601, 602		
2819:22-2820:25				
2821:4-2821:18				
2822:4:2830:22	2822:4-14: Improper foundation and Lack of personal knowledge (FRE 602)	Waiver, FRE 601, 602		
			2831:15-17	
			2831:24-2832:18	
			2832:24-2834:4	2833:18-2834:4: Not FRE 106; FRE 401, 402, 403
			2834:11-2836:21	2834:11-2836:5: Not FRE 106; FRE 401, 402, 403
			2837:2-10	

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' ITEMIZED STATEMENT OF DAMAGES**

**[Exhibit G to [Proposed] Final Pretrial Order]**

Lead plaintiffs will ask the jury to determine the artificial inflation present in Household International, Inc.'s ("Household") common stock on a per share basis for each day of the Class Period. Plaintiffs will present damages based on two methodologies employed by their expert, Professor Daniel R. Fischel. Exhibit 25 to Professor Fischel's Second Supplemental Report (Trial Ex. 2021) (attached hereto as Exhibit 1) identifies the estimated daily per share artificial inflation for his Leakage and Specific Disclosure models.

DATED: April 22, 2016

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# EXHIBIT 1

P2021

# Household International, Inc. Common Stock

## Estimates of Alleged Artificial Inflation

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
03/23/01	\$58.12	\$55.06	\$3.06	At Most \$55.06	At Least \$3.06
03/26/01	\$57.94	\$54.88	\$3.06	At Most \$54.88	At Least \$3.06
03/27/01	\$59.85	\$56.79	\$3.06	At Most \$56.79	At Least \$3.06
03/28/01	\$59.35	\$51.38	\$7.97	\$35.41	\$23.94
03/29/01	\$58.15	\$50.18	\$7.97	\$34.21	\$23.94
03/30/01	\$59.24	\$51.27	\$7.97	\$35.30	\$23.94
04/02/01	\$59.50	\$51.53	\$7.97	\$35.56	\$23.94
04/03/01	\$58.92	\$50.95	\$7.97	\$34.98	\$23.94
04/04/01	\$58.45	\$50.48	\$7.97	\$34.51	\$23.94
04/05/01	\$59.73	\$51.76	\$7.97	\$35.79	\$23.94
04/06/01	\$58.54	\$50.57	\$7.97	\$34.60	\$23.94
04/09/01	\$59.45	\$51.48	\$7.97	\$35.51	\$23.94
04/10/01	\$61.12	\$53.15	\$7.97	\$37.18	\$23.94
04/11/01	\$60.54	\$52.57	\$7.97	\$36.60	\$23.94
04/12/01	\$61.40	\$53.43	\$7.97	\$37.46	\$23.94
04/16/01	\$60.33	\$52.36	\$7.97	\$36.39	\$23.94
04/17/01	\$60.91	\$52.94	\$7.97	\$36.97	\$23.94
04/18/01	\$63.38	\$55.41	\$7.97	\$39.44	\$23.94
04/19/01	\$63.05	\$55.08	\$7.97	\$39.11	\$23.94
04/20/01	\$62.45	\$54.48	\$7.97	\$38.51	\$23.94
04/23/01	\$62.23	\$54.26	\$7.97	\$38.29	\$23.94
04/24/01	\$63.10	\$55.13	\$7.97	\$39.16	\$23.94
04/25/01	\$64.75	\$56.78	\$7.97	\$40.81	\$23.94
04/26/01	\$63.40	\$55.43	\$7.97	\$39.46	\$23.94
04/27/01	\$64.38	\$56.41	\$7.97	\$40.44	\$23.94
04/30/01	\$64.02	\$56.05	\$7.97	\$40.08	\$23.94
05/01/01	\$64.46	\$56.49	\$7.97	\$40.52	\$23.94
05/02/01	\$65.46	\$57.49	\$7.97	\$41.52	\$23.94
05/03/01	\$65.29	\$57.32	\$7.97	\$41.35	\$23.94
05/04/01	\$65.70	\$57.73	\$7.97	\$41.76	\$23.94
05/07/01	\$65.50	\$57.53	\$7.97	\$41.56	\$23.94
05/08/01	\$65.42	\$57.45	\$7.97	\$41.48	\$23.94
05/09/01	\$66.05	\$58.08	\$7.97	\$42.11	\$23.94
05/10/01	\$65.08	\$57.11	\$7.97	\$41.14	\$23.94
05/11/01	\$64.91	\$56.94	\$7.97	\$40.97	\$23.94
05/14/01	\$65.22	\$57.25	\$7.97	\$41.28	\$23.94
05/15/01	\$66.94	\$58.97	\$7.97	\$43.00	\$23.94
05/16/01	\$68.64	\$60.67	\$7.97	\$44.70	\$23.94
05/17/01	\$68.20	\$60.23	\$7.97	\$44.26	\$23.94
05/18/01	\$67.57	\$59.60	\$7.97	\$43.63	\$23.94
05/21/01	\$67.67	\$59.70	\$7.97	\$43.73	\$23.94
05/22/01	\$67.71	\$59.74	\$7.97	\$43.77	\$23.94
05/23/01	\$66.48	\$58.51	\$7.97	\$42.54	\$23.94
05/24/01	\$66.44	\$58.47	\$7.97	\$42.50	\$23.94
05/25/01	\$66.27	\$58.30	\$7.97	\$42.33	\$23.94
05/29/01	\$66.00	\$58.03	\$7.97	\$42.06	\$23.94

**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
05/30/01	\$65.80	\$57.83	\$7.97	\$41.86	\$23.94
05/31/01	\$65.66	\$57.69	\$7.97	\$41.72	\$23.94
06/01/01	\$65.74	\$57.77	\$7.97	\$41.80	\$23.94
06/04/01	\$66.43	\$58.46	\$7.97	\$42.49	\$23.94
06/05/01	\$66.98	\$59.01	\$7.97	\$43.04	\$23.94
06/06/01	\$65.96	\$57.99	\$7.97	\$42.02	\$23.94
06/07/01	\$65.82	\$57.85	\$7.97	\$41.88	\$23.94
06/08/01	\$65.80	\$57.83	\$7.97	\$41.86	\$23.94
06/11/01	\$65.78	\$57.81	\$7.97	\$41.84	\$23.94
06/12/01	\$65.30	\$57.33	\$7.97	\$41.36	\$23.94
06/13/01	\$65.25	\$57.28	\$7.97	\$41.31	\$23.94
06/14/01	\$64.71	\$56.74	\$7.97	\$40.77	\$23.94
06/15/01	\$63.80	\$55.83	\$7.97	\$39.86	\$23.94
06/18/01	\$63.65	\$55.68	\$7.97	\$39.71	\$23.94
06/19/01	\$63.82	\$55.85	\$7.97	\$39.88	\$23.94
06/20/01	\$64.61	\$56.64	\$7.97	\$40.67	\$23.94
06/21/01	\$66.71	\$58.74	\$7.97	\$42.77	\$23.94
06/22/01	\$67.01	\$59.04	\$7.97	\$43.07	\$23.94
06/25/01	\$65.95	\$57.98	\$7.97	\$42.01	\$23.94
06/26/01	\$65.14	\$57.17	\$7.97	\$41.20	\$23.94
06/27/01	\$65.70	\$57.73	\$7.97	\$41.76	\$23.94
06/28/01	\$65.98	\$58.01	\$7.97	\$42.04	\$23.94
06/29/01	\$66.70	\$58.73	\$7.97	\$42.76	\$23.94
07/02/01	\$66.60	\$58.63	\$7.97	\$42.66	\$23.94
07/03/01	\$66.23	\$58.26	\$7.97	\$42.29	\$23.94
07/05/01	\$66.95	\$58.98	\$7.97	\$43.01	\$23.94
07/06/01	\$66.54	\$58.57	\$7.97	\$42.60	\$23.94
07/09/01	\$66.48	\$58.51	\$7.97	\$42.54	\$23.94
07/10/01	\$65.55	\$57.58	\$7.97	\$41.61	\$23.94
07/11/01	\$65.24	\$57.27	\$7.97	\$41.30	\$23.94
07/12/01	\$66.40	\$58.43	\$7.97	\$42.46	\$23.94
07/13/01	\$67.16	\$59.19	\$7.97	\$43.22	\$23.94
07/16/01	\$68.11	\$60.14	\$7.97	\$44.17	\$23.94
07/17/01	\$68.95	\$60.98	\$7.97	\$45.01	\$23.94
07/18/01	\$69.48	\$61.51	\$7.97	\$45.54	\$23.94
07/19/01	\$66.50	\$58.53	\$7.97	\$42.56	\$23.94
07/20/01	\$67.28	\$59.31	\$7.97	\$43.34	\$23.94
07/23/01	\$67.50	\$59.53	\$7.97	\$43.56	\$23.94
07/24/01	\$67.01	\$59.04	\$7.97	\$43.07	\$23.94
07/25/01	\$66.76	\$58.79	\$7.97	\$42.82	\$23.94
07/26/01	\$65.38	\$57.41	\$7.97	\$41.44	\$23.94
07/27/01	\$66.18	\$58.21	\$7.97	\$42.24	\$23.94
07/30/01	\$66.09	\$58.12	\$7.97	\$42.15	\$23.94
07/31/01	\$66.29	\$58.32	\$7.97	\$42.35	\$23.94
08/01/01	\$65.75	\$57.78	\$7.97	\$41.81	\$23.94
08/02/01	\$66.00	\$58.03	\$7.97	\$42.06	\$23.94



**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
08/03/01	\$65.99	\$58.02	\$7.97	\$42.05	\$23.94
08/06/01	\$65.71	\$57.74	\$7.97	\$41.77	\$23.94
08/07/01	\$66.44	\$58.47	\$7.97	\$42.50	\$23.94
08/08/01	\$65.86	\$57.89	\$7.97	\$41.92	\$23.94
08/09/01	\$66.24	\$58.27	\$7.97	\$42.30	\$23.94
08/10/01	\$67.13	\$59.16	\$7.97	\$43.19	\$23.94
08/13/01	\$68.01	\$60.04	\$7.97	\$44.07	\$23.94
08/14/01	\$68.00	\$60.03	\$7.97	\$44.06	\$23.94
08/15/01	\$67.95	\$59.98	\$7.97	\$44.01	\$23.94
08/16/01	\$66.87	\$58.90	\$7.97	\$42.93	\$23.94
08/17/01	\$65.99	\$58.02	\$7.97	\$42.05	\$23.94
08/20/01	\$65.50	\$57.53	\$7.97	\$41.56	\$23.94
08/21/01	\$64.86	\$56.89	\$7.97	\$40.92	\$23.94
08/22/01	\$65.48	\$57.51	\$7.97	\$41.54	\$23.94
08/23/01	\$64.72	\$56.75	\$7.97	\$40.78	\$23.94
08/24/01	\$62.35	\$54.38	\$7.97	\$38.41	\$23.94
08/27/01	\$61.96	\$53.99	\$7.97	\$38.02	\$23.94
08/28/01	\$61.34	\$53.37	\$7.97	\$37.40	\$23.94
08/29/01	\$60.70	\$52.73	\$7.97	\$36.76	\$23.94
08/30/01	\$59.31	\$51.34	\$7.97	\$35.37	\$23.94
08/31/01	\$59.10	\$51.13	\$7.97	\$35.16	\$23.94
09/04/01	\$57.06	\$49.09	\$7.97	\$33.12	\$23.94
09/05/01	\$57.22	\$49.25	\$7.97	\$33.28	\$23.94
09/06/01	\$57.00	\$49.03	\$7.97	\$33.06	\$23.94
09/07/01	\$55.04	\$47.07	\$7.97	\$31.48	\$23.56
09/10/01	\$56.31	\$48.34	\$7.97	\$32.37	\$23.94
09/17/01	\$52.83	\$44.86	\$7.97	\$30.22	\$22.61
09/18/01	\$52.64	\$44.67	\$7.97	\$30.11	\$22.53
09/19/01	\$52.30	\$44.33	\$7.97	\$29.92	\$22.38
09/20/01	\$51.46	\$43.49	\$7.97	\$29.44	\$22.02
09/21/01	\$50.34	\$42.37	\$7.97	\$28.80	\$21.54
09/24/01	\$52.85	\$44.88	\$7.97	\$30.23	\$22.62
09/25/01	\$52.08	\$44.11	\$7.97	\$29.79	\$22.29
09/26/01	\$53.60	\$45.63	\$7.97	\$30.57	\$23.03
09/27/01	\$54.49	\$46.52	\$7.97	\$31.07	\$23.42
09/28/01	\$56.38	\$48.41	\$7.97	\$32.44	\$23.94
10/01/01	\$57.50	\$49.53	\$7.97	\$33.56	\$23.94
10/02/01	\$57.83	\$49.86	\$7.97	\$33.89	\$23.94
10/03/01	\$58.20	\$50.23	\$7.97	\$34.26	\$23.94
10/04/01	\$59.63	\$51.66	\$7.97	\$35.69	\$23.94
10/05/01	\$58.35	\$50.38	\$7.97	\$34.41	\$23.94
10/08/01	\$56.50	\$48.53	\$7.97	\$32.56	\$23.94
10/09/01	\$56.59	\$48.62	\$7.97	\$32.65	\$23.94
10/10/01	\$58.22	\$50.25	\$7.97	\$34.28	\$23.94
10/11/01	\$56.95	\$48.98	\$7.97	\$33.01	\$23.94
10/12/01	\$54.89	\$46.92	\$7.97	\$31.30	\$23.59

**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
10/15/01	\$55.91	\$47.94	\$7.97	\$31.97	\$23.94
10/16/01	\$56.00	\$48.03	\$7.97	\$32.06	\$23.94
10/17/01	\$57.16	\$49.19	\$7.97	\$33.22	\$23.94
10/18/01	\$57.53	\$49.56	\$7.97	\$33.59	\$23.94
10/19/01	\$56.91	\$48.94	\$7.97	\$32.97	\$23.94
10/22/01	\$56.92	\$48.95	\$7.97	\$32.98	\$23.94
10/23/01	\$57.25	\$49.28	\$7.97	\$33.31	\$23.94
10/24/01	\$55.44	\$47.47	\$7.97	\$31.61	\$23.83
10/25/01	\$57.19	\$49.22	\$7.97	\$33.25	\$23.94
10/26/01	\$57.48	\$49.51	\$7.97	\$33.54	\$23.94
10/29/01	\$54.49	\$46.52	\$7.97	\$31.07	\$23.42
10/30/01	\$53.52	\$45.55	\$7.97	\$30.52	\$23.00
10/31/01	\$52.30	\$44.33	\$7.97	\$29.82	\$22.48
11/01/01	\$52.90	\$44.93	\$7.97	\$30.17	\$22.73
11/02/01	\$52.76	\$44.79	\$7.97	\$30.09	\$22.67
11/05/01	\$53.75	\$45.78	\$7.97	\$30.65	\$23.10
11/06/01	\$56.53	\$48.56	\$7.97	\$32.59	\$23.94
11/07/01	\$58.72	\$50.75	\$7.97	\$34.78	\$23.94
11/08/01	\$57.79	\$49.82	\$7.97	\$33.85	\$23.94
11/09/01	\$57.98	\$50.01	\$7.97	\$34.04	\$23.94
11/12/01	\$58.21	\$50.24	\$7.97	\$34.27	\$23.94
11/13/01	\$60.00	\$52.03	\$7.97	\$36.06	\$23.94
11/14/01	\$60.90	\$52.93	\$7.97	\$36.96	\$23.94
11/15/01	\$58.90	\$52.79	\$6.11	\$34.96	\$23.94
11/16/01	\$57.80	\$51.69	\$6.11	\$34.20	\$23.60
11/19/01	\$58.75	\$52.64	\$6.11	\$34.81	\$23.94
11/20/01	\$58.37	\$52.26	\$6.11	\$34.52	\$23.85
11/21/01	\$58.56	\$52.45	\$6.11	\$34.62	\$23.94
11/23/01	\$59.62	\$53.51	\$6.11	\$35.68	\$23.94
11/26/01	\$60.18	\$54.07	\$6.11	\$36.24	\$23.94
11/27/01	\$60.76	\$54.65	\$6.11	\$36.82	\$23.94
11/28/01	\$60.34	\$54.23	\$6.11	\$36.40	\$23.94
11/29/01	\$59.80	\$53.69	\$6.11	\$35.86	\$23.94
11/30/01	\$58.99	\$52.88	\$6.11	\$35.05	\$23.94
12/03/01	\$56.29	\$52.09	\$4.20	\$33.70	\$22.59
12/04/01	\$58.23	\$54.03	\$4.20	\$34.29	\$23.94
12/05/01	\$61.00	\$54.95	\$6.05	\$37.06	\$23.94
12/06/01	\$60.66	\$54.61	\$6.05	\$36.72	\$23.94
12/07/01	\$59.66	\$53.61	\$6.05	\$35.72	\$23.94
12/10/01	\$57.60	\$51.55	\$6.05	\$34.30	\$23.30
12/11/01	\$56.66	\$50.61	\$6.05	\$34.46	\$22.20
12/12/01	\$54.15	\$50.49	\$3.66	\$34.35	\$19.80
12/13/01	\$54.23	\$50.57	\$3.66	\$33.94	\$20.29
12/14/01	\$53.35	\$49.69	\$3.66	\$33.71	\$19.64
12/17/01	\$54.57	\$50.91	\$3.66	\$33.96	\$20.61
12/18/01	\$56.12	\$52.46	\$3.66	\$34.28	\$21.84

**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
12/19/01	\$56.87	\$53.21	\$3.66	\$34.83	\$22.04
12/20/01	\$56.50	\$52.84	\$3.66	\$34.75	\$21.75
12/21/01	\$55.90	\$52.24	\$3.66	\$34.53	\$21.37
12/24/01	\$56.09	\$52.43	\$3.66	\$34.49	\$21.60
12/26/01	\$56.38	\$52.72	\$3.66	\$34.56	\$21.82
12/27/01	\$57.83	\$54.17	\$3.66	\$34.53	\$23.30
12/28/01	\$58.88	\$55.22	\$3.66	\$34.94	\$23.94
12/31/01	\$57.94	\$54.28	\$3.66	\$34.66	\$23.28
01/02/02	\$57.09	\$53.43	\$3.66	\$34.51	\$22.58
01/03/02	\$57.05	\$53.39	\$3.66	\$34.64	\$22.41
01/04/02	\$59.19	\$55.53	\$3.66	\$35.25	\$23.94
01/07/02	\$58.10	\$54.44	\$3.66	\$34.91	\$23.19
01/08/02	\$56.74	\$53.08	\$3.66	\$34.45	\$22.29
01/09/02	\$57.10	\$53.44	\$3.66	\$34.68	\$22.42
01/10/02	\$56.54	\$52.88	\$3.66	\$34.84	\$21.70
01/11/02	\$54.38	\$50.72	\$3.66	\$34.53	\$19.85
01/14/02	\$52.78	\$49.12	\$3.66	\$34.25	\$18.53
01/15/02	\$55.20	\$51.54	\$3.66	\$34.92	\$20.28
01/16/02	\$54.45	\$50.79	\$3.66	\$34.58	\$19.87
01/17/02	\$53.76	\$50.10	\$3.66	\$34.86	\$18.90
01/18/02	\$54.85	\$51.19	\$3.66	\$34.82	\$20.03
01/22/02	\$54.05	\$50.39	\$3.66	\$34.81	\$19.24
01/23/02	\$53.35	\$49.69	\$3.66	\$34.76	\$18.59
01/24/02	\$53.75	\$50.09	\$3.66	\$34.89	\$18.86
01/25/02	\$54.71	\$51.05	\$3.66	\$35.01	\$19.70
01/28/02	\$52.85	\$49.19	\$3.66	\$34.75	\$18.10
01/29/02	\$49.85	\$46.19	\$3.66	\$33.27	\$16.58
01/30/02	\$49.35	\$45.69	\$3.66	\$33.59	\$15.76
01/31/02	\$51.24	\$47.58	\$3.66	\$34.12	\$17.12
02/01/02	\$51.10	\$47.44	\$3.66	\$33.76	\$17.34
02/04/02	\$48.80	\$45.14	\$3.66	\$32.74	\$16.06
02/05/02	\$47.53	\$43.87	\$3.66	\$32.54	\$14.99
02/06/02	\$44.71	\$41.05	\$3.66	\$32.24	\$12.47
02/07/02	\$48.01	\$44.35	\$3.66	\$32.45	\$15.56
02/08/02	\$52.00	\$48.34	\$3.66	\$33.29	\$18.71
02/11/02	\$51.45	\$47.79	\$3.66	\$33.51	\$17.94
02/12/02	\$50.80	\$47.14	\$3.66	\$33.31	\$17.49
02/13/02	\$52.15	\$48.49	\$3.66	\$33.79	\$18.36
02/14/02	\$51.92	\$48.26	\$3.66	\$33.88	\$18.04
02/15/02	\$50.89	\$47.23	\$3.66	\$32.89	\$18.00
02/19/02	\$50.35	\$46.69	\$3.66	\$32.51	\$17.84
02/20/02	\$50.65	\$46.99	\$3.66	\$32.93	\$17.72
02/21/02	\$48.50	\$44.84	\$3.66	\$32.50	\$16.00
02/22/02	\$48.65	\$44.99	\$3.66	\$32.41	\$16.24
02/25/02	\$49.58	\$45.92	\$3.66	\$33.13	\$16.45
02/26/02	\$49.98	\$46.32	\$3.66	\$33.26	\$16.72



**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
02/27/02	\$52.08	\$46.78	\$5.30	\$33.53	\$18.55
02/28/02	\$51.50	\$46.20	\$5.30	\$33.69	\$17.81
03/01/02	\$53.00	\$47.70	\$5.30	\$33.98	\$19.02
03/04/02	\$57.25	\$51.95	\$5.30	\$35.04	\$22.21
03/05/02	\$56.28	\$50.98	\$5.30	\$35.11	\$21.17
03/06/02	\$57.77	\$52.47	\$5.30	\$35.60	\$22.17
03/07/02	\$58.36	\$53.06	\$5.30	\$35.36	\$23.00
03/08/02	\$59.90	\$54.60	\$5.30	\$35.96	\$23.94
03/11/02	\$59.73	\$54.43	\$5.30	\$35.79	\$23.94
03/12/02	\$59.16	\$53.86	\$5.30	\$35.79	\$23.37
03/13/02	\$58.40	\$53.10	\$5.30	\$35.54	\$22.86
03/14/02	\$57.48	\$52.18	\$5.30	\$35.61	\$21.87
03/15/02	\$58.95	\$53.65	\$5.30	\$36.26	\$22.69
03/18/02	\$58.98	\$53.68	\$5.30	\$36.05	\$22.93
03/19/02	\$58.98	\$53.68	\$5.30	\$36.21	\$22.77
03/20/02	\$57.61	\$52.31	\$5.30	\$35.68	\$21.93
03/21/02	\$57.90	\$52.60	\$5.30	\$35.67	\$22.23
03/22/02	\$58.14	\$52.84	\$5.30	\$35.75	\$22.39
03/25/02	\$56.30	\$51.00	\$5.30	\$35.24	\$21.06
03/26/02	\$57.00	\$51.70	\$5.30	\$35.34	\$21.66
03/27/02	\$57.50	\$52.20	\$5.30	\$35.70	\$21.80
03/28/02	\$56.80	\$51.50	\$5.30	\$35.55	\$21.25
04/01/02	\$57.03	\$51.73	\$5.30	\$35.35	\$21.68
04/02/02	\$57.05	\$51.75	\$5.30	\$35.53	\$21.52
04/03/02	\$55.75	\$50.45	\$5.30	\$35.22	\$20.53
04/04/02	\$56.83	\$51.53	\$5.30	\$35.44	\$21.39
04/05/02	\$57.98	\$52.68	\$5.30	\$35.70	\$22.28
04/08/02	\$59.06	\$53.76	\$5.30	\$35.82	\$23.24
04/09/02	\$59.25	\$53.95	\$5.30	\$36.09	\$23.16
04/10/02	\$59.35	\$54.05	\$5.30	\$36.12	\$23.23
04/11/02	\$57.05	\$51.75	\$5.30	\$35.32	\$21.73
04/12/02	\$58.10	\$52.80	\$5.30	\$35.70	\$22.40
04/15/02	\$57.48	\$52.18	\$5.30	\$35.24	\$22.24
04/16/02	\$59.52	\$54.22	\$5.30	\$35.87	\$23.65
04/17/02	\$60.70	\$55.40	\$5.30	\$36.76	\$23.94
04/18/02	\$61.20	\$55.90	\$5.30	\$37.26	\$23.94
04/19/02	\$62.44	\$57.14	\$5.30	\$38.50	\$23.94
04/22/02	\$60.90	\$55.60	\$5.30	\$36.96	\$23.94
04/23/02	\$61.80	\$56.50	\$5.30	\$37.86	\$23.94
04/24/02	\$61.36	\$56.06	\$5.30	\$37.42	\$23.94
04/25/02	\$59.18	\$53.88	\$5.30	\$35.24	\$23.94
04/26/02	\$59.60	\$54.30	\$5.30	\$35.66	\$23.94
04/29/02	\$57.25	\$51.95	\$5.30	\$34.55	\$22.70
04/30/02	\$58.29	\$52.99	\$5.30	\$34.95	\$23.34
05/01/02	\$57.70	\$52.40	\$5.30	\$35.09	\$22.61
05/02/02	\$57.43	\$52.13	\$5.30	\$35.51	\$21.92

**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
05/03/02	\$57.00	\$51.70	\$5.30	\$35.36	\$21.64
05/06/02	\$55.68	\$50.38	\$5.30	\$34.68	\$21.00
05/07/02	\$54.75	\$49.45	\$5.30	\$34.50	\$20.25
05/08/02	\$57.11	\$51.81	\$5.30	\$35.28	\$21.83
05/09/02	\$56.29	\$50.99	\$5.30	\$35.03	\$21.26
05/10/02	\$54.25	\$48.95	\$5.30	\$34.61	\$19.64
05/13/02	\$55.82	\$50.52	\$5.30	\$35.10	\$20.72
05/14/02	\$56.85	\$51.55	\$5.30	\$35.54	\$21.31
05/15/02	\$55.47	\$50.17	\$5.30	\$35.44	\$20.03
05/16/02	\$55.00	\$49.70	\$5.30	\$35.76	\$19.24
05/17/02	\$54.31	\$49.01	\$5.30	\$35.91	\$18.40
05/20/02	\$53.51	\$48.21	\$5.30	\$35.32	\$18.19
05/21/02	\$52.69	\$47.39	\$5.30	\$35.15	\$17.54
05/22/02	\$52.85	\$47.55	\$5.30	\$35.11	\$17.74
05/23/02	\$53.27	\$47.97	\$5.30	\$35.40	\$17.87
05/24/02	\$53.07	\$47.77	\$5.30	\$35.22	\$17.85
05/28/02	\$52.85	\$47.55	\$5.30	\$34.87	\$17.98
05/29/02	\$52.80	\$47.50	\$5.30	\$34.91	\$17.89
05/30/02	\$51.65	\$46.35	\$5.30	\$34.77	\$16.88
05/31/02	\$51.15	\$45.85	\$5.30	\$34.89	\$16.26
06/03/02	\$50.94	\$45.64	\$5.30	\$34.27	\$16.67
06/04/02	\$50.69	\$45.39	\$5.30	\$34.03	\$16.66
06/05/02	\$52.19	\$46.89	\$5.30	\$34.28	\$17.91
06/06/02	\$53.60	\$48.30	\$5.30	\$33.77	\$19.83
06/07/02	\$52.87	\$47.57	\$5.30	\$33.81	\$19.06
06/10/02	\$52.59	\$47.29	\$5.30	\$34.01	\$18.58
06/11/02	\$52.99	\$47.69	\$5.30	\$33.45	\$19.54
06/12/02	\$52.48	\$47.18	\$5.30	\$33.56	\$18.92
06/13/02	\$50.30	\$45.00	\$5.30	\$32.86	\$17.44
06/14/02	\$50.80	\$45.50	\$5.30	\$33.18	\$17.62
06/17/02	\$52.74	\$47.44	\$5.30	\$34.54	\$18.20
06/18/02	\$52.75	\$47.45	\$5.30	\$34.67	\$18.08
06/19/02	\$51.55	\$46.25	\$5.30	\$34.31	\$17.24
06/20/02	\$49.80	\$44.50	\$5.30	\$33.78	\$16.02
06/21/02	\$49.68	\$44.38	\$5.30	\$33.52	\$16.16
06/24/02	\$50.00	\$44.70	\$5.30	\$33.50	\$16.50
06/25/02	\$49.00	\$43.70	\$5.30	\$33.32	\$15.68
06/26/02	\$48.65	\$43.35	\$5.30	\$32.40	\$16.25
06/27/02	\$49.90	\$44.60	\$5.30	\$33.12	\$16.78
06/28/02	\$49.70	\$44.40	\$5.30	\$33.51	\$16.19
07/01/02	\$47.93	\$42.63	\$5.30	\$33.09	\$14.84
07/02/02	\$47.60	\$42.30	\$5.30	\$32.66	\$14.94
07/03/02	\$48.05	\$42.75	\$5.30	\$32.29	\$15.76
07/05/02	\$50.00	\$44.70	\$5.30	\$33.31	\$16.69
07/08/02	\$49.54	\$44.24	\$5.30	\$33.26	\$16.28
07/09/02	\$47.05	\$41.75	\$5.30	\$32.47	\$14.58

**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
07/10/02	\$44.07	\$38.77	\$5.30	\$31.59	\$12.48
07/11/02	\$45.00	\$39.70	\$5.30	\$31.86	\$13.14
07/12/02	\$46.30	\$41.00	\$5.30	\$31.61	\$14.69
07/15/02	\$45.67	\$40.37	\$5.30	\$31.50	\$14.17
07/16/02	\$46.10	\$40.80	\$5.30	\$31.09	\$15.01
07/17/02	\$42.37	\$37.07	\$5.30	\$30.78	\$11.59
07/18/02	\$42.41	\$37.11	\$5.30	\$29.85	\$12.56
07/19/02	\$40.72	\$35.42	\$5.30	\$29.39	\$11.33
07/22/02	\$38.84	\$33.54	\$5.30	\$28.46	\$10.38
07/23/02	\$36.29	\$30.99	\$5.30	\$26.99	\$9.30
07/24/02	\$39.97	\$34.67	\$5.30	\$28.29	\$11.68
07/25/02	\$38.80	\$33.50	\$5.30	\$28.23	\$10.57
07/26/02	\$37.66	\$34.56	\$3.10	\$28.98	\$8.68
07/29/02	\$39.85	\$36.75	\$3.10	\$30.66	\$9.19
07/30/02	\$40.30	\$37.20	\$3.10	\$30.75	\$9.55
07/31/02	\$42.67	\$39.57	\$3.10	\$31.18	\$11.49
08/01/02	\$41.26	\$38.16	\$3.10	\$30.63	\$10.63
08/02/02	\$39.45	\$36.35	\$3.10	\$29.86	\$9.59
08/05/02	\$36.98	\$33.88	\$3.10	\$28.87	\$8.11
08/06/02	\$39.72	\$36.62	\$3.10	\$29.66	\$10.06
08/07/02	\$38.28	\$35.18	\$3.10	\$30.00	\$8.28
08/08/02	\$40.96	\$37.86	\$3.10	\$31.36	\$9.60
08/09/02	\$40.45	\$37.35	\$3.10	\$31.72	\$8.73
08/12/02	\$39.70	\$36.60	\$3.10	\$31.41	\$8.29
08/13/02	\$37.80	\$34.70	\$3.10	\$30.74	\$7.06
08/14/02	\$38.09	\$35.93	\$2.16	\$31.70	\$6.39
08/15/02	\$39.60	\$37.44	\$2.16	\$31.99	\$7.61
08/16/02	\$37.54	\$37.22	\$0.32	\$31.78	\$5.76
08/19/02	\$37.75	\$37.43	\$0.32	\$32.53	\$5.22
08/20/02	\$36.75	\$36.43	\$0.32	\$32.10	\$4.65
08/21/02	\$37.15	\$36.83	\$0.32	\$32.17	\$4.98
08/22/02	\$40.65	\$40.33	\$0.32	\$32.51	\$8.14
08/23/02	\$37.80	\$37.48	\$0.32	\$31.95	\$5.85
08/26/02	\$39.08	\$38.76	\$0.32	\$32.31	\$6.77
08/27/02	\$37.70	\$38.58	-\$0.88	\$32.12	\$5.58
08/28/02	\$36.80	\$37.68	-\$0.88	\$31.58	\$5.22
08/29/02	\$36.38	\$37.26	-\$0.88	\$31.69	\$4.69
08/30/02	\$36.11	\$36.99	-\$0.88	\$31.78	\$4.33
09/03/02	\$33.36	\$35.45	-\$2.09	\$30.40	\$2.96
09/04/02	\$34.40	\$36.49	-\$2.09	\$30.87	\$3.53
09/05/02	\$33.36	\$35.45	-\$2.09	\$30.49	\$2.87
09/06/02	\$33.95	\$36.04	-\$2.09	\$30.85	\$3.10
09/09/02	\$36.33	\$38.42	-\$2.09	\$31.31	\$5.02
09/10/02	\$35.15	\$37.24	-\$2.09	\$30.99	\$4.16
09/11/02	\$35.43	\$37.52	-\$2.09	\$30.86	\$4.57
09/12/02	\$33.85	\$35.94	-\$2.09	\$30.12	\$3.73



**Household International, Inc. Common Stock**  
**Estimates of Alleged Artificial Inflation**

Date	Stock Price	Quantification Using Specific Disclosures		Quantification Including Leakage	
		True Value	Artificial Inflation	True Value	Artificial Inflation
09/13/02	\$34.67	\$36.76	-\$2.09	\$30.32	\$4.35
09/16/02	\$33.59	\$35.68	-\$2.09	\$30.24	\$3.35
09/17/02	\$29.52	\$31.61	-\$2.09	\$29.69	-\$0.17
09/18/02	\$29.85	\$31.94	-\$2.09	\$29.44	\$0.41
09/19/02	\$29.25	\$31.34	-\$2.09	\$28.52	\$0.73
09/20/02	\$29.05	\$31.14	-\$2.09	\$28.41	\$0.64
09/23/02	\$27.61	\$31.23	-\$3.62	\$28.46	-\$0.85
09/24/02	\$27.55	\$31.17	-\$3.62	\$27.90	-\$0.35
09/25/02	\$28.15	\$31.77	-\$3.62	\$28.39	-\$0.24
09/26/02	\$29.28	\$32.90	-\$3.62	\$28.94	\$0.34
09/27/02	\$27.64	\$31.26	-\$3.62	\$28.20	-\$0.56
09/30/02	\$28.31	\$31.93	-\$3.62	\$28.41	-\$0.10
10/01/02	\$28.40	\$32.02	-\$3.62	\$29.52	-\$1.12
10/02/02	\$27.32	\$30.94	-\$3.62	\$28.45	-\$1.13
10/03/02	\$26.60	\$30.22	-\$3.62	\$27.26	-\$0.66
10/04/02	\$24.66	\$29.54	-\$4.88	\$26.53	-\$1.87
10/07/02	\$23.25	\$28.13	-\$4.88	\$25.70	-\$2.45
10/08/02	\$23.58	\$28.46	-\$4.88	\$26.75	-\$3.17
10/09/02	\$21.00	\$25.88	-\$4.88	\$25.66	-\$4.66
10/10/02	\$26.30	\$26.98	-\$0.68	\$26.98	-\$0.68
10/11/02	\$28.20	\$28.20	\$0.00	\$28.20	\$0.00

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**JOINT PROPOSED JURY INSTRUCTIONS**

**[Exhibit H-1 to [Proposed] Final Pretrial Order]**

**I. PRELIMINARY INSTRUCTIONS**

**JOINT PROPOSED JURY INSTRUCTION NO. 1**

**Introduction**

Ladies and gentlemen: You are now the jury in this case, and I want to take a few minutes to tell you something about your duties as jurors and to give you some instructions. At the end of the trial, I will give you more detailed instructions. Those instructions will control your deliberations.

One of my duties is to decide all questions of law and procedure. From time to time during the trial and at the end of the trial, I will instruct you on the rules of law that you must follow in making your decision.

You should not take anything I may say or do during the trial as indicating what I think of the evidence or what your verdict should be.

From time to time during the trial I may be called upon to make rulings of law on objections or motions made by the lawyers. You should not infer or conclude from any ruling or other comment I may make that I have any opinions about how you should decide this case. And if I should sustain an objection to a question that goes unanswered by a witness, you should not guess or speculate what the answer might have been, and you should not draw any inferences or conclusions from the question itself.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit*, Appendix, “Introductory Paragraphs” & “Rulings on Objections” (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PROPOSED JOINT JURY INSTRUCTION NO. 2**

**Jury Conduct**

All jurors must follow certain rules of conduct, and you must follow them, too.

First, you must not discuss this case with anyone, including your fellow jurors, members of your family, people involved in the trial, or anyone else. You must not let others discuss the case with you. If anyone tries to talk to you about the case please let me know about it immediately.

Second, you must not read any news stories or articles or listen to any radio or television reports about the case or about anyone who has anything to do with it.

Third, you must not do any research, such as consulting dictionaries, searching the Internet or using other reference materials, and do not make any investigation about the case on your own.

Fourth, if you need to communicate with me, you must give a signed note to the [bailiff] [clerk] [law clerk] to give to me.

Fifth, you must not make up your mind about what the verdict should be until after you have gone to the jury room to decide that case and you and your fellow jurors have discussed the evidence. Keep an open mind until then.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit*, Appendix, "Jury Conduct" (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**JOINT PROPOSED JURY INSTRUCTION NO. 3**

**Order of Trial**

The trial will proceed in the following manner:

First, Plaintiff[s]'s attorney may make an opening statement. Next, Defendant[s]'s attorney may make an opening statement. An opening statement is not evidence but is simply a summary of what the attorney expects the evidence to be.

After the opening statements, Plaintiff will call witnesses and present evidence. Then, Defendant will have an opportunity to call witnesses and present evidence. After the parties' main cases are completed, Plaintiff may be permitted to present rebuttal evidence [and Defendant may be permitted to present sur-rebuttal evidence].

After the evidence has been presented, [I will instruct you on the law that applies to the case and the attorneys will make closing arguments] [the attorneys will make closing arguments and I will instruct you on the law that applies to the case].

After that, you will go to the jury room to deliberate on your verdict.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit*, Appendix, "Order of Trial" (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 4**

**Note Taking**

Any notes you take during this trial are only aids to your memory. The notes are not evidence. If you do not take notes, you should rely on your independent recollection of the evidence and not be unduly influenced by the notes of other jurors. Notes are not entitled to any greater weight than the recollections or impressions of each juror about the testimony.

When you leave the courthouse during the trial, your notes should be left in the [courtroom] [jury room] [envelope in the jury room]. When you leave at night, your notes will be secured and not read by anyone. At the end of the trial, your notes will be destroyed, and no one will be allowed to read the notes before they are destroyed.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit*, Appendix, “Note-Taking - Allowed” (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

## **II. IN-TRIAL INSTRUCTIONS**

**JOINT PROPOSED JURY INSTRUCTION NO. 5**

**Cautionary Instruction Before Recess**

We are about to take our first break during the trial, and I want to remind you of the instruction I gave you earlier. Until the trial is over, you are not to discuss this case with anyone, including your fellow jurors, members of your family, people involved in the trial, or anyone else. If anyone approaches you and tries to talk to you about the case, do not tell your fellow jurors but advise me about it immediately. Do not read or listen to any news reports of the trial. Finally, remember to keep an open mind until all the evidence has been received and you have heard the views of your fellow jurors.

I may not repeat these things to you before every break that we take, but keep them in mind throughout the trial.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 2.1 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 6**

**Stipulations of Fact**

The parties have stipulated, or agreed, that *[stipulated fact]*. You must now treat this fact as having been proved for the purpose of this case.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit 2.5 (2015).*

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:      \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 7**

**Judicial Notice**

I have decided to accept as proved the fact that [*accepted fact*]. You must now treat this fact as having been proved for the purpose of this case.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* 2.6 (2015).

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:     \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 8**

**Deposition as Substantive Evidence**

A deposition is the sworn testimony of a witness taken before trial. The witness is placed under oath to tell the truth and lawyers for each party may ask questions. The questions and answers are recorded.

The deposition of [*Witness*], which was taken on [*date*], is about to be presented to you. Deposition testimony is entitled to the same consideration and is to be judged, insofar as possible, in the same way as if the witness had been present to testify.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* 2.8 (2015).

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:     \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 9**

**Trial Testimony as Substantive Evidence**

**[To Be Used if Trial Testimony Is Admitted]**

The trial testimony at a prior proceeding in this case of [Witness], which was given on [date], is about to be presented to you. This testimony is entitled to the same consideration and is to be judged, insofar as possible, in the same way as if the witness had been present to testify.

Do not place any significance on the behavior or tone of voice of any person reading the questions or answers.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 2.8 (2015) (modified for trial testimony).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**JOINT PROPOSED JURY INSTRUCTION NO. 10**

**Summaries of Records as Evidence**

*Stipulated*

The parties agree that [*describe summary in evidence*] accurately summarize the contents of documents, records, or books. You should consider these summaries just like all of the other evidence in the case.

*Not Stipulated*

Certain [*describe summary in evidence*] is/are in evidence. [The original materials used to prepare those summaries also are in evidence.] It is up to you to decide if the summaries are accurate.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 2.12 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**III. END OF TRIAL INSTRUCTIONS**

**JOINT PROPOSED JURY INSTRUCTION NO. 11**

**Functions of the Court and the Jury**

Members of the jury, you have seen and heard all the evidence and arguments of the attorneys. Now I will instruct you on the law.

You have two duties as a jury. Your first duty is to decide the facts from the evidence in the case. This is your job, and yours alone.

Your second duty is to apply the law that I give you to the facts. You must follow these instructions, even if you disagree with them. Each of the instructions is important, and you must follow all of them.

Perform these duties fairly and impartially. Do not allow sympathy, prejudice, fear, or public opinion to influence you.

Nothing I say now, and nothing I said or did during the trial, is meant to indicate any opinion on my part about what the facts are or about what your verdict should be.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.01 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 12**

**What Is Not Evidence**

Certain things are not to be considered as evidence. I will list them for you:

First, if I told you to disregard any testimony or exhibits or struck any testimony or exhibits from the record, such testimony or exhibits are not evidence and must not be considered.

Second, anything that you may have seen or heard outside the courtroom is not evidence and must be entirely disregarded. This includes any press, radio, Internet or television reports you may have seen or heard. Such reports are not evidence and your verdict must not be influenced in any way by such publicity.

Third, questions and objections or comments by the lawyers are not evidence. Lawyers have a duty to object when they believe a question is improper. You should not be influenced by any objection, and you should not infer from my rulings that I have any view as to how you should decide the case.

Fourth, the lawyers' opening statements and closing arguments to you are not evidence. Their purpose is to discuss the issues and the evidence. If the evidence as you remember it differs from what the lawyers said, your memory is what counts.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.6 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 13**

**Note-Taking**

Any notes you have taken during this trial are only aids to your memory. The notes are not evidence. If you have not taken notes, you should rely on your independent recollection of the evidence and not be unduly influenced by the notes of other jurors. Notes are not entitled to any greater weight than the recollections or impressions of each juror about the testimony.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.7 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 14**

**Consideration of All Evidence Regardless of Who Produced**

In determining whether any fact has been proved, you should consider all of the evidence bearing on the question regardless of who introduced it.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* 1.8 (2015).

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:     \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

## **JOINT PROPOSED JURY INSTRUCTION NO. 15**

### **Limited Purpose of Evidence**

You will recall that during the course of this trial I instructed you that I admitted certain evidence only for a limited purpose. You must consider this evidence only for the limited purpose for which it was admitted.

During the trial I gave limiting instructions that apply to certain categories of evidence, including [describe categories of evidence]. I will not read those instructions again, but they are included in the instructions that you will take to the jury room and that you must follow in your deliberations.

Some evidence was admitted for the limited purpose of assisting you to evaluate an expert witness' opinion. Such evidence must not be used by you for any other purpose.

Certain evidence in this case is admitted for a limited purpose only to show that the contents were publicly available or whether they affected the price of Household stock. You must consider this evidence only for the limited purpose for which it was admitted.

First, a number of documents known as analyst reports were admitted in evidence. Analyst reports are written by market analysts employed by investment banks or brokerage firms, who comment on Household's business, its securities, and the economy in general. These exhibits are not admitted to show that what the analysts said was true. This evidence is admitted only to show that the contents of the analyst reports were publicly available or whether they affected the price of Household stock, and for no other purpose.

Second, certain documents called investor relations reports were admitted in evidence. Household's investor relations reports were prepared by Household employees for internal use within the company. The investor relations reports typically include quotations or excerpts from selected analyst reports. To the extent the investor relations reports quote from, attach or paraphrase statements made by analysts, you may consider those portions of the investor relations reports only for the limited purpose of showing that the contents of the analyst reports were publicly available or whether they affected the price of Household stock, and for no other purpose.

Third, some reports prepared by ratings agencies that relate to Household's financial condition were admitted. These reports were not admitted to show that what ratings agencies said was true. This evidence was admitted only to show that the contents of the ratings agencies' reports were publicly available or whether they affected the price of Household stock, and for no other purpose.

Fourth, a number of newspaper and magazine articles were admitted. These articles are not admitted to show that the contents of the articles were true. Unless I instruct you to the contrary, you are to consider newspaper or magazine articles only for the limited purpose of showing that the contents of the articles were publicly available or whether they affected the price of Household stock, and for no other purpose.

Authority: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*, Lead Case No. 02-C-5893, Jury Instructions as Given at First Trial (Dkt. No. 1614), at 6-8 (modified to omit presentations by Household executives).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**JOINT PROPOSED JURY INSTRUCTION NO. 16**

**Weighing the Evidence**

You should use common sense in weighing the evidence and consider the evidence in light of your own observations in life.

In our lives, we often look at one fact and conclude from it that another fact exists. In law we call this “inference.” A jury is allowed to make reasonable inferences. Any inference you make must be reasonable and must be based on the evidence in the case.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.11 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 17**

**Definition of “Direct” and “Circumstantial” Evidence**

You may have heard the phrases “direct evidence” and “circumstantial evidence.” Direct evidence is proof that does not require an inference, such as the testimony of someone who claims to have personal knowledge of a fact. Circumstantial evidence is proof of a fact, or a series of facts, that tends to show that some other fact is true.

As an example, direct evidence that it is raining is testimony from a witness who says, “I was outside a minute ago and I saw it raining.” Circumstantial evidence that it is raining is the observation of someone entering a room carrying a wet umbrella.

The law makes no distinction between the weight to be given to either direct or circumstantial evidence. You should decide how much weight to give to any evidence. In reaching your verdict, you should consider all the evidence in the case, including the circumstantial evidence.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.12 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 18**

**Testimony of Witnesses (Deciding What to Believe)**

You must decide whether the testimony of each of the witnesses is truthful and accurate, in part, in whole, or not at all. You also must decide what weight, if any, you give to the testimony of each witness.

In evaluating the testimony of any witness, including any party to the case, you may consider, among other things:

- the ability and opportunity the witness had to see, hear or know the things that the witness testified about;
- the witness's memory;
- any interest, bias, or prejudice the witness may have;
- the witness's intelligence;
- the manner of the witness while testifying;
- and the reasonableness of the witness's testimony in light of all the evidence in the case.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.13 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 19**

**Lawyer Interviewing Witness**

It is proper for a lawyer to meet with any witness in preparation for trial.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* 1.16 (2015).

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:     \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 20**

**Number of Witnesses**

You may find the testimony of one witness or a few witnesses more persuasive than the testimony of a larger number. You need not accept the testimony of the larger number of witnesses.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.17 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 21**

**Absence of Evidence**

The law does not require any party to call as a witness every person who might have knowledge of the facts related to this trial. Similarly, the law does not require any party to present as exhibits all papers and things mentioned during this trial.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.18 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 22**

**Expert Witnesses**

You have heard witnesses give opinions about matters requiring special knowledge or skill. You should judge this testimony in the same way that you judge the testimony of any other witness. The fact that such person has given an opinion does not mean that you are required to accept it. Give the testimony whatever weight you think it deserves, considering the reasons given for the opinion, the witness's qualifications, and all of the other evidence in the case.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.21 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 23**

**Demonstrative Exhibits**

Certain [*describe demonstrative exhibit, e.g., models, diagrams, devices, sketches*] have been shown to you. Those [*short description*] are used for convenience and to help explain the facts of the case. They are not themselves evidence or proof of any facts.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* 1.24 (2015).

GIVEN:           \_\_\_\_\_

REFUSED:        \_\_\_\_\_

MODIFIED:       \_\_\_\_\_

WITHDRAWN:     \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**JOINT PROPOSED JURY INSTRUCTION NO. 24**

**Burden of Proof – Preponderance of the Evidence**

When I say plaintiffs must prove something by “a preponderance of the evidence,” or when I use the expression “if you find,” or “if you decide,” this is what I mean: When you have considered all the evidence in the case, you must be persuaded that it is more probably true than not true.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.27 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**JOINT PROPOSED JURY INSTRUCTION NO. 25**

**Communications with Court**

I do not anticipate that you will need to communicate with me. If you do need to communicate with me, the only proper way is in writing. The writing must be signed by the presiding juror, or, if he or she is unwilling to do so, by some other juror. The writing should be given to the marshal, who will give it to me. I will respond either in writing or by having you return to the courtroom so I can respond orally.

If you do communicate with me, you should not indicate in your note what your numerical division is, if any.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.33 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

---

THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' ADDITIONAL PROPOSED JURY INSTRUCTIONS (WITH  
AUTHORITY)**

[Exhibit H-2 to [Proposed] Final Pretrial Order]

Plaintiffs hereby submit the attached proposed Jury Instructions (with authority).

DATED: April 22, 2016

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**A. PRELIMINARY INSTRUCTIONS**

## **PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 1**

### **Class Action**

This case is a “Class Action,” in which the named plaintiffs represent themselves and other unnamed persons or entities. A “Class Action” is a form of a lawsuit designed to permit the claims of a large group of persons, too numerous to be individual participants, to be tried by named plaintiffs, called the “Class representatives.” Each of the basic claims is made by the plaintiffs both personally and on behalf of each of the Class members. One court resolves the issues for all Class members.

Well before this case came to trial, this case was certified as a Class Action and three Class representatives were appointed. This Court ruled that the Class representatives had met the requirements under the federal laws to proceed on behalf of all persons who purchased or acquired Household International, Inc. securities between March 23, 2001 and October 11, 2002. That period of time is called the “Class Period.” The “securities” included in the Class are the common stock of Household. Any person who purchased Household securities during that period of time is eligible to be a Class member. Excluded from the Class are: (i) Household International, Inc.; (ii) William F. Aldinger (“Aldinger”), David A. Schoenholz (“Schoenholz”), and Gary D. Gilmer (“Gilmer”) (collectively, the “Individual Defendants”); (iii) members of the family of each Individual Defendant; (iv) any entity in which any defendant has a controlling interest; (v) officers and directors of Household; and (vi) the legal representatives, heirs, successors or assigns of any such excluded party. Any Class member who did not wish to be part of this lawsuit was allowed to “opt-out.” Whatever verdict you reach will be binding on each and every Class member, except for those who opted out.

For the purposes of my instructions to you and your deliberation of this case, I will refer to the Class representatives as “plaintiffs” and will use “plaintiffs” and “the Class” interchangeably. They are one and the same. You may also hear the terms “Class member” or “absent Class member.” This refers to the individual members of the Class who purchased Household stock during the Class Period. Those persons do not have to appear or testify at the trial in order for the

Class to prevail; and you should not draw any adverse or negative inference from the fact that members of the Class do not testify during the trial. Indeed, neither the plaintiffs nor any other Class member is required to appear in court personally to prove their case. Your verdict, however, will bind each and every member of the Class.

The fact that this is a Class Action in no way indicates whether or not the claims made on behalf of the plaintiff Class have merit. Your consideration of the facts and your verdict should not therefore be influenced in any regard merely because the litigation is presented in the form of a Class Action. Other than as I instruct you, you are not to draw any conclusions or reach any preconceptions, one way or another, by virtue of this being a Class Action.

Authority: Fed. R. Civ. P. 23; Minute Order of December 3, 2004 re: Class Action Certification; *Eisen v. Carlisle & Jacquelin*, 391 F.2d 555, 560 (2d Cir. 1968); *Basic Inc. v. Levinson*, 485 U.S. 224, 230-31 (1988); *Suchanek v. Sturm Foods, Inc.*, 764 F.3d 750, 759 (7th Cir. 2014); *Schleicher v. Wendt*, 618 F.3d 679, 681 (7th Cir. 2010); *Silverman v. Motorola, Inc.*, 259 F.R.D. 163, 169 (N.D. Ill. 2009).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

## **PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 2**

### **Purpose of the Securities Laws**

As you know, this case involves the purchase and sale of the publicly traded securities of Household. The plaintiff Class claims to have suffered a loss caused by the defendants' violations of the securities laws. Following the stock market crash of 1929, Congress passed laws to protect the integrity of the financial markets. The underlying idea of these laws is that full disclosure of material matters about securities that are bought and sold will protect the integrity of the marketplace. The laws involved in the claims in this case are §§10(b) and 20(a) of the Exchange Act and Rule 10b-5 promulgated thereunder by the SEC.

A security is an investment in an enterprise with the expectation of profit from the efforts of other people. One common type of security is stock.

The buying and selling of stocks is controlled by the securities laws. One who violates the securities laws is liable for damages caused by the violation. In particular, the securities laws prohibit misrepresentation of material facts or omission of material facts in connection with the purchase and sale of securities.

Congress enacted these laws to ensure fair dealing and to outlaw deceptive and inequitable practices by those selling or buying securities. The laws recognize that the purchase of a stock is different from the purchase of an item in the grocery store in that the average investor is not in a position to make a personal investigation to determine the worth, quality and value of securities.

Among the primary objectives of the Exchange Act and Rule 10b-5 are the maintenance of fair and honest securities markets and the elimination of manipulative practices that tend to distort the fair and just price of stock. Any deceptive or manipulative practices that influence trading activity undermines the function and purpose of a free market. The statutes and rules are designed to support investors' expectations that the securities markets are free from fraud and to prevent a wide variety of devices and schemes that are contrary to a climate of fair dealing. They are intended to replace the philosophy of caveat emptor (let the buyer beware) with a policy of full and accurate

disclosure. Such disclosure is designed to enable the investing public to make realistic appraisals about the merits of the securities so that investors may make informed investment decisions.

Authority: Adapted from 3B Kevin F. O'Malley *et al.*, *Federal Jury Practice and Instructions* §162.211 (5th ed. 2001); 4 Hon. Leonard B. Sand *et al.*, *Modern Federal Jury Instructions* ¶82.01, Instruction 82-2 (2008); *Basic Inc. v. Levinson*, 485 U.S. 224, 230-31, 234 (1988); *Herman & MacLean v. Huddleston*, 459 U.S. 375, 386-87 (1983); *Ernst & Ernst v. Hochfelder*, 425 U.S. 185, 195 (1976); *SEC v. Lauer*, 52 F.3d 667, 670 (7th Cir. 1995) (“A central purpose of the securities laws is to protect investors and would-be investors in the securities market against misrepresentations.”); *United States v. Parrott*, 425 F.2d 972, 977 (2d Cir. 1970) (“[T]he charge as to the purpose of the statute [is] useful to give the statute some coherence in the eyes of the jury which may not have been fully informed as to the meaning of the securities laws.”); *In re Kingate Mgt. Ltd. Litig.*, 784 F.3d 128, 136-137 (2d Cir. 2015) (noting that in response to the sudden and disastrous collapse of the stock market in 1929, and the Great Depression that followed, Congress passed the Securities Act of 1933 and the Securities Exchange Act of 1934; and that the congressional purpose underlying the 1934 Act was to promote free and open public securities markets and to protect the investing public from inequities that follow from trading that has been stimulated by the publication of false or misleading corporate information releases); *SEC v. Michel*, 521 F. Supp. 2d 795, 822 (N.D. Ill. 2007) (“The purpose underlying Section 10(b) is to promote the highest ethical standards . . . in every facet of the securities industry.”).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

### PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 3

#### Private Actions

Private lawsuits under the federal securities laws such as this Class Action are an important enforcement mechanism to supplement governmental regulations of the securities markets. Public policy encourages private actions as enforcement devices for the public interest. The major objective of the federal securities laws is to provide more protection to the investing public. To this end, private actions brought by investors such as this Class Action have long been viewed as a necessary supplement to United States Securities and Exchange Commission ("SEC") enforcement actions. Thus, the courts recognize that private actions provide an essential tool for the enforcement of the securities laws and are a necessary supplement to SEC action.

Authority: *Basic Inc. v. Levinson*, 485 U.S. 224, 230-31 (1988) ("Judicial interpretation and application, legislative acquiescence, and the passage of time have removed any doubt that a private cause of action exists for a violation of §10(b) and Rule 10b-5, and constitutes an essential tool for enforcement of the 1934 Act's requirements."); *Tellabs, Inc. v. Makor Issues & Rights, Ltd.*, 551 U.S. 308, 313 (2007) ("This Court has long recognized that meritorious private actions to enforce federal antifraud securities laws are an essential supplement to criminal prosecutions and civil enforcement actions brought, respectively, by the Department of Justice and the Securities and Exchange Commission (SEC)."); *Dura Pharm., Inc. v. Broudo*, 544 U.S. 336, 345 (2005) (The securities statutes "seek to maintain public confidence in the marketplace. . . . [and] do so by deterring fraud, in part, through the availability of private securities fraud actions.").

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 4**

**The Prior Proceedings**

There have been prior proceedings in this case that have partially resolved certain claims brought by plaintiffs. Your duty, as jurors, will be to resolve the remaining elements of those claims. **[At this point, the Court should provide the jurors with a summary of the prior proceedings.]**

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**B. GENERAL INSTRUCTIONS**

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 5**

**All Litigants Equal Before the Law**

In this case, one of the defendants is a corporation. All parties are equal before the law. A corporation is entitled to the same fair consideration that you would give any individual person.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.03 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 6**

**Evidence**

The evidence consists of the testimony of the witnesses, the exhibits admitted in evidence, and stipulations.

A stipulation is an agreement between both sides that certain facts are true. If the parties have stipulated to a fact, you must accept that fact as proved.

I have taken judicial notice of certain facts. You must accept these facts as proved.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.04 (2015) (modified to add sentence that stipulated facts must be accepted as proved).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 7**

**Deposition Testimony and Trial Testimony**

During the trial, certain testimony was presented to you by deposition videos and by persons reading questions and answers of trial testimony from a prior proceeding. You should give this testimony the same consideration you would give it had the witnesses appeared and testified here in court.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.05 (2015) (modified for trial testimony).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**C. WITNESS TESTIMONY**

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 8**

**Bias**

In deciding whether to believe a witness, you should specifically note any evidence of hostility or affection that the witness may have towards one of the parties. Likewise, you should consider evidence of any other interest or motive that the witness may have in cooperating with a particular party.

It is your duty to consider whether the witness has permitted any such bias or interest to color his or her testimony. In short, if you find that a witness is biased, you should view his or her testimony with caution, weight it with care and subject it to close and searching scrutiny.

Authority: 4 Hon. Leonard B. Sand *et al.*, *Modern Federal Jury Instructions* ¶76.01, Instruction 76-2 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 9**

**Interest in Outcome**

In evaluating the credibility of the witnesses, you should take into account any evidence that a witness may benefit in some way from the outcome of the case. Such interest in the outcome creates a motive to testify falsely and may sway a witness to testify in a way that advances his or her own interests. Therefore, if you find that any witness whose testimony you are considering may have an interest in the outcome of this trial, then you should bear that factor in mind when evaluating the credibility of his or her testimony, and accept it with great care.

Keep in mind, though, that it does not automatically follow that testimony given by an interested witness is to be disbelieved. There are many people who, no matter what their interest in the outcome of the case may be, would not testify falsely. It is for you to decide, based on your own perceptions and common sense, to what extent, if at all, the witness's interest has affected his or her testimony.

Authority: 4 Hon. Leonard B. Sand *et al.*, *Modern Federal Jury Instructions* ¶76.01, Instruction 76-3 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

---

THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 10**

**Discrepancies in Testimony**

You are the sole judges of the credibility, that is the believability, of the witnesses and the weight their testimony deserves. You may be guided by the appearance and conduct of a witness, or by the manner in which a witness testifies, or by the character of the testimony given, or by evidence contrary to the testimony.

You should carefully examine all the testimony given, the circumstances under which each witness has testified, and every matter in evidence tending to show whether a witness is worthy of belief. Consider each witness's intelligence, motive and state of mind, and demeanor or manner while testifying.

Consider the witness's ability to observe the matters as to which the witness has testified, and whether the witness impresses you as having an accurate recollection of these matters. Also, consider any relation each witness may have with either side of the case, the manner in which each witness might be affected by the verdict, and the extent to which the testimony of each witness is either supported or contradicted by other evidence in the case.

Inconsistencies or discrepancies in the testimony of a witness, or between the testimony of different witnesses may or may not cause you to discredit such testimony. Two or more persons seeing an event may see or hear it differently.

In weighing the effect of a discrepancy, always consider whether it pertains to a matter of importance or an unimportant detail, and whether the discrepancy results from innocent error or intentional falsehood.

After making your own judgment, you will give the testimony of each witness such weight, if any, that you may think it deserves. In short, you may accept or reject the testimony of any witness, in whole or in part.



Authority: 3 Kevin F. O'Malley *et al.*, *Federal Jury Practice and Instructions* §105.01 (6th ed. 2011) (modified to add the phrase "that is the believability" in the first sentence; and to omit the last paragraph, which is duplicative of Federal Civil Jury Instruction of the Seventh Circuit 1.17).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 11**

**Prior Inconsistent Statements [or Acts]**

You may consider statements given by *[Party]* *[Witness under oath]* before trial as evidence of the truth of what he or she said in the earlier statements, as well as in deciding what weight to give his or her testimony.

With respect to other witnesses, the law is different. If you decide that, before the trial, one of these witnesses made a statement [not under oath] [or acted in a manner] that is inconsistent with his or her testimony here in court, you may consider the earlier statement [or conduct] only in deciding whether his or her testimony here in court was true and what weight to give to his or her testimony here in court.

[In considering a prior inconsistent statement[s] [or conduct], you should consider whether it was simply an innocent error or an intentional falsehood and whether it concerns an important fact or an unimportant detail.]

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.14 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 12**

**Adverse Inference from Missing Witness**

*[Witness]* was mentioned at trial but did not testify. You may, but are not required to, assume that *[Witness's]* testimony would have been unfavorable to [plaintiffs] [defendant].

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.19 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 13**

**Cumulative Evidence**

Individual pieces of evidence, insufficient in themselves to prove a point, may in cumulation prove it. The sum of an evidentiary presentation may well be greater than its constituent parts. A piece of evidence, unreliable in isolation, may become quite probative when corroborated by other evidence.

Authority: *Bourjaily v. United States*, 483 U.S. 171, 179-80 (1987); *NutraSweet Co. v. X-L Eng'r. Co.*, 227 F.3d 776, 789 (7th Cir. 2000) (Holding that an expert witness was permitted to “combine” different pieces of information to “come up with a theory (or opinion)” and citing *Huddleston v. United States*, 485 U.S. 681, 691 (1988) for the principle that “[i]ndividual pieces of evidence, insufficient in themselves to prove a point, may in cumulation prove it. The sum of an evidentiary presentation may well be greater than its constituent parts.”); *Ossola v. Am. Express Co.*, No. 13 C 4836, 2015 U.S. Dist. LEXIS 167956, at \*10 n.7 (N.D. Ill. Dec. 16, 2015) (“As Dean McCormick has aptly phrased it, to be relevant, evidence need only be a brick, not a wall.”); *City of Joliet v. Mid-City Nat. Bank of Chicago*, 05 C 6746, 2012 U.S. Dist. LEXIS 160485, at \*12-\*13 (N.D. Ill. Nov. 5, 2012) (“[I]ndividual pieces of evidence insufficient in themselves to prove a point may in cumulation prove it. The sum of an evidentiary presentation may well be greater than its constituent parts.”).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 14**

**Electronic Mail (E-mail) Presumptively Received**

To the extent the evidence presented to you involves e-mail communications, you must presume that such e-mail communications were actually received by the intended recipients.

Authority: *Ball v. Kotter*, 723 F.3d 813, 830 (7th Cir. 2013) (referring to “letters and emails” and stating that “[a] presumption exists that they were all properly sent, received, and read”); *In re Kubiak-Leventhal*, Nos. 10 B 12257, 11 A 1467, 2012 Bankr. LEXIS 1328, at \*11-\*14 (Bankr. N.D. Ill. Mar. 22, 2012) (stating that “[a] properly addressed item mailed to someone is presumed to have been received, and courts have recently applied this presumption to e-mail”), *aff’d*, 481 B.R. 409 (N.D. Ill. 2012); *SEC v. Spiegel, Inc.*, No. 03 C 1685, 2003 WL 22176223 (N.D. Ill. Sept. 15, 2003).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**D. PARTICULAR TYPES OF EVIDENCE**

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 15**

**Charts and Summaries in Evidence**

Stipulated

The parties agree that [*describe summary in evidence*] accurately summarizes the contents of documents, records, or books. You should consider these summaries just like all of the other evidence in the case.

Not Stipulated

Certain [*describe summary in evidence*] is/are in evidence. [The original materials used to prepare those summaries also are in evidence]. It is up to you to decide if the summaries are accurate.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.23 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 16**

**Burden of Proof Where Some Jurors Have Served on Jury in Criminal Case**

Those of you who have participated in criminal cases will have heard of “proof beyond a reasonable doubt.” The standard of proof in a criminal case is a stricter standard, requiring more proof than a preponderance of evidence. The reasonable doubt standard does not apply to a civil case and you should put that standard out of your mind.

Authority: 3 Kevin F. O'Malley *et al.*, *Federal Jury Practice and Instructions* §104.03 (6th ed. 2011).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**E. SECTION 10(b) INSTRUCTIONS**

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 17**

**Rule 10b-5 Defined**

I will now instruct you concerning plaintiffs' claim against the defendants under §10(b) and Rule 10b-5. Plaintiffs' claims are based on alleged violations of §10(b) of the Exchange Act. Section 10(b) provides:

It shall be unlawful for any person, directly or indirectly . . . .

\* \* \*

To use or employ, in connection with the purchase or sale of any security registered on a national securities exchange or any security not so registered, . . . any manipulative or deceptive device or contrivance in contravention of such rules and regulations as the [Securities and Exchange] Commission may prescribe as necessary or appropriate in the public interest or for the protection of investors.

One of the rules promulgated by the SEC in the public interest and for the protection of investors is Rule 10b-5, which reads as follows:

**Employment of manipulative and deceptive devices.**

It shall be unlawful for any person, directly or indirectly, by the use of any means or instrumentality of interstate commerce, or of the mails or of any facility of any national securities exchange,

- (a) To employ any device, scheme, or artifice to defraud,
- (b) To make any untrue statement of a material fact or to omit to state a material fact necessary in order to make the statement made, in the light of the circumstances under which they were made, not misleading, or
- (c) To engage in any act, practice, or course of business which operates or would operate as a fraud or deceit upon any person, in connection with the purchase or sale of any security.

Authority: 15 U.S.C. §78j(b); 17 C.F.R. §240.10b-5; 3B Kevin F. O'Malley *et al.*, *Federal Jury Practice and Instructions* §162.220 (5th ed. 2001); *see also* 4 Hon. Leonard B. Sand *et al.*, *Modern Federal Jury Instructions* ¶82.01, Instruction 82-1 (2008).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 18**

**Elements for Primary Liability Under Section 10(b)**

Plaintiffs contend that defendants Household, Aldinger, Schoenholz and Gilmer violated §10(b) of the Exchange Act and Rule 10b-5 by making various false or misleading statements. To establish their claim under §10(b), plaintiffs must establish, by a preponderance of the evidence, each of the six following elements:

1. FIRST ELEMENT: The defendants made untrue statements of material facts or omitted material facts necessary under the circumstances to keep the statements that were made from being misleading. You are instructed that at a prior proceeding in this case, plaintiffs already proved that defendants made 17 false and misleading statements. Plaintiffs also proved that defendants' false and misleading statements and omissions were material. A statement of fact or omission is material if there is a substantial likelihood that a reasonable investor would have considered it important in deciding whether to buy or sell Household stock. An important statement or omission is one that a reasonable investor would view as significantly altering the total mix of information to be considered in deciding whether to buy or sell Household stock. Therefore, you must now treat this element as having been proved for the purpose of this case.

2. SECOND ELEMENT: The defendants acted either knowingly or recklessly. Again, you are instructed that at a prior proceeding in this case, plaintiffs already proved that defendants made the 17 false and misleading statements or omissions either knowingly or recklessly. This means that defendants made statements of material fact knowing that they were false or misleading or with reckless disregard for a substantial risk that they were false or misleading. Defendants also failed to disclose material facts with reckless disregard for a substantial risk that the omission would make another statement they made on the same subjects misleading. Plaintiffs proved that defendants' conduct was an extreme departure from the standards of ordinary care and defendants

knew either that this conduct presented a risk of misleading investors or the risk was so obvious that they had to have been aware of it. Defendant Household, which can only act through its employees, had the required state of mind with respect to the 17 false statements and omissions because defendants William Aldinger, David Schoenholz and Gary Gilmer made the statements or omissions knowingly or recklessly while acting within the scope of their employment. Therefore, you must now treat this element as having been proved for the purpose of this case.

3. THIRD ELEMENT: Plaintiffs relied on the defendants' untrue statement of a material fact or on the defendants' omission to state a necessary material fact in buying or selling securities. Again, you are instructed that at a prior proceeding, plaintiffs already proved this element. Therefore, you must now treat this element as having been proved for the purpose of this case.

4. FOURTH ELEMENT: The defendants used, or caused the use of, an instrumentality of interstate commerce – such as the mails, a telephone, or any facility of a national securities exchange – in connection with the purchase or sale of securities, regardless of whether the instrumentality was used to make an untrue statement or a material omission. Defendants do not contest this fact. Therefore, you must now treat this element as having been proved for the purpose of this case.

5. FIFTH ELEMENT: The defendants' misleading statements or omissions were a substantial factor in causing plaintiffs' economic loss.

6. SIXTH ELEMENT: The plaintiffs suffered damages as a result of the defendants' conduct.

If you find that plaintiffs have proved both elements 5 and 6, your verdict should be for the plaintiffs and against defendants. If you find that the plaintiffs have not proved elements 5 or 6, your verdict should be for the defendants and against the plaintiffs.

Authority: *Lawrence E. Jaffe Pension Plan v. Household International, Inc.*, No. 02-C-5893, Jury Instructions as Given at First Trial (Dkt. No. 1614), at 28-30; 15 U.S.C. §78j(b); 17 C.F.R. §240.10b-5(b); 3B Kevin F. O'Malley *et al.*, *Federal Jury Practice and Instructions* §§162.210, 162.230 (5th ed. 2001) (modified); *Caremark, Inc. v. Coram Healthcare Corp.*, 113 F.3d 645 (7th Cir. 1997); *Otto v. Variable Annuity Life Ins. Co.*, 134 F.3d 841 (7th Cir. 1998); *Tricontinental Indus. v. PricewaterhouseCoopers, LLP*, 475 F.3d 824 (7th Cir. 2007); *Glickenhau & Co. v. Household Int'l, Inc.*, 787 F.3d 408 (7th Cir. 2015); *Halliburton Co. v. Erica P. John Fund, Inc.*, \_\_\_ U.S. \_\_\_, 134 S. Ct. 2398 (2014); *Schleicher v. Wendt*, 618 F.3d 679 (7th Cir. 2010).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 19**

**Section 10(b) – Loss Causation**

To meet the fifth element of their 10b-5 claim against defendants as to any false or misleading statement or omission of material fact, plaintiffs must prove that one or more of the 17 proven false statements or omissions was a substantial cause of the economic loss plaintiffs suffered. Plaintiffs do not have to prove that the false statements or omissions were the sole cause of plaintiffs' loss.

A statement or omission of material fact is a substantial cause of plaintiffs' loss if (1) it causes Household's stock price to be higher than it would be if the statement had not been made or the concealed fact had been disclosed; and (2) the market's discovery of the truth about that statement or omission causes Household's stock price to decrease. The truth may be revealed to the market through a single disclosure or a series of disclosures made by any person or entity.

Authority: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*, Lead Case No. 02-C-5893, Jury Instructions as Given at First Trial (Dkt. No. 1614), at 32 (modified).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 20**

**Damages**

If you find that plaintiffs have proved the element of loss causation, then you must determine the amount of per share damages, if any, to which plaintiffs are entitled. Plaintiffs can recover only actual damages, which is the difference between the price plaintiffs paid for each share of Household stock and the price each share would have cost if no false or misleading statement or omission of material fact had occurred, in other words, the measure of inflation in the stock price. This is the only damages calculation you will be asked to make in this case. Any damages you award must have a reasonable basis in the evidence. Damages need not be proved with mathematical certainty but there must be enough evidence for you to make a reasonable estimate of damages.

Authority: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*, Lead Case No. 02-C-5893, Jury Instructions as Given at First Trial (Dkt. No. 1614), at 34.

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE



**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 21**

**Section 10(b) – Apportionment of Responsibility**

I have prepared a special verdict form for you to use in recording your verdict. This special verdict form is made up of questions concerning the important issues in this case. Some of these questions are to be answered either “yes” or “no” as indicated, and others are to be answered with numbers or percentages as indicated.

If you find that the Class is entitled to an award of damages for the §10(b) claim, the verdict form requires you to answer an additional question with respect to Household, William F. Aldinger, David A. Schoenholz, and Gary D. Gilmer. With respect to each of these defendants, your verdict form must indicate the percentage of responsibility of that person for the loss incurred by the Class. In determining the percentage of responsibility of each person, you should consider: (i) the nature of the conduct of each defendant you find contributed to the plaintiffs’ loss and (ii) the nature and extent of the causal relationship between each defendant’s conduct and plaintiffs’ losses.

Authority:     *See* 15 U.S.C. §78u-4(f)(3); 3B Kevin F. O’Malley *et al.*, *Federal Jury Practice and Instructions* §162.335 (5th ed. 2001).

GIVEN:                     \_\_\_\_\_

REFUSED:                \_\_\_\_\_

MODIFIED:              \_\_\_\_\_

WITHDRAWN:            \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 22**

**Liability of a Corporation**

Household is liable for any violation of 10b-5 that you find defendants William Aldinger, David Schoenholz, Gary Gilmer, or any other Household employee committed while acting within the scope of his or her employment and trying to further Household's goals. A Household officer or employee acts within the scope of his or her employment when transacting business Household assigned to him or her or doing anything that can reasonably be considered to be part of his or her employment.

Authority: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*, Lead Case No. 02-C-5893, Jury Instructions as Given at First Trial (Dkt. No. 1614), at 33.

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**F. CONDUCT OF DELIBERATIONS**

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 23**

**Duty to Deliberate**

Upon retiring to the jury room, you must select a presiding juror. The presiding juror will preside over your deliberations and will be your representative here in court.

Forms of verdict have been prepared for you. Take these forms to the jury room, and when you have reached unanimous agreement on the verdict, your presiding juror will fill in and date the appropriate form, and all of you will sign it.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* 1.32 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**PLAINTIFFS' PROPOSED JURY INSTRUCTION NO. 24**

**Disagreement Among Jurors**

The verdict[s] must represent the considered judgment of each juror. Your verdict[s], whether for or against the parties, must be unanimous.

You should make every reasonable effort to reach a verdict. In doing so, you should consult with one another, express your own views, and listen to the opinions of your fellow jurors. Discuss your differences with an open mind. Do not hesitate to reexamine your own views and change your opinion if you come to believe it is wrong. But you should not surrender your honest beliefs about the weight or effect of evidence solely because of the opinions of other jurors or for the purpose of returning a unanimous verdict.

All of you should give fair and equal consideration to all the evidence and deliberate with the goal of reaching an agreement that is consistent with the individual judgment of each juror. You are impartial judges of the facts.

Authority: Federal Civil Jury Instructions of the Seventh Circuit 1.34 (2015).

GIVEN: \_\_\_\_\_

REFUSED: \_\_\_\_\_

MODIFIED: \_\_\_\_\_

WITHDRAWN: \_\_\_\_\_

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THE HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' OBJECTIONS TO  
PLAINTIFFS' PROPOSED JURY INSTRUCTIONS**

**[Exhibit H-3 to [Proposed] Final Pretrial Order]**

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**A. PRELIMINARY INSTRUCTIONS**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 1  
(Class Action)**

Defendants object to Plaintiffs' proposed "class action" instruction. It is prejudicially biased in favor of Plaintiffs and provides the jury with much unnecessary information and detail that will be confusing and that could be interpreted to imply that the Court has a position on the merits of the litigation. More specifically:

- Paragraph 1, Sentence 2: Defendants object to the phrase "too numerous to be individual participants."
- Paragraph 2, Sentence 1: Defendants object to the entire sentence.
- Paragraph 2, Sentence 2: Defendants object to the reference to prior rulings and would rephrase simply to state that the class representatives are proceeding on behalf of persons who acquired Household securities during the class period.
- Paragraph 2, Sentences 4-8: Defendants object to the sentences in their entirety and would replace them by simply adding "with the exception of the defendants, officers and directors of Household, and any persons related to them" to the end of sentence 2.
- Paragraph 3: Defendants object to the entire paragraph, with the exception of the final sentence.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 2**  
**(Purpose of the Securities Laws)**

Defendants object to Plaintiffs' proposed "purpose of the securities laws" instruction in its entirety. It is unnecessary and prejudicial.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 3**  
**(Private Actions)**

Defendants object to Plaintiffs' proposed "private actions" instruction in its entirety. It is unnecessary and prejudicial.

**OBJECTIONS TO PLAINTIFFS' INSTRUCTION NO. 4**  
**(The Prior Proceedings)**

Defendants object to Plaintiffs' proposed "prior proceedings" instruction for the same reasons that Defendants object to Plaintiffs' proposed "summary of the prior proceedings," which is incorporated by reference in the proposed instruction.

**B. GENERAL INSTRUCTIONS**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 5  
(All Litigants Equal Before the Law)**

Defendants object to Plaintiffs' proposed "all litigants equal before the law" instruction to the extent that it states that "one of the defendants is a corporation" but fails to acknowledge that some of the Plaintiffs are also entities.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 6  
(Evidence)**

Defendants do not object to Plaintiffs' proposed "evidence" instruction.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 7  
(Deposition Testimony and Trial Testimony)**

Defendants do not object to Plaintiffs' proposed "deposition testimony and trial testimony" instruction if this Court rules that any of Plaintiffs' proposed prior trial testimony is admissible in this trial. Defendants preserve their objections to Plaintiffs' efforts to introduce prior trial testimony.

**C. WITNESS TESTIMONY**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 8  
(Bias)**

Defendants object to Plaintiffs' proposed "bias" instruction in its entirety. It is unnecessary, duplicative of Joint Proposed Instruction No. 18 - Testimony of Witnesses (Deciding What to Believe), and not included in the Seventh Circuit Pattern Instructions.



**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 9  
(Interest in Outcome)**

Defendants object to Plaintiffs' proposed "interest in outcome" instruction in its entirety. It is unnecessary, duplicative of Joint Proposed Instruction No. 18 - Testimony of Witnesses (Deciding What to Believe), and not included in the Seventh Circuit Pattern Instructions.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 10  
(Discrepancies in Testimony)**

Defendants object to Plaintiffs' proposed "discrepancies in testimony" instruction in its entirety. It is unnecessary, duplicative of Joint Proposed Instruction No. 18 - Testimony of Witnesses (Deciding What to Believe), and not included in the Seventh Circuit Pattern Instructions.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 11  
(Prior Inconsistent Statements [or Acts])**

Defendants do not object to Plaintiffs' proposed "prior inconsistent statements [or acts]" instruction. Defendants have proposed their own instruction, Additional Proposed Instruction No. 6, concerning prior inconsistent statements or act, which modifies the Seventh Circuit Pattern Instruction to be gender neutral.

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**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 12**  
**(Adverse Inference from Missing Witness)**

Defendants object to Plaintiffs' proposed "adverse inference from missing witness" instruction in its entirety, absent a demonstration of conduct relevant to this trial that establishes adequate grounds for an adverse inference.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 13  
(Cumulative Evidence)**

Defendants object to Plaintiffs' proposed "cumulative evidence" instruction in its entirety. It is unnecessary, duplicative, partially common sense, and partially suggestive of an incorrect legal standard. It is misleading to the extent that it suggests that evidence that is "unreliable" can be the basis for finding a fact proven. It is common sense to the extent that it instructs the jury that individual pieces of evidence may, when combined, prove a point that they do not prove in isolation.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 14  
(Electronic Mail (E-mail) Presumptively Received)**

Defendants object to Plaintiffs' proposed "electronic mail (e-mail) presumptively received" instruction in its entirety. It is generally unnecessary and, if a dispute were to arise about whether an email was received, then a presumption would be inappropriate.

**D. PARTICULAR TYPES OF EVIDENCE**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 15  
(Charts and Summaries in Evidence)**

Defendants do not object to Plaintiffs' proposed "charts and summaries in evidence" instruction to the extent that charts and summaries are admitted at trial.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 16  
(Burden of Proof Where Some Jurors Have Served on Jury in Criminal Case)**

Defendants object to Plaintiffs' proposed "burden of proof where some jurors have served on jury in criminal case" instruction in its entirety. It is unnecessary and confusing to the jury unless "proof beyond a reasonable doubt" is actually mentioned during the trial.



**E. SECTION 10(b) INSTRUCTIONS**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 17  
(Rule 10b-5 Defined)**

Defendants object to Plaintiffs' proposed "Rule 10b-5 defined" instruction in its entirety.

It is unnecessary, prejudicial, and highly confusing for the jury.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 18  
(Elements for Primary Liability Under Section 10(b))**

Defendants object to Plaintiffs' proposed "elements for primary liability under Section 10(b)" instruction. Specifically, Defendants object to instructing the jury about elements that it will not be asked to find. Doing so is unnecessary and confusing.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 19**  
**(Section 10(b) – Loss Causation)**

Defendants object to Plaintiffs' proposed "loss causation" instruction to the extent that it differs from Defendants' proposed loss causation instruction. The particulars of Defendants' proposed loss causation instruction (Additional Proposed Instruction No. 9) are necessary to instruct the jury correctly and clearly about loss causation in this case.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 20  
(Damages)**

Defendants object to Plaintiffs' proposed "damages" instruction to the extent that it differs from Defendants' proposed damages, i.e., inflation, instruction. The particulars of Defendants' proposed instruction (Additional Proposed Instruction No. 10) are necessary to instruct the jury correctly and clearly about damages, i.e., inflation, in this case.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 21**  
**(Section 10(b) – Apportionment of Responsibility)**

Defendants object to Plaintiffs' proposed "apportionment of responsibility" instruction.

In particular:

- Paragraph 1: Defendants object to this paragraph in its entirety. It is unnecessary, confusing, and inappropriately highlights apportionment among the other questions on the verdict form.
- Paragraph 2, Sentence 2: Defendants object to this sentence because it fails to clarify that the jury may conclude that a particular Defendant was not responsible for any of the alleged loss. Defendants also note that, for consistency, the instruction should refer to "Plaintiffs," not "the Class."

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 22  
(Liability of a Corporation)**

Defendants object to Plaintiffs' proposed "liability of a corporation" instruction in its entirety. Liability has already been determined at the first trial and will not be a question for this jury to answer. The instruction is unnecessary.

**F. CONDUCT OF DELIBERATIONS**

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 23  
(Duty to Deliberate)**

Defendants object to Plaintiffs' proposed "duty to deliberate" instruction to the extent that it fails to clarify that the jury's verdict must be unanimous on every question.

**OBJECTIONS TO PLAINTIFFS' PROPOSED INSTRUCTION NO. 25  
(Disagreement Among Jurors)**

Defendants object to Plaintiffs' proposed "disagreement among jurors" instruction to the extent that it fails to clarify that the jury's verdict must be unanimous on every question.



Respectfully submitted,

DATED: 4/22/2016

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DATED: 4/22/2016

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**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)  
Situating, )  
 )  
Plaintiff, ) CLASS ACTION  
 )  
vs. ) Honorable Jorge L. Alonso  
 )  
 )  
HOUSEHOLD INTERNATIONAL, INC., et )  
al., )  
 )  
Defendants. )  
 )

**PLAINTIFFS' [PROPOSED] VERDICT FORM**

**[Exhibit H-4 to [Proposed] Final Pretrial Order]**

## VERDICT FORM

### **Question No. 1:**

Have plaintiffs proven that defendants' false statements caused them damages for their Section 10(b)/Rule 10b-5 claim?

Yes \_\_\_\_\_

No \_\_\_\_\_

If you answered "yes" to Question No. 1, please proceed to Question No. 2.

### **Question No. 2:**

Determine which model reasonably estimates plaintiffs' damages:

\_\_\_\_\_ Leakage Model (Plaintiffs' Ex. 2125) reasonably estimates damages.

\_\_\_\_\_ Plaintiffs' Specific Disclosures Model (Plaintiffs' Ex. 2124) reasonably estimates damages.

\_\_\_\_\_ Other

Write the amount of loss per share, if any, that, according to the model you have chosen, any defendant's conduct caused plaintiffs to suffer on each of the dates set forth in Table A (if no loss was caused on any date, write "none" or "0"). If you choose "other," write in the amount you estimate plaintiffs have suffered due to defendants' conduct on Table A.

### **Question No. 3:**

You must determine what percentage of responsibility, if any, for any loss plaintiffs suffered is due to the conduct of defendants Household, William Aldinger, David Schoenholz and Gary Gilmer. In making this determination, you should consider the nature of the conduct of each person found to have caused or contributed to plaintiffs' loss and the nature and extent of the causal relationship between each such person's conduct and plaintiffs' loss:

Household \_\_\_\_\_

William Aldinger \_\_\_\_\_

David Schoenholz \_\_\_\_\_

Gary Gilmer \_\_\_\_\_

TOTAL \_\_\_\_\_ (this amount must equal 100%)

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF ILLINOIS**  
**EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

---

**DEFENDANTS' OBJECTIONS TO**  
**PLAINTIFFS' PROPOSED VERDICT FORM**

**[Exhibit H-5 to [Proposed] Final Pretrial Order]**

### **OBJECTIONS TO PLAINTIFFS' PROPOSED VERDICT FORM**

Defendants object to Plaintiffs' proposed verdict form to the extent that it differs from Defendants' proposed verdict form. Plaintiffs' proposed verdict form is legally insufficient and does not require necessary jury findings with respect to the contested issues subject to retrial. The particulars of Defendants' proposed verdict form are necessary to correctly and clearly reflect the law, the likely evidence, and the jury's inquiry with respect to each of the three questions. The parties expect to submit more detailed briefing on this and related issues.

Respectfully submitted,

DATED: 4/22/2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' ADDITIONAL PROPOSED JURY INSTRUCTIONS**

**[Exhibit H-6 to [Proposed] Final Pretrial Order]**

### **PRELIMINARY STATEMENT**

Pursuant to Local Rule 16.1.1, Household International, Inc., William F. Aldinger, David A. Schoenholz, and Gary Gilmer submit the following proposed jury instructions and verdict form in addition to the joint proposed jury instructions submitted by all the parties. We respectfully request the ability to amend or supplement these proposed instructions and requests, or to withdraw proposed instructions, as necessary based on the contents of any opinions or rulings issued by the Court, our review of Plaintiffs' proposed instructions, the outcome of various pending and anticipated motions, any rulings the Court may render in charging conferences or during the course of the trial, or the evidence adduced at trial.

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**I. DEFENDANTS' ADDITIONAL PROPOSED PRETRIAL INSTRUCTIONS**

**ADDITIONAL PROPOSED INSTRUCTION NO. 1  
(Claims, Defenses, and Prior Proceedings)**

There have been prior proceedings in this case that have partially resolved plaintiffs' claims. Your duty will be to resolve the remaining elements of those claims. *[Read short statement about prior proceedings and stipulations.]*

The positions of the parties regarding the remaining elements that you must decide can be summarized as follows:

Plaintiffs \_\_\_\_\_ claim that *[describe]*.

Defendants Household, William Aldinger, David Schoenholz, and Gary Gilmer deny those claims *[and also contend that (describe)]*.

Authority: *Federal Civil Jury Instructions of the Seventh Circuit*, Appendix, "Claims and Defenses" (2015) (modified to add first paragraph about prior proceedings and to bring second paragraph into conformity with prior proceedings).

**II. DEFENDANTS' ADDITIONAL PROPOSED IN-TRIAL INSTRUCTIONS**

**ADDITIONAL PROPOSED INSTRUCTION NO. 2  
(Evidence Admitted Only Against One Party)**

Some of the evidence in this case is limited to one of the parties, and cannot be considered against the others. Each party is entitled to have the case decided solely on the evidence which applies to that party.

The evidence you [are about to hear] [just heard] can be considered only in the case against [*name party*].

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 2.3 (2015).

**III. DEFENDANTS' ADDITIONAL PROPOSED END-OF-TRIAL INSTRUCTIONS**

**A. GENERAL INSTRUCTIONS**

**ADDITIONAL PROPOSED INSTRUCTION NO. 3  
(All Litigants Equal Before the Law)**

In this case, some of the parties are corporations. All parties are equal before the law. A corporation is entitled to the same fair consideration that you would give any individual person.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 1.03 (2015).



**ADDITIONAL PROPOSED INSTRUCTION NO. 4**  
**(Evidence)**

The evidence consists of the testimony of the witnesses, the exhibits admitted in evidence, and stipulations.

[During the trial, certain testimony was presented to you by the reading of a deposition and video. You should give this testimony the same consideration you would give it had the witness appeared and testified here in court.]

A stipulation is an agreement between both sides that certain facts are true. If the parties have stipulated to a fact, you must accept that fact as proved.

[I have taken judicial notice of certain facts. You must also accept those facts as proved.]

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* §§ 1.04, 1.05 (2015) (modified to add sentence that stipulated facts must be accepted as proved); Filed Jury Instructions (Given), *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG (2009) (modified to add potential paragraph about judicial notice).

**ADDITIONAL PROPOSED INSTRUCTION NO. 5**  
**(Evidence Limited to Certain Parties)**

Each party is entitled to have the case decided solely on the evidence that applies to that party.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 1.10 (2015).

**ADDITIONAL PROPOSED INSTRUCTION NO. 6**  
**(Prior Inconsistent Statements or Acts)**

You may consider the statements given by any party or witness who testified under oath before trial as evidence of the truth of what he or she said in the earlier statements, as well as in deciding what weight to give his or her testimony.

With respect to other witnesses, the law is different. If you decide that, before the trial, one of these witnesses made a statement not under oath or acted in a manner that is inconsistent with his or her testimony here in court, you may consider the earlier statement or conduct only in deciding whether his or her testimony here in court was true and what weight to give to his or her testimony here in court.

In considering a prior inconsistent statement or conduct, you should consider whether it was simply an innocent error or an intentional falsehood and whether it concerns an important fact or an unimportant detail.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 1.14 (2015) (modified to include both genders).

**B. LIABILITY INSTRUCTIONS**

**ADDITIONAL PROPOSED INSTRUCTION NO. 7  
(Multiple Defendants)**

You must give separate consideration to each claim and each party in this case. Although there are four defendants, it does not follow that if one is liable, the others are also liable.

*[If evidence was admitted only as to fewer than all defendants or all claims:]* In considering a claim against a defendant, you must not consider evidence admitted only against other defendants [or only as to other claims].

Authority: *Federal Civil Jury Instructions of the Seventh Circuit* § 1.25 (2015) (modified to accommodate entity liability).

**ADDITIONAL PROPOSED INSTRUCTION NO. 8**  
**(Section 10(b) Elements Generally)**

Plaintiffs contend that Defendants Household, William Aldinger, David Schoenholz, and Gary Gilmer violated Section 10(b) of the Securities Exchange Act and the SEC's Rule 10b-5. I will use "Section 10(b)" to refer to both the Section and the Rule. Plaintiffs contend that defendants violated Section 10(b) by making 17 misstatements or omissions; I will refer to these as the "17 Statements."

As I previously instructed you, some elements of plaintiffs' claims have been resolved by prior proceedings and stipulations and some elements remain to be determined by you. I will now instruct you about the elements of plaintiffs' claims that remain for you to determine.

To prevail on their Section 10(b) claim as to any of the defendants' 17 Statements, plaintiffs must prove by a preponderance of the evidence as to that Statement:

- (1) that the defendants' misstatement or omission caused plaintiffs economic loss; and
- (2) the amount of per share damages, if any, that resulted from that Statement.

Authority: Filed Jury Instructions (Given), *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG at 25 (2009) (modified); *see also Fifth Circuit Pattern Jury Instructions (Civil Cases)* § 7.1 (2014); *Glickenhau & Co. v. Household International, Inc.*, 787 F.3d 408, 414 (7th Cir. 2015); *Ray v. Citigroup Global Markets, Inc.*, 482 F.3d 991, 994-995 (7th Cir. 2007); *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336, 341 (2005).

**ADDITIONAL PROPOSED INSTRUCTION NO. 9**  
**(Loss Causation)**

To prove the first element of their Section 10(b) claim as to any of the 17 Statements, plaintiffs must prove that the particular misstatement or omission caused plaintiffs to suffer economic loss. Plaintiffs must prove a direct causal connection between the particular misstatement or omission and plaintiffs' loss. In order to prove causation, plaintiffs must isolate the extent to which a decline in the stock price is due to fraud-related corrective disclosures and not other factors. Plaintiffs do not have to prove that a misstatement or omission was the sole cause of plaintiffs' loss, but plaintiffs must prove that the misstatement or omission was a substantial or significant cause. Ask yourself: If the defendants had not engaged in this misstatement or omission, would this loss have occurred?

To establish that a particular misstatement or omission caused them loss, plaintiffs must prove two things: (1) that the misstatement or omission caused Household's stock price to be higher than it would have been without the misstatement or omission; and (2) that when the truth was revealed about that misstatement or omission, the revelation caused Household's stock price to decrease.

It is not enough for plaintiffs to prove that they purchased Household stock at a price that was inflated as a result of defendants' misstatement or omission and then lost money when they sold the stock at a lower price. Many factors other than a misstatement or omission may cause a stock price to decrease. If you find that plaintiffs would have suffered the same loss on their investments regardless of defendants' particular misstatement or omission, you must find in favor of defendants.

Authority: Filed Jury Instructions (Given), *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG at 32 (2009) (modified); *see also Eleventh Circuit Civil Pattern Jury Instructions* § 6.2 (2013); *Glickenhause & Co. v. Household International, Inc.*, 787 F.3d 408, 415 (7th Cir. 2015) (“To prove [loss causation], plaintiffs had the burden to establish that the price of the securities they purchased was ‘inflated’—that is, it was higher than it would have been without the false statements—and that it declined once the truth was revealed.”); *id.* at 421 (“So in order to prove loss causation, plaintiffs in securities-fraud cases need to isolate the extent to which a decline in stock price is due to fraud-related corrective disclosures and not other factors.”); *Ray v. Citigroup Global Markets, Inc.*, 482 F.3d 991, 995 (7th Cir. 2007); *Erica P. John Fund, Inc. v. Halliburton Co.*, 131 S. Ct. 2179, 2186 (2011) (holding that if an “intervening cause[]” “were responsible for the loss or part of it, a plaintiff would not be able to prove loss causation to that extent”); *Dura Pharmaceuticals, Inc. v. Broudo*, 544 U.S. 336, 342 (2005); Final Jury Instructions, *In re JDS Uniphase Corp. Securities Litigation*, No. 02-cv-1486 at 13-14 (N.D. Cal. 2007).

**ADDITIONAL PROPOSED INSTRUCTION NO. 10**  
**(Damages, i.e., Inflation)**

If you find that plaintiffs have not proved loss causation as to any of the 17 Statements, then you should not consider the question of damages for that Statement.

If you find that plaintiffs have proved loss causation as to any of the 17 Statements, then you must determine the amount of per share damages, if any, that plaintiffs have proven resulted from that particular Statement. Plaintiffs can recover only actual damages, which is the difference between the price plaintiffs paid for each share of Household stock and the price each share would have cost if no misstatement or omission had occurred, in other words, the measure of inflation in the stock price. Any damages you award must have a reasonable basis in the evidence and may not be based on speculation or guesswork. Damages need not be proven with mathematical certainty but there must be enough evidence for you to make a reasonable estimate of damages. Plaintiffs have the burden of proving damages by a preponderance of the evidence.

Authority: Filed Jury Instructions (Given), *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG at 34 (2009) (modified to reflect plaintiff's burden); *Federal Civil Jury Instructions of the Seventh Circuit* § 1.31 (2015); *Model Civil Jury Instructions for the Ninth Circuit* § 18.8 (2016); *Glickenhau & Co. v. Household International, Inc.*, 787 F.3d 408, 414 (7th Cir. 2015).



**ADDITIONAL PROPOSED INSTRUCTION NO. 11**  
**(Allocation of Responsibility)**

If you find plaintiffs are entitled to an award of damages for any of the 17 Statements, you must determine the percentage of responsibility, if any, of each of the four defendants for the loss incurred by plaintiffs. In determining the percentage of responsibility of each defendant, you should consider the nature of the conduct of each defendant and the nature and extent of the causal relationship between the conduct of that defendant and the damages incurred by plaintiffs.

**Authority:** Verdict Form, *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG at 42 (2009); 15 U.S.C. § 78u-4(f)(3)(C); 3B O'Malley, Grenig & Lee, *Federal Jury Practice and Instructions—Civil* § 162:335 (6<sup>th</sup> ed. 2011) (modified); 4 Sand, et al., *Modern Federal Jury Instructions – Civil*, Instr. 82-12 (2008).

**C. CONCLUDING INSTRUCTIONS**

**ADDITIONAL PROPOSED INSTRUCTION NO. 12  
(Selection of Foreperson; Verdict Form)**

Upon retiring to the jury room, you must select a presiding juror. The presiding juror will preside over your deliberations and will be your representative here in court.

Forms of verdict have been prepared for you. [*Forms of verdict read.*]

Take these forms to the jury room, and when you have reached unanimous agreement on every question in the verdict, your presiding juror will fill in and date the appropriate form, and all of you will sign it.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 1.32 (2015) (modified to add “every question in” to the third paragraph).

**ADDITIONAL PROPOSED INSTRUCTION NO. 13**  
**(Disagreement among Jurors)**

The verdict must represent the considered judgment of each juror. Your verdict must be unanimous on each question.

You should make every reasonable effort to reach a verdict. In doing so, you should consult with one another, express your own views, and listen to the opinions of your fellow jurors. Discuss your differences with an open mind. Do not hesitate to reexamine your own views and change your opinion if you come to believe it is wrong. But you should not surrender your honest beliefs about the weight or effect of evidence solely because of the opinions of other jurors or for the purpose of returning a unanimous verdict.

All of you should give fair and equal consideration to all the evidence and deliberate with the goal of reaching an agreement that is consistent with the individual judgment of each juror. You are impartial judges of the facts.

Authority:     *Federal Civil Jury Instructions of the Seventh Circuit* § 1.34 (2015) (modified second sentence to clarify unanimity is required for each question).

Respectfully submitted,

DATED: 4/22/2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' ADDITIONAL PROPOSED JURY  
INSTRUCTIONS**

[Exhibit H-7 to [Proposed] Final Pretrial Order]

**I. DEFENDANTS' PROPOSED PRETRIAL INSTRUCTIONS**

Proposed Instruction No. 1 (Claims, Defenses, and Prior Proceedings):

Plaintiffs object to defendants' proposed instruction. The Court should provide the jury with a summary of the evidence from the first trial. Plaintiffs have prepared a Statement of the Prior Proceedings which should be read and given to the jurors in lieu of defendants' proposed instruction. *See* Proposed Statement of the Prior Proceedings to be Read and Given to the Jury (Exhibit B-3 to [Proposed] Final Pretrial Order); *see also* Plaintiffs' Memorandum in Support of Motion *In-Limine* to Permit Plaintiffs to Present Evidence of the Fraud [Motion *in Limine* No. 1].

**II. DEFENDANTS' PROPOSED IN-TRIAL INSTRUCTIONS**

Proposed Instruction No. 2 (Evidence Admitted Only Against One Party):

Plaintiffs object to defendants' proposed instruction. It is inapplicable to the issues that must be decided at the retrial. Defendants have not pointed to any evidence that should be admitted as to only one of the four defendants. The evidence regarding loss causation, damages and proportionate liability should be considered as to all four defendants.

**III. DEFENDANTS' END OF TRIAL INSTRUCTIONS**

Proposed Instruction No. 3 (All Litigants Equal Before the Law):

Plaintiffs object to defendants' proposed instruction. The instruction states that "some of the parties are corporations." Of the relevant actors at the retrial, only defendant Household is a corporation. Plaintiffs ask that the Court use Plaintiffs' Proposed Jury Instruction No. 16 (All Litigants Equal Before the Law), which makes this distinction, in lieu of defendants' instruction.

Proposed Instruction No. 4 (Evidence):

Plaintiffs object to this instruction. Defendants' instruction ignores the fact that the evidence will also consist of testimony from the first trial, which will have to be read to the jury. Plaintiffs request that the Court use Plaintiffs' Proposed Jury Instruction Nos. 17 (Evidence) and 18 (Deposition Testimony and Trial Testimony) in lieu of defendants' proposed instruction, which omits any reference to testimony from the first trial.

Proposed Instruction No. 5 (Evidence Limited to Certain Parties):

Plaintiffs object to defendants' proposed instruction. Again, defendants' instruction implies or assumes that there is evidence that will apply only to certain defendants. The evidence regarding loss causation, damages and proportionate liability should be considered as to all four defendants. Therefore, defendants' instruction is unnecessary and confusing.

Proposed Instruction No. 6 (Prior Inconsistent Statements or Acts):

Plaintiffs object to defendants' proposed instruction. Defendants have modified the Seventh Circuit Model Instruction No. 1.14 by removing brackets around the words "[Party]" and "[witness under oath]" in their proposed instruction. In removing these brackets, defendants have blurred the distinction between prior inconsistent statements by a party and prior inconsistent statements by a third party witness. Any prior inconsistent statement by a party is an admission that is received as substantive evidence. *See* Fed. R. Evid. 801(d)(2)(A)-(E). A party's prior inconsistent statement, unlike statements by third parties, need not be made under oath to qualify as substantive evidence. *See United States v. Disantis*, 565 F.3d 354, 360 (7th Cir. 2009) (explaining that prior inconsistent statements of non-party witnesses "are admissible as non-hearsay, substantive evidence only if 'subject to cross-examination' and 'given under oath'" whereas statements of a party opponent "are admissible as substantive evidence even if not given under oath"). The Court should use Plaintiffs' Proposed Jury Instruction No. 29 in lieu of defendants' instruction and modify it, as necessary, at the conclusion of the trial to address prior statements by particular parties or third parties.

Proposed Instruction No. 7 (Multiple Defendants):

Plaintiffs object to defendants' proposed instruction. First, defendants' use of the word "liable" is confusing in light of the prior jury's finding, as affirmed by the Court of Appeals, that defendants knowingly or recklessly made 17 materially false and misleading statements. Second, plaintiffs again object to defendants' assumption that there will be evidence admitted against only some subset of the defendants. Evidence related to loss causation, damages and proportionate liability will be admissible as to all four defendants.



Proposed Instruction No. 8 (Section 10(b) Elements Generally):

Plaintiffs object to defendants' proposed instruction. The jury should be instructed with respect to Rule 10b-5 and each of its elements. The Court should also instruct the jury as to the elements which have already been proven. Plaintiffs request that the Court use Plaintiffs' Proposed Jury Instruction Nos. 41 (Rule 10b-5 Defined) and 42 (Elements for Primary Liability Under Section 10(b)) in lieu of defendants' proposed instruction.

Proposed Instruction No. 9 (Loss Causation):

Defendants' proposed jury instruction on loss causation is objectionable on numerous grounds. To begin, plaintiffs object to the first sentence in paragraph one, as it improperly refers to loss causation as the "first element" plaintiffs must prove to prevail on their §10(b) claim. This is inaccurate, misleading and inconsistent with the Seventh Circuit's opinion in this case, which specifically enumerates all of the elements plaintiffs must prove to prevail under §10(b) and Rule 10b-5. *See Glickenhau & Co. v. Household Int'l, Inc.*, 787 F.3d 408, 414 (7th Cir. 2015) (listing loss causation as the sixth and final element plaintiffs must prove to prevail under Rule 10b-5); *Dura Pharms., Inc. v. Broudo*, 544 U.S. 336, 341-42 (2005) (same). By describing loss causation as the "first element" plaintiffs must prove, the jury may give less weight to the other five elements, including those plaintiffs have already conclusively proven. Additionally, as set forth in plaintiffs' proposed jury instructions, plaintiffs believe that the jury should be instructed on all elements plaintiffs must prove (and have proved) under Rule 10b-5.

Plaintiffs object to the second sentence in the first paragraph of defendants' proposed jury instruction, which states that plaintiff must prove a "direct causal connection between the particular misstatement or omission and plaintiffs' loss." As defendants concede, plaintiffs need only prove that the misstatement or omission was a substantial or significant cause of plaintiffs' loss, not that it was the sole cause. By using the language "direct causal connection," defendants' attempt to raise the bar on what plaintiffs are required to prove by improperly implying that the misstatement or omission must be *the* cause of plaintiffs' loss.

Plaintiffs object to the third sentence in the first paragraph of defendants' proposed jury instruction as it ignores that expert testimony is commonly used to isolate the economic losses caused by the fraud and omits the Seventh Circuit's finding that "Fischel's models controlled for market and industry factors and general trends in the economy – the regression analysis took care of that." *Glickenhau*s, 787 F.3d at 421; *see id.* at 422 (rejecting argument that the leakage model must *itself* account for, and perfectly exclude, any firm-specific, non-fraud related factors).

Plaintiffs object to the fourth sentence in the first paragraph of defendants' proposed jury instruction, as defendants' addition of the word "significant" is redundant. Plaintiffs object to the last sentence in the first paragraph on the grounds that it presents the jury with a misleading and unnecessary hypothetical.

Plaintiffs object to the second point in paragraph two, "that when the truth was revealed about that misstatement or omission, the revelation caused Household's stock price to decrease." This language implies that the truth must be revealed in a single revelation or corrective disclosure and is contrary to Seventh Circuit and Supreme Court precedent which "generally recognize[s] that the truth can leak out over time." *Glickenhau*s, 787 F.3d at 422 (citing cases); *id.* at 416 (observing that "information contained in a major disclosure event often leaks out to some market participants before its release"). As the court instructed the jury at the last trial – an instruction defendants did not challenge on appeal – and as plaintiffs' proposed instruction states, the truth may be revealed to the market through a single disclosure or series of disclosures made by any person or entity.

Plaintiffs object to the last paragraph of defendants' proposed jury instruction in its entirety as it is completely unnecessary and would likely confuse the jury. The first sentence of defendants' final paragraph indicates that plaintiffs must, among other things, prove that they "lost money when they sold the stock at a lower price." This statement is untrue. Plaintiffs need not sell their stock at all, let alone at a lower price, to suffer damages in a securities case. *Ong v. Sears, Roebuck & Co.*, No. 03 C 4142, 2006 U.S. Dist. LEXIS 73801, at \*41-\*46 (N.D. Ill. Sept. 27, 2006). The Seventh Circuit found that "Fischel's models controlled for market and industry factors and general trends in the economy" because "the regression analysis took care of that." *Glickenhau*s, 787 F.3d at 421. In

light of the Seventh Circuit's ruling, the only other "factors" that may have caused Household's stock price to decrease are firm-specific, non-fraud related factors. But defendants have failed to identify any significant firm-specific, non-fraud factors that could have affected Household's stock price. *See* February 1, 2016 Order at 22. The statement that "[m]any factors other than a misstatement or omission may cause a stock price to decrease" is plainly wrong in light of these holdings. The last sentence improperly inverts what plaintiffs must prove to establish the element of loss causation. The entire paragraph should be stricken.

Plaintiffs propose that their [Proposed] Jury Instruction No. 43 be given. Plaintiffs' proposed instruction is consistent with the loss causation instruction given at the last trial, an instruction defendants did not challenge on appeal. *See also* Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Object to Defendants' Proposed Verdict Form, Including Their "Question One" and Their Attempt to Add "Defendants' Specific Disclosures Model" as an Option for the Jury to Select in Determining Damages [Motion *in Limine* No. 5].

Proposed Instruction No. 10 (Damages, i.e., Inflation):

Plaintiffs object to defendants' proposed jury instruction. Defendants' proposed instruction is a modified version of the instruction on damages given at the last trial, which defendants did not challenge on appeal. *See* Jury Instructions as Given at First Trial (Dkt. No. 1614), at 34. Plaintiffs object to the first two sentences of defendants' proposed instruction as confusing and misleading. Specifically, defendants' instruction suggests that the jury must make 17 separate determinations of whether defendants' fraud caused plaintiffs' losses under §10(b), when the jury need only make a single determination: whether plaintiffs have proved defendants' fraud caused their losses. *See Glickenhauser*, 787 F.3d at 415 (confirming that loss causation can be proven by showing that "the price of the securities [plaintiffs] purchased was 'inflated' . . . and that it declined since the truth was revealed"). Defendants' proposed instruction also improperly puts the focus on the 17 statements, rather than on the disclosures plaintiffs claim revealed the truth and their impact on Household's stock price, contrary to the Seventh Circuit's findings. *Id.* ("The best way to determine the impact of a false statement is to observe what happens when the truth is finally disclosed and use that to work

backward . . .”). Once the jury determines that the stock price declines during the disclosure period were substantially caused by the removal of fraud-related inflation, plaintiffs will have proven loss causation. The jury will then be asked to estimate plaintiffs’ damages using the model it believes most accurately estimates the fraud-related information in Household’s share price for each day during the Class Period. Requiring the jury to parse loss causation on a statement-by-statement basis is both unnecessary and inconsistent with the Seventh Circuit’s findings. *See Glickenhau*, 787 F.3d at 417-18 (“As soon as the first false statement was made, that overpricing became fully attributable to the false statement . . . every subsequent false statement caused the full amount of inflation to remain in the stock price . . . because had the truth become known, the price would have fallen then.”). Plaintiffs object to defendants’ unnecessary addition of the phrase “and may not be based on speculation or guesswork” in the third sentence of the second paragraph. Plaintiffs object to the last sentence in defendants’ proposed instruction, as defendants attempt to reinstruct the jurors on plaintiffs’ burden of proof, which has already been addressed in a separate instruction. Plaintiffs ask the Court to use Plaintiffs’ Proposed Jury Instruction No. 44 (Damages) in lieu of defendants’ proposed instruction.

Proposed Instruction No. 11 (Allocation of Responsibility):

Plaintiffs object to defendants’ instruction. In the first sentence, defendants again advance their flawed argument that damages are determined on a statement-by-statement basis. *See* Plaintiffs’ Objections to Defendants’ Proposed Instruction No. 34, *supra*. Plaintiffs also object to the first sentence of defendants’ instruction which includes the words “if any.” Defendants’ instruction is confusing. If the jury finds loss causation and determines the daily per share damages, the jury will have to determine the percentage of responsibility for all four defendants, even if the allocation for one of the defendants is “zero.” Plaintiffs ask the Court to use Plaintiffs’ Proposed Jury Instruction No. 45 (Section 10(b) – Apportionment of Responsibility) in lieu of defendants’ instruction.

Proposed Instruction No. 12 (Selection of Foreperson; Verdict Form):

Plaintiffs object to this instruction. Defendants' proposed instruction improperly modifies Seventh Circuit Model Instruction No. 1.32 to add the phrase "every question in." Defendants undoubtedly made this modification because of their flawed proposed verdict form. Plaintiffs have objected to both defendants' Verdict Form and their proposal that the jury make 17 separate determinations with respect to loss causation. *See* Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Object to Defendants' Proposed Verdict Form, Including Their "Question One" and Their Attempt to Add "Defendants' Specific Disclosures Model" as an Option for the Jury to Select in Determining Damages [Motion *in Limine* No. 5]; Plaintiffs' Objections to Defendants' Proposed Jury Instruction Nos. 34 and 35. Therefore, plaintiffs ask the Court to use Plaintiffs' Proposed Jury Instruction No. 47 (Duty to Deliberate), which faithfully tracks the Seventh Circuit Model Instruction.

Proposed Instruction No. 13 (Disagreement Among Jurors):

Plaintiffs object to this instruction. Again, defendants have modified the Seventh Circuit Model Instructions by adding the phrase "on each question," among other changes. Defendants' instruction is again designed to reflect defendants' flawed proposed verdict form. *See* Plaintiffs' Objections to Proposed Instruction Nos. 34, 35 and 36 (Selection of Foreperson; Verdict Form), *supra*. Plaintiffs ask the Court to use Plaintiffs' Proposed Jury Instruction No. 49 (Disagreement Among Jurors) in lieu of defendants' instruction. Plaintiffs' proposed instruction tracks the language of the Seventh Circuit Model Instructions.

Defendant Gilmer's Proposed Instruction No. 35 (Allocation of Responsibility):

Plaintiffs object to this instruction. The instruction is not in accordance with the law. The proper language of the statute (15 U.S.C. §78u-4(f)(3)(C)) is set forth below:

In determining the percentage of responsibility under this paragraph, the trier of fact shall consider:

(1) the nature of the conduct of each covered person found to have caused or contributed to the loss incurred by the plaintiff . . . and

(2) the nature and extent of the causal relationship between the conduct of each such person and the damages incurred by the plaintiff . . .

Gilmer has added “the nature of the statements made by each person found to have caused or contributed to plaintiffs loss” and the “issues misrepresented by the statements of each person” which is nowhere to be found in the statute and is improper. Gilmer’s proposed instruction is also improper because it suggests that damages in this case will be determined on a statement-by-statement basis. *See* Plaintiffs’ Objections to Defendants’ Proposed Instruction No. 34. Plaintiffs also object to Gilmer’s insertion of the words “if any.” Gilmer’s instruction is confusing. If the jury finds loss causation and determines the daily per share damages, the jury will have to determine the percentage of responsibility for all four defendants, even if the allocation for one of the defendants is “zero.” Plaintiffs ask the Court to use Plaintiffs’ Proposed Jury Instruction No. 45 (Section 10(b) – Apportionment of Responsibility) in lieu of defendant Gilmer’s instruction.

DATED: April 22, 2016

Respectfully submitted,

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

### **DEFENDANTS' PROPOSED VERDICT FORM**

**[Exhibit H-8 to [Proposed] Final Pretrial Order]**



**1. Question No. 1:**

Have plaintiffs proven that defendants' misstatements or omissions caused plaintiffs economic loss? Indicate "yes" or "no" for each misstatement or omission below:

Statement 1 (March 23, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 2 (March 28, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 3 (April 18, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 4 (May 9, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 5 (July 18, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 6 (August 10, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 7 (October 17, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 8 (November 14, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 9 (December 4, 2001)

Yes \_\_\_\_ No \_\_\_\_

Statement 10 (January 16, 2002)

Yes \_\_\_\_ No \_\_\_\_

Statement 11 (March 13, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 12 (April 9, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 13 (April 17, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 14 (May 10, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 15 (July 17, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 16 (August 14, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 17 (August 14, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered "No" as to every Statement, then you have finished with the Verdict Form. Please turn to the last page, sign and date the Verdict Form, and inform the Court that you have finished.*

*If you answered "Yes" as to any Statement, then proceed to Question No. 2.*

**2. Question No. 2:**

Determine which, if any, proposed model reasonably estimates plaintiffs' damages resulting from each of the Statements for which you answered "Yes" in Question 1:

\_\_\_\_\_ Plaintiffs' Specific Disclosures Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Plaintiffs' Leakage Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Defendants' Specific Disclosures Model (Defendants' Ex. \_\_\_\_)

\_\_\_\_\_ None of the proposed damages models

*If you determined that none of the proposed damages models reasonably estimate plaintiffs' damages resulting from each of the Statements for which you answered "Yes" in Question 1, then you have finished with the Verdict Form. Please turn to the last page, sign and date the Verdict Form, and inform the Court that you have finished.*

*Otherwise, write the amount of inflation per share, if any, that you find the Statements for which you answered "Yes" in Question 1 caused on each of the dates set forth in Table A. If no loss was caused by those Statements on any date, write "none" or "0." Then proceed to Question No. 3.*

**3. Question No. 3:**

What percentage of responsibility, if any, for any loss plaintiffs incurred as a result of the Statements as to which you answered "Yes" in Question 1 is due to the conduct of defendants Household, Williams Aldinger, David Schoenholz, and Gary Gilmer, respectively? In making this determination, you should consider the nature of the conduct of each person found to have caused or contributed to plaintiffs' loss and the nature and extent of the causal relationship between each such person's conduct and plaintiffs' loss.

\_\_\_\_\_ Household

\_\_\_\_\_ William Aldinger

\_\_\_\_\_ David Schoenholz

\_\_\_\_\_ Gary Gilmer

Respectfully submitted,

DATED: 4/22/2016

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**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)  
Situating, )  
 )  
Plaintiff, ) CLASS ACTION  
 )  
vs. ) Honorable Jorge L. Alonso  
 )  
 )  
HOUSEHOLD INTERNATIONAL, INC., et )  
al., )  
 )  
Defendants. )  
 )

**PLAINTIFFS' OBJECTIONS TO DEFENDANTS' [PROPOSED] VERDICT FORM**

**[Exhibit H-9 to [Proposed] Final Pretrial Order]**

Plaintiffs object to the verdict form submitted by defendants Household, Aldinger and Schoenholz for the reasons set forth in Plaintiffs' Motion *in Limine* No. 5, incorporated herein. Plaintiffs also object to the verdict form proposed by defendant Gilmer as set forth below.

Question No. 1 in Gilmer's proposed verdict form is similar to Question No. 1 in the verdict form proposed by the other defendants. Therefore, as to Gilmer's proposed Question No. 1, plaintiffs incorporate their objections to Question No. 1, as proposed by the other defendants. *See* Motion *in Limine* No. 5.

For Gilmer's Question No. 2 in his proposed verdict form, plaintiffs object to the inclusion of the language "resulting from that statement in light of the issue or issues misrepresented in that statement." This added language is unnecessary, will mislead the jury and is objectionable for the reasons set forth in Plaintiffs' Motion *in Limine* No. 5. Plaintiffs also object to asking the jury to select the model that reasonably estimates damages twice. In addition, plaintiffs object to the inclusion of defendants' Specific Disclosure Model for the reasons set forth in Plaintiffs' Motion *in Limine* No. 5 with respect to the verdict form proposed by the other defendants.

Plaintiffs also object to Gilmer's proposed Question No. 3 regarding the allocation of responsibility among defendants. As proposed, the question misstates the law. The language of the statute (15 U.S.C. §78u-4(f)(3)(C)) is set forth below:

In determining the percentage of responsibility under this paragraph, the trier of fact shall consider:

(1) the nature of the conduct of each covered person found to have caused or contributed to the loss incurred by the plaintiff . . . and

(2) the nature and extent of the causal relationship between the conduct of each such person and the damages incurred by the plaintiff . . .

Gilmer has added "the nature of the statements made by each person found to have caused or contributed to plaintiffs loss" and the "issues misrepresented by the statements of each person." Gilmer's language is nowhere to be found in the statute and is improper.

Plaintiffs also object to all defendants' inclusion of the words "if any" in Question No. 3 as confusing and improper. If the jury finds loss causation and determines the daily per share damages,

the jury will have to determine the percentage of responsibility for all four defendants, even if the allocation for one of the defendants is “zero.”

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

LAWRENCE E. JAFFE PENSION PLAN, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

v.

HOUSEHOLD INTERNATIONAL, INC., *et*  
*al.*,

Defendants.

Case No.: 1:02-cv-05893

Hon. Jorge L. Alonso

**DEFENDANTS GARY GILMER'S PROPOSED JURY INSTRUCTION AND VERDICT  
FORM**

**[Exhibit H-10 to [Proposed] Final Pretrial Order]**

**PRELIMINARY STATEMENT**

Pursuant to Local Rule 16.1.1, Defendant Gary Gilmer submits the following proposed jury instructions, in addition to the proposed Jury Instructions previously submitted jointly by all Defendants. Defendant Gilmer reserves the right to submit amended or supplemental proposed instructions, as necessary, based on the contents of any opinions or rulings issued by the Court, our review of Plaintiffs' proposed instructions, the outcome of various pending and anticipated motions, any rulings the Court may render in charging conferences or during the course of the trial, or the evidence adduced at trial.

**DEFENDANT GILMER'S MODIFIED PROPOSED INSTRUCTION NO. 35**  
**(Allocation of Responsibility)**

If you find plaintiffs are entitled to an award of damages for any of the 17 Statements, then you must separately determine for each defendant the percentage of responsibility, if any, of that defendant for the loss incurred by plaintiffs. In determining the percentage of responsibility of each defendant, you should consider the nature of the statement or statements made by that defendant, the issues misrepresented by the statements made by that defendant, and the nature and extent of the causal relationship between the statement or statements made by that defendant and the damages incurred by plaintiffs.

**Authority:** Verdict Form, *Jaffe v. Household International, Inc.*, No. 02-cv-5893-RAG at 42 (2009) (modified); 15 U.S.C. § 78u-4(f)(3)(C); 3B O'Malley, Grenig & Lee, *Federal Jury Practice and Instructions—Civil* § 162:335 (6<sup>th</sup> ed. 2011) (modified); 4 Sand, et al., *Modern Federal Jury Instructions – Civil*, Instr. 82-12 (2008).

**DEFENDANT GILMER'S MODIFIED PROPOSED VERDICT FORM**

**1. Question No. 1:**

Have plaintiffs proven that one or more of defendants' misstatements or omissions caused plaintiffs economic loss? Indicate "yes" or "no" for each misstatement or omission below:

Statement 1 (March 23, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 2 (March 28, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 3 (April 18, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 4 (May 9, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 5 (July 18, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 6 (August 10, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 7 (October 17, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 8 (November 14, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 9 (December 4, 2001)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 10 (January 16, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 11 (March 13, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 12 (April 9, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 13 (April 17, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 14 (May 10, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 15 (July 17, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 16 (August 14, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

Statement 17 (August 14, 2002)

Yes \_\_\_\_\_ No \_\_\_\_\_

*If you answered “No” as to every Statement, then you have finished with the Verdict Form. Please turn to the last page, sign and date the Verdict Form, and inform the Court that you have finished.*

*If you answered “Yes” as to any Statement, then proceed to Question No. 2.*

**2. Question No. 2:**

For each statement as to which you answered “Yes” in Question 1, determine which, if any, proposed model reasonably estimates plaintiffs’ damages resulting from that Statement, in light of the issue or issues misrepresented in that statement:

Statement No. 1

\_\_\_\_\_ Plaintiffs' Specific Disclosures Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Plaintiffs' Leakage Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Defendants' Specific Disclosures Model (Defendants' Ex. \_\_\_\_)

\_\_\_\_\_ None of the proposed damages models reasonably estimates the damages related to the issue misrepresented in that statement

Statements No. 2 through 17

\_\_\_\_\_ Plaintiffs' Specific Disclosures Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Plaintiffs' Leakage Model (Plaintiffs' Ex. \_\_\_\_)

\_\_\_\_\_ Defendants' Specific Disclosures Model (Defendants' Ex. \_\_\_\_)

\_\_\_\_\_ None of the proposed damages models reasonably estimates the damages related to the issue or issues misrepresented by each statement.

*If you determined that none of the proposed damages models reasonably estimate plaintiffs' damages resulting from each of the Statements for which you answered "Yes" in Question 1, then you have finished with the Verdict Form. Please turn to the last page, sign and date the Verdict Form, and inform the Court that you have finished.*

*Otherwise, write the amount of inflation per share, if any, that you find the Statements for which you answered "Yes" in Question 1 caused on each of the dates set forth in Table A. If no loss was caused by those Statements on any date, write "none" or "0." Then proceed to Question No. 3.*

**3. Question No. 3:**

What percentage of responsibility, if any do you allocate to each of the defendants listed below for the loss plaintiffs incurred as a result of the Statement or Statements made by that defendant and as to which you answered "Yes" in Question 1? In making this determination, you should consider the nature of the statements made by each person found to have caused or contributed to plaintiffs' loss, the issues misrepresented by the statements of each person found to have caused or contributed to plaintiffs' loss, and the nature and extent of the causal relationship between each such person's statement or statements and plaintiffs' loss.

\_\_\_\_\_ Household

\_\_\_\_\_ William Aldinger

\_\_\_\_\_ David Schoenholz

\_\_\_\_\_ Gary Gilmer

Respectfully submitted,

DATED: 4/22/2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**LIST OF PLAINTIFFS' MOTIONS *IN LIMINE***

**[Exhibit J-1 to [Proposed] Final Pretrial Order]**

Pursuant to the Court's Order dated February 9, 2016, plaintiffs are filing concurrently herewith the following Motions *In Limine*:

- |                               |  |
|-------------------------------|--|
| Motion <i>in Limine</i> No. 1 | Plaintiffs' Motion <i>in Limine</i> to Permit Plaintiffs to Present Evidence of the Fraud  |
| Motion <i>in Limine</i> No. 2 | Plaintiffs' Motion <i>in Limine</i> to (1) Preclude Defendants from Relitigating Falsity, Materiality, Scienter and Reliance; (2) Deem the Findings from the Prior Proceedings Uncontested; and (3) Preclude Reference to Dismissed Statements   |
| Motion <i>in Limine</i> No. 3 | Plaintiffs' Motion <i>in Limine</i> to Request that the Court Apply Evidentiary Rulings from the First Trial to the Retrial  |
| Motion <i>in Limine</i> No. 4 | Plaintiffs' Motion <i>in Limine</i> to Bar (1) Testimony or Evidence Concerning Allegedly Company-Specific Non-Fraud Information that Purportedly Distorted Professor Fischel's Leakage and Specific Disclosures Models; (2) Testimony or Argument that Fischel's Leakage Model Is Not a Valid Method for Quantifying Artificial Inflation; (3) Use of Materials by Defendants' Experts that Are Not Cited in the Experts' Reports, and (4) Cumulative Testimony |
| Motion <i>in Limine</i> No. 5 | Plaintiffs' Motion <i>in Limine</i> to Object to Defendants' Proposed Verdict Form, Including Their "Question One" and Their Attempt to Add "Defendants' Specific Disclosures Model" as an Option for the Jury to Select in Determining Damages  |
| Motion <i>in Limine</i> No. 6 | Plaintiffs' Motion <i>in Limine</i> to Preclude Fact Witnesses from Offering Impermissible Opinion Testimony   |
| Motion <i>in Limine</i> No. 7 | Plaintiffs' Motion <i>in Limine</i> to Preclude Defendants from Calling the Lead Plaintiff or Introducing Class Members' Trading Records and Related Information at Trial  |
| Motion <i>in Limine</i> No. 8 | Plaintiffs' Motion <i>in Limine</i> to Bar Evidence of or Reference to Aggregate Damages to the Class  |
| Motion <i>in Limine</i> No. 9 | Plaintiffs' Motion <i>in Limine</i> to Permit Plaintiffs to Offer Certain Prior Trial Testimony of Dr. Mukesh Bajaj  |



DATED: April 22, 2016

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NORTHERN DISTRICT OF ILLINOIS  
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LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**DEFENDANTS' MOTIONS *IN LIMINE***

**[Exhibit J-2 to [Proposed] Final Pretrial Order]**

Pursuant to the Court's Order dated February 9, 2016, Defendants are filing concurrently herewith the following Motions *In Limine*:

- Motion *In Limine* No. 1: The Court should exclude evidence not relevant to causation or inflation, including evidence related to Andrew Kahr; an unapproved "training" video; the stock transactions of the individual defendants; Household's post-class period amendment of its 2001 Form 10-K; evidence regarding state civil and regulatory settlements and negotiations; evidence regarding the SEC consent decree; due diligence documents concerning the potential merger with Wells Fargo; evidence regarding an alleged "purge"; and other non-public documents regarding predatory lending or re-aging practices.
- Motion *In Limine* No. 2: The Court should preclude reference to the prior proceedings, including testimony or evidence from or about defendants' loss causation expert from the first trial, Dr. Bajaj; the jury's acceptance of the leakage model and the amount of partial judgment and pretrial interest awarded after the first trial; characterizations of the first jury's findings and reference to alleged misstatements other than the 17 found by the first jury; and the Seventh Circuit's opinion and the Court's *Daubert* ruling.
- Motion *In Limine* No. 3: The Court should exclude plaintiffs' expert from expressing opinions not previously disclosed.
- Motion *In Limine* No. 4: The Court should exclude evidence concerning expert witnesses that is unrelated to their opinions or testimony.
- Motion *In Limine* No. 5: The Court should preclude references to non-parties HSBC or HSBC Finance.

Defendants William Aldinger, David Schoenholz, and Gary Gilmer also will be filing:

Motion *In Limine* to bar evidence of their financial condition.

Dated: April 22, 2016

Respectfully submitted,

/s/R. Ryan Stoll

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R. Ryan Stoll

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  HOUSEHOLD INTERNATIONAL, INC., et ) al., )  Defendants. ) _____ )	)	Lead Case No. 02-C-5893 (Consolidated)  <u>CLASS ACTION</u>  Honorable Jorge L. Alonso
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**PLAINTIFFS' STATEMENT OF THE CONTESTED ISSUES OF FACT AND LAW**

**[Exhibit K-1 to [Proposed] Final Pretrial Order]**

Plaintiffs hereby submit their statement of contested issues of fact and law for the trial in this matter.

1. Whether defendants' false or misleading statements and/or omissions were a substantial cause of the economic loss plaintiffs suffered.
2. Whether the plaintiff Class suffered damages and if so, in what per share amount.
3. For the four defendants found to have violated the securities laws, the percentage of responsibility of each defendant for the damages incurred by the plaintiff Class.

DATED: April 22, 2016

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
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LAWRENCE E. JAFFE PENSION PLAN,	)	Lead Case No. 02-C-5893
On Behalf of Itself and All Others Similarly	)	(Consolidated)
Situated,	)	
	)	<u>CLASS ACTION</u>
Plaintiff,	)	
	)	Honorable Jorge L. Alonso
vs.	)	
	)	
HOUSEHOLD INTERNATIONAL, INC., et	)	
al.,	)	
	)	
Defendants.	)	

## **DEFENDANTS' STATEMENT OF THE CONTESTED ISSUES OF FACT AND LAW**

**[Exhibit K-2 to [Proposed] Final Pretrial Order]**

1. Did one or more of the 17 misrepresentations cause an economic loss to the plaintiffs?
2. If any misrepresentation caused an economic loss to the plaintiffs, how much, if at all, did each such misrepresentation artificially inflate Household's stock price?
3. What percentage of proportionate responsibility for plaintiffs' economic loss, if any, is attributable to each of the four defendants?

DATED: 4/22/2016

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