

**FILED**

JUL - 7 2005 WH

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT**



LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,	)
	)
Plaintiff,	)
- against -	)
	)
HOUSEHOLD INTERNATIONAL, INC., ET. AL.,	)
Defendants.	)

Lead Case No. 02-C-5893  
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman  
Magistrate Judge Nan R. Nolan

**AFFIDAVIT OF DAVID OWEN IN SUPPORT OF  
DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION  
TO LEAD PLAINTIFFS' MOTION TO COMPEL THE  
HOUSEHOLD DEFENDANTS TO PRODUCE ELECTRONIC  
EVIDENCE IN NATIVE ELECTRONIC FORMAT**

STATE OF NEW YORK    )  
                                  : ss.:  
COUNTY OF NEW YORK )

DAVID OWEN, being first duly sworn, deposes and says:

1. I am a member of the bar of the State of New York, admitted to this Court *pro hac vice* in connection with the above captioned matter and associated with the firm Cahill Gordon & Rein- del LLP, co-counsel for defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar in this action. I submit this affidavit to place before the Court certain information and documents in support of Defen- dants' Memorandum of Law In Opposition to Lead Plaintiffs' Motion to Compel the Household Defendants to Produce Electronic Evidence in Native Format.

2. Upon information and belief, on April 12, 2005, the parties engaged in a telephonic meet and confer, during which Defendants proposed that the parties go through each term still in dispute and exchange views as to why each term should or should not be added to the protocol.

3. Upon information and belief, a status conference on Plaintiffs' three discovery motions was held on June 9, 2005, during which the Court directed the parties to further "meet and confer" in an effort to eliminate or at least narrow the issues for the Court.

4. The parties engaged in a telephonic meet and confer on June 16, 2005, during which Defendants again proposed that the parties reconsider their positions regarding their search terms still in dispute and go through each term to exchange views regarding why each term should or should not be added to the protocol.

5. Attached hereto as Exhibit 1 is a true and correct copy of the March 10, 2005 Letter of Landis C. Best, Esq. to Luke O. Brooks, Esq. (with attachment).

6. Attached hereto as Exhibit 2 is a true and correct copy of the March 14, 2005, 7:56 p.m. Email of Sylvia Sum, Esq. to Landis C. Best, Esq.

7. Attached hereto as Exhibit 3 is a true and correct copy of the February 11, 2005, 6:57 p.m. Email of Azra Z. Mehdi, Esq. to Landis C. Best, Esq.

8. Attached hereto as Exhibit 4 is a true and correct copy of the March 1, 2005 Letter of Sylvia Sum, Esq. to Landis C. Best, Esq. (with attachment).

9. Attached hereto as Exhibit 5 is a true and correct copy of the March 10, 2005 Letter of Sylvia Sum, Esq. to Landis C. Best, Esq. (with attachment).

10. Attached hereto as Exhibit 6 is a true and correct copy of the March 18, 2005 Letter of Landis C. Best, Esq. to Sylvia Sum, Esq. (with attachments).

11. Attached hereto as Exhibit 7 is a true and correct copy of the March 24, 2005 Letter of Sylvia Sum, Esq. to Landis C. Best, Esq. (with attachment).

12. Attached hereto as Exhibit 8 is a true and correct copy of the April 15, 2005 Letter of Landis C. Best, Esq. to Monique C. Winkler, Esq. (with attachment).

13. Attached hereto as Exhibit 9 is a true and correct copy of the April 19, 2005 Letter of Monique C. Winkler, Esq. to Landis C. Best, Esq.

14. Attached hereto as Exhibit 10 is a true and correct copy of the June 10, 2005 Order of Judge Nan R. Nolan.

15. Attached hereto as Exhibit 11 is a true and correct copy of the June 20, 2005 Letter of Monique C. Winkler, Esq. to Landis C. Best, Esq.

16. Attached hereto as Exhibit 12 is a true and correct copy of the June 22, 2005 Letter of David Owen, Esq. to Monique C. Winkler, Esq.

17. Attached hereto as Exhibit 13 is a true and correct copy of the June 22, 2005 Letter of Azra Z. Mehdi, Esq. to Landis C. Best, Esq.

18. Attached hereto as Exhibit 14 is a true and correct copy of the June 23, 2005 Letter of David Owen, Esq. to Azra Z. Mehdi, Esq.

19. Attached hereto as Exhibit 15 is a true and correct copy of the June 28, 2005 Letter of Monique C. Winkler, Esq. to Landis C. Best, Esq.

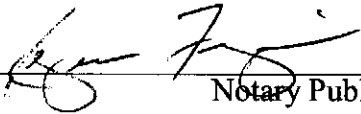
20. Attached hereto as Exhibit 16 is a true and correct copy of the June 29, 2005 Letter of David Owen, Esq. to Monique C. Winkler, Esq.

21. Attached hereto as Exhibit 17 is a true and correct copy of the June 30, 2005 Letter of David Owen, Esq. to Monique C. Winkler, Esq. (with attachments).

22. Attached hereto as Exhibit 18 is a true and correct copy of the July 5, 2005 Letter of Monique C. Winkler, Esq. to Landis C. Best, Esq. and David Owen, Esq.

  
\_\_\_\_\_  
David Owen

Sworn to before me this  
6<sup>th</sup> day of July, 2005.

  
\_\_\_\_\_  
Notary Public

REGINA FINNEGAIN  
Notary Public, State of New York  
No. 24-4671778  
Qualified In Kings County  
Commission Expires 3/30/2006

# **TAB 1**

CAHILL GORDON & REINDEL LLP  
EIGHTY PINE STREET  
NEW YORK, N.Y. 10005-1702

FLORIAN ABRAMS  
L. HOWARD ADAMS  
ROBERT A. ALESSI  
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LANDIS C. BEST  
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W. LESLIE DUFFY  
RICHARD E. FARLEY  
PATRICIA FARREN  
JOAN MURTAGH FRANKEL  
BART FRIEDMAN  
CIRO A. GAMBONI  
WILLIAM B. GANNETT

CHARLES A. GILMAN  
STEPHEN A. GREENE  
ROBERT M. HALLMAN  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DAVID G. JANUSZEWSKI  
THOMAS J. KAVALER  
LAWRENCE A. KOBRIN  
IMMANUEL KOHN  
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GEOFFREY E. LIEBMANN  
MICHAEL MACRIS  
JONATHAN I. MARK  
GERARD M. MEISTRELL  
ROGER MELTZER  
MICHAEL E. MICHETTI  
ATHY A. MOBILIA  
DONALD J. MULVIHILL  
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JOHN SCHUSTER  
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SUSANNA M. SUH  
GERALD S. TANENBAUM  
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RALPH O. WINGER

COUNSEL  
CORYDON B. DUNHAM  
PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

March 10, 2005

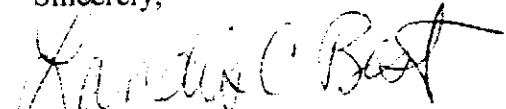
Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. (No. 02-CV-5893) (N.D.Ill.)

Dear Luke:

Further to our telephone call of March 8, attached please find the final agreement between the Household Defendants and Plaintiffs regarding electronic production. We have made the wording change that you suggested in paragraph 4. In addition, we can confirm that the manner in which the native electronic files will be copied should provide plaintiffs with information regarding the source of the document. If for some reason the source is not captured electronically, we will provide same to you.

We are reviewing Plaintiffs' list of proposed search terms for electronic production and will get back to you shortly.

Sincerely,

  
Landis C. Best

Luke Brooks, Esq.  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

cc: Marvin Miller, Esq.  
Adam Deutsch, Esq.  
Stanley Parzen, Esq.

*Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill.)

**Plaintiffs' and Household Defendants'**  
**Understanding Re Production of Documents in Native Format**

1. The Household Defendants will provide the following electronic documents in native format:

- “Excel” documents (and other spreadsheet-type documents),<sup>1</sup>
- Email and attachments (as set forth in paragraph 5 below).

Upon plaintiffs' request, Household will assist in determining the proper software needed (if any) by plaintiffs for reviewing native format documents. Plaintiffs will be responsible for bearing any cost of such software and for executing any necessary confidentiality agreements with respect to any proprietary programs.

2. *Redaction*: Electronic documents that require redaction will not be produced in native format, but will be produced in “TIFF” format, and exported to plaintiffs' Concordance database format. Metadata of all such redacted documents will be produced in delimited text or ASCII format.

3. *Privilege/Confidentiality*: For documents to be designated as confidential pursuant to the November 5, 2004 protective order, the Household Defendants will include a confidential designator in the document name or identifier. Plaintiffs agree to deem disclosure of privileged materials in metadata as inadvertent and will promptly return any such materials to the Household Defendants.

4. *Exhibits*: Only hard copy (*i.e.*, paper) exhibits will be shown to witnesses. With regard to documents prepared by plaintiffs from any native format files produced by the Household Defendants, plaintiffs will bear the burden of authenticating and establishing for both counsel and any witness to whom such documents are shown (and ultimately the Court) the steps taken in producing or preparing hard copy exhibits. For each document shown to a witness or relied upon at trial, plaintiffs shall represent that the document was in fact produced by the Household Defendants in native format to plaintiffs in connection with this case and at a minimum shall identify the CD number on which the document was produced, as well as the path and filename, if they exist. If no path or filename exists, plaintiffs shall identify the document using the CD

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<sup>1</sup> Although the Household Defendants cannot at this time identify all the different types of spreadsheet-type documents existing at Household, the Household Defendants have agreed to produce all spreadsheet-type documents in native format (that are so maintained) unless otherwise agreed to by the parties.

number, the name of the person whose file the document came from, and other information sufficient to identify the document being used as an exhibit — such as the date of an email and the subject line or subject matter. Notwithstanding the foregoing, the Household Defendants reserve the right to object to the authenticity of any document.

5. *Email*: Household used both Lotus Notes and Housemail during the relevant time period.

a. Lotus Notes — Review and production of native format emails will take place with the use of a search term protocol that will search both active and archived mail boxes of designated individuals. Lotus Notes emails (not attachments) will be exported to a full text format and metadata shall be captured and put in a database which will include a link to each attachment. In such instance, attachments will remain in native format. E-mails will be “deduped” across the collection to remove e-mails that are exact duplicates of others which are produced. Bcc’s and forwarded emails shall not be considered exact duplicates. Production will be made in Concordance format and will include the email, metadata, and attachments.

b. Housemail — Housemail shall be produced in paper form.

6. *Prior Proceedings*: The Household Defendants will not produce in native format documents previously produced by defendants in connection with other proceedings, except that the Household Defendants will make a good faith effort to produce in native format documents from those productions specifically requested by plaintiffs in native format. Documents responsive to other existing or future substantive requests will be produced in native format consistent with this proposal, to the extent such documents exist.

7. *Representation*: Prior to production by the Household Defendants of any electronic documents in native format, plaintiffs’ counsel will provide to counsel for the Household Defendants a written representation that they and their clients will not alter or manipulate the substance or contents of any documents produced in native format. Stamping the hard copy version of an electronic document as confidential or Bates-labeling it is not considered an alteration or manipulation of the substance or contents of a document.

8. This understanding does not waive or limit in any way the Household Defendants’ right to object to the admissibility of any document.

9. The parties understand and agree that this proposal is based upon information known to the parties at the time of its negotiation. Should additional information that impacts the provisions of the proposal become known to the parties at a later date, the parties agree to work together in good faith to attempt to reach agreement on how best to proceed.



## **TAB 2**

**Steiner, Mary**

---

**From:** Sylvia Sum [SylviaS@lerachlaw.com]  
**Sent:** Monday, March 14, 2005 7:56 PM  
**To:** Best, Landis C.  
**Cc:** Azra Mehdi; Luke Brooks; Monique Winkler  
**Subject:** Landis:

Landis:

Plaintiffs have reviewed your latest revisions to Plaintiffs' and Household Defendants' Understanding Re Production of Documents in Native Format, faxed to us on March 10, 2005, and accept it, as well as your representation that the native electronic files will provide plaintiffs with information regarding the source of the documents and, if not, you will provide us with the same.

We have already provided you with a list of search terms and an initial custodian list; please advise as to when production will commence.

Sylvia

Sylvia Sum  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
(415) 288-4545  
(415) 288-4534 (fax)

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# **TAB 3**

-----Original Message-----

**From:** Azra Mehdi [mailto:Azram@lerachlaw.com]  
**Sent:** Friday, February 11, 2005 6:57 PM  
**To:** LBest@Cahill.com  
**Cc:** Monique Winkler; Sylvia Sum  
**Subject:** Re: Jaffe

Thanks Landis. I will send you a letter on Monday outlining your original proposal along with modifications agreed by the parties as memorialized in various letters and meet and confers. This way the agreement between us will be memorialized in one document.

Additionally, we will send you a list of custodians and search terms by the end of next week. As I mentioned during the call, this is an initial list. Because production of documents pursuant to several requests in Plaintiffs' First Request for Production of Documents is still pending, any list of custodians we provide you at this stage would logically be incomplete.

>>> "Best, Landis C." <LBest@Cahill.com> 2/9/2005 12:26:02 PM >>>  
Azra:

We have confirmed that the explanation given by David Owen on today's phone call regarding the de-duping treatment of bcc's is correct -- they are not removed as duplicates.

We look forward to receiving plaintiffs' proposal regarding names and search terms for electronic document production.

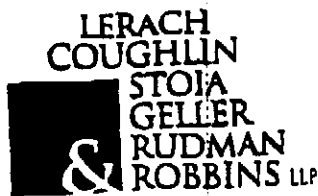
Regards,  
Landis

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# **TAB 4**



SAN DIEGO • SAN FRANCISCO  
LOS ANGELES • NEW YORK • BOCA RATON  
WASHINGTON, DC • HOUSTON  
PHILADELPHIA • SEATTLE

Sylvia Sum  
sylvias@lerachlaw.com

March 1, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis:

Enclosed is a list of plaintiffs' search terms for the Household Defendants' native format production. We are reviewing your comments on the native format proposed and will respond shortly.

We will be providing you with our initial custodian list by the end of the week. Meanwhile, please use these terms to search for responsive documents in the email folders of all Individual Defendants and all Household employees listed on the Household Defendants' Initial Disclosures.

Please note that iterate forms of nouns include verbs and adjectives, as well as plurals, of the word. For instance, iterate forms of the word abuse include abusing, abused, abusive, abuser and abusers. Further, for words or phrases containing two or more words, we would like all iterate forms of the words or phrases; for instance, backdate or back date or back-date.

In addition, we would like you to provide plaintiffs with a list of the actual terms used in the search, including all iterate forms of the terms, as well as the protocol used in the search.

Very truly yours,

Sylvia Sum

SS:jc



Landis Best, Esq.  
March 1, 2005  
Page 2

Enclosure

cc: Marvin A. Miller, Esq.  
Adam Deutsch, Esq.

T:\cases\F\household intl\corres\Best\_030105.doc

### List of Search Terms

9/11  
10-K  
10-Q  
2+  
4 star  
4\*star  
8-K  
AA  
abuse (and all other iterate forms of this term)  
acceleration (and all other iterate forms of this term)  
account executive  
accounting principle board  
accrual (and all other iterate forms of this term)  
accusation (and all other iterate forms of this term)  
ACORN  
adjustment (and all other iterate forms of this term)  
advocates for responsible lending  
AE  
affinity  
AFL-CIO  
AG  
aging  
aicpa  
Aldinger  
allegation (and all other iterate forms of this term)  
allowance (and all other iterate forms of this term)  
amortization (and all other iterate forms of this term)  
Andersen  
apb  
appraisal (and all other iterate forms of this term)  
appropriate  
arbitration (and all other iterate forms of this term)  
Archibald  
Arizona  
arrear (and all other iterate forms of this term)  
Association of Community Organizations for Reform Now  
attorney general  
attorneys general  
attrition  
audit (and all other iterate forms of this term)  
auto reage  
automatic (and all other iterate forms of this term)  
automator  
back door (and all other iterate forms of this term)  
backdate (and all other iterate forms of this term)  
back-end (and all other iterate forms of this term)  
Banc One  
bank like (and all other iterate forms of this term)  
bankruptcy (and all other iterate forms of this term)



baracuda  
Barron's  
Bellingham  
Belz  
Beneficial  
Bernie  
Bernstein  
best practices  
bi monthly (and all other iterate forms of this term)  
Bianucci  
Bill  
biweekly (and all other iterate forms of this term)  
bk  
blended rate  
board of directors  
boarding  
Bob  
Bobby  
BOD  
bonus (and all other iterate forms of this term)  
Borchert  
Bowden  
branch audit  
branch managers  
branch visit tracking system  
Brennan  
Brett  
bucket (and all other iterate forms of this term)  
budget (and all other iterate forms of this term)  
Bullard  
buy down (and all other iterate forms of this term)  
bvts  
Cahill  
California  
call center (and all other iterate forms of this term)  
Callahan  
ccs  
cfo  
chairman  
champion challenger  
chance (and all other iterate forms of this term)  
change (and all other iterate forms of this term)  
chapter 13  
chapter 7  
charge off (and all other iterate forms of this term)  
Cheronis  
Christoper  
Chrizzpivo  
Chuck  
CII or C-II (and all other iterate forms of this term)  
clean desk policy  
Cliff

closed ended (and all other iterate forms of this term)  
co-brand (and all other iterate forms of this term)  
collection (and all other iterate forms of this term)  
collector (and all other iterate forms of this term)  
comparable  
comparable rate  
comparative rate  
compensation (and all other iterate forms of this term)  
complaint  
comply (and all other iterate forms of this term)  
comprehensive audit  
concern (and all other iterate forms of this term)  
confusion (and all other iterate forms of this term)  
Connaughton  
consent decree  
consumer  
control (and all other iterate forms of this term)  
Cory  
counter  
credit  
Cross  
cts  
Cunningham  
customer service  
Dan  
DAS  
Dave  
David  
Davis  
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defer  
delay codes  
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Dennis  
Denver  
Department of Financial Institutions  
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DGM  
DIL  
DIP  
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Don  
Doug

Douglas  
Drury  
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Edward  
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Elden  
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GAAS  
Garwall  
Gary  
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generally accepted auditing standards  
gfe  
Gilmer  
gm  
Goldman  
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Gorrell

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Gregoire  
Gunderson  
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Hills  
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HSBC  
Hueman  
Huey  
Huggins  
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James  
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Jeff  
Jennifer  
Jim  
John  
Johnson  
Kara  
Keckman  
Keller  
Ken  
Kessler  
KPMG

Kuipers  
Kustenda  
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Lou  
LTV  
Luisi  
Luna  
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Margaret  
margin  
Markell  
market (and all other iterate forms of this term)  
mastercard  
MBO  
McClayton  
McCormick  
McDonald  
McGrane  
Megan  
Mehra  
Melissa  
Merrill  
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Mike  
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Mizialko  
modification (and all other iterate forms of this term)  
Monique  
Moody's  
Moravy  
Mortgage Services  
mortgageserv  
multi state (and all other iterate forms of this term)

multiple  
Musil  
natural disaster (and all other iterate forms of this term)  
near-prime (and all other iterate forms of this term)  
net interest margin  
net realizable value  
New York  
Nick  
nim  
nomura (and all other iterate forms of this term)  
non sufficient funds (and all other iterate forms of this term)  
North Carolina  
nr  
nsf  
numbers (and all other iterate forms of this term)  
OCC  
open ended (and all other iterate forms of this term)  
origination cost  
OTS  
overappraised (and all other iterate forms of this term)  
Overstreet  
Pantelis  
paperless  
Parlette  
Patrick  
Paul  
pay down (and all other iterate forms of this term)  
pay right rewards  
payment (and all other iterate forms of this term)  
penalty (and all other iterate forms of this term)  
percentage  
personal home owners loan  
Peteren  
Peters  
PHL  
piggyback (and all other iterate forms of this term)  
Plack  
POC  
points  
policy  
pool  
portfolio  
Potter  
PPP  
practice (and all other iterate forms of this term)  
predatory  
prepayment (and all other iterate forms of this term)  
PriceWaterhouse Coopers (and all other iterate forms of this term)  
private label  
privilege period  
profit (and all other iterate forms of this term)  
prohibited sales practices

projection (and all other iterate forms of this term)  
PWC  
qac (and all other iterate forms of this term)  
quarterly reports  
rapid response team  
rating (and all other iterate forms of this term)  
re age (and all other iterate forms of this term)  
re write (and all other iterate forms of this term)  
Real estate owned  
real estate settlement procedures act  
receivables  
recidivism  
reconciliation (and all other iterate forms of this term)  
refinance (and all other iterate forms of this term)  
regional managers  
regulation x  
regulation z  
Renaissance  
REO  
report (and all other iterate forms of this term)  
repurchase (and all other iterate forms of this term)  
re-reage  
rescission  
reserve (and all other iterate forms of this term)  
reset (and all other iterate forms of this term)  
respa  
restatement (and all other iterate forms of this term)  
restructure (and all other iterate forms of this term)  
retention (and all other iterate forms of this term)  
retribution (and all other iterate forms of this term)  
Revenue  
revision (and all other iterate forms of this term)  
reward (and all other iterate forms of this term)  
rewrites (and all other iterate forms of this term)  
Rhannon  
Richards  
Rick  
right rewards  
risk  
Robin  
Rod  
rogue  
roll rates (and all other iterate forms of this term)  
Ron  
Ruiz  
run rates (and all other iterate forms of this term)  
Ruttand  
Rybak  
S&P (and all other iterate forms of this term)  
Sam  
Sarbanes Oxley (and all other iterate forms of this term)  
scam

scapegoat  
scheme  
Schneider  
Schoenholz  
Schwager  
Scott  
script (and all other iterate forms of this term)  
scrum  
SEC  
securitization (and all other iterate forms of this term)  
security (and all other iterate forms of this term)  
self serving (and all other iterate forms of this term)  
senior credit risk update meeting  
senior management  
settlement (and all other iterate forms of this term)  
sfas  
Sharon  
Shrarovsky  
shred (and all other iterate forms of this term)  
Shrum  
simple interest  
skip a pay (and all other iterate forms of this term)  
Smith  
Snyder  
Sodeika  
Sonenthol  
special  
spike (and all other iterate forms of this term)  
Sprude  
Stacey  
statement of financial accounting standard  
static  
Steve  
Steven  
Stevens  
Stewart  
stoc  
stock  
Streem  
structure (and all other iterate forms of this term)  
subpoena (and all other iterate forms of this term)  
subprime (and all other iterate forms of this term)  
T chart (and all other iterate forms of this term)  
t presentation (and all other iterate forms of this term)  
t sale (and all other iterate forms of this term)  
tangible benefits  
Tanya  
target (and all other iterate forms of this term)  
t-chart (and all other iterate forms of this term)  
TDR  
Terese  
Tery



Texas  
Therese  
Thomas  
til  
tila  
Tom  
tracking (and all other iterate forms of this term)  
trainer (and all other iterate forms of this term)  
Transamerica  
trend (and all other iterate forms of this term)  
Troubled Debt Restructure  
truth in lending (and all other iterate forms of this term)  
turnover (and all other iterate forms of this term)  
unauthorized (and all other iterate forms of this term)  
uncollectable  
underwriting (and all other iterate forms of this term)  
Union Privilege  
unlawful  
up front (and all other iterate forms of this term)  
up selling (and all other iterate forms of this term)  
Uphoff  
vintage (and all other iterate forms of this term)  
Visa  
Vision  
void (and all other iterate forms of this term)  
volume  
Vozar  
Walsh  
Walt  
Washington  
Wehrenberg  
wfa  
whistleblower  
white knight  
William  
Wilmer Cutler (and all other iterate forms of this term)  
work papers (and all other iterate forms of this term)  
Worwa  
write-down (and all other iterate forms of this term)  
wtc  
Zaljco  
zero



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# FACSIMILE

	<u>Fax No.</u>	<u>Telephone No.</u>
<b>To:</b> Landis Best, Esq. Cahill Gordon & Reindel LLP	212/269-5420	212/701-3000
Adam B. Deutsch, Esq. Eimer Stahl Klevorn & Solberg LLP	312/692-1718	312/660-7600
Marvin A. Miller, Esq. Miller Faucher and Cafferty LLP	312/782-4485	312/782-4880

**From:** Sylvia Sum **Date:** March 1, 2005

**Case Code:** 020377-00001

**Subject:** *Jaffe v. Household International Inc., et al.,*  
Case No. 02-CIV-5893 (N.D. Ill.)

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# **TAB 5**



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Sylvia Sum  
sylvias@ierachlaw.com

March 10, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis:

I write to follow up on the pending native format production proposal. As we informed you on March 8, 2005, the language proposed in your March 4, 2005 email is acceptable to plaintiffs with the minor language modifications we suggested, so long as the Household Defendants agree to provide logs identifying the source of the electronic files (which are essential for plaintiffs to comply with the terms you proposed). Plaintiffs await your revised proposal.

Plaintiffs have already provided you with a list of the search terms we would like used for searches related to the native format production. I include with this letter an initial list of custodians whose files plaintiffs would like searched (in addition to those of the Individual Defendants and all Household employees listed on the Household Defendants' Initial Disclosures). As we have previously mentioned on numerous occasions, plaintiffs are continuing to review the documents produced by Household and will provide you with additional custodian names at a later time.

Very truly yours,

Sylvia Sum

SS:jc  
Enclosure

cc: Marvin A. Miller, Esq.  
Adam Deutsch, Esq.  
TA\Cases\SP\Household Intl\Comes\LTR Best 3-10-05.doc

100 Pine Street, 26th Floor • San Francisco, CA 94111 • 415.288.4545 • Fax 415.288.4534 • www.ierachlaw.com

**Custodian List (as of March 10, 2005)**

1. Abanero, Jose T.
2. Adams, Gary M.
3. Adams, Lisa L.
4. Aita, Marcelo A.
5. Aldinger, William F.
6. Allcock, Robin L.
7. Allen, Cris
8. Ancona, Edgar D.
9. Anderson, Aaron E.
10. Anderson, Dan W.
11. Andreuzzi, Paul
12. Apostol, George M.
13. Armstrong, Michelle
14. Ashley, Scott R.
15. Aspiras, JayWalter P.
16. Azia, Arif
17. Bales, Ronald K.
18. Barnes, Elizabeth (Liz)
19. Basilotto, Stephen C.
20. Batka, Jeffrey P.
21. Biester, Michael R.
22. Black, Donna L.  
aka Black-Schelonka, Donna L.  
aka Schelonka, Donna L.
23. Blenke, John W.
24. Bobola, Megan
25. Boris, Larry P.
26. Bosson, Janine
27. Bovington, Jason
28. Bowman, Kenneth P.
29. Boyd, Nancy L.
30. Bransford, Jeffery S.
31. Brashier, Sandra
32. Brooke, Noelle
33. Brown, Ron

- 34. Brugato, Jeffrey A.
- 35. Buxbaum, Cathy
- 36. Carlson, Patricia A.  
or Carlson, Pat  
or Carlson, P A.
- 37. Carrier, Rence
- 38. Castelein, Craig L.
- 39. Caulfield, Ramon
- 40. Chacon, Yvonne
- 41. Chadwick, Paisha
- 42. Chan, Joseph K.
- 43. Chase-Gura, Lynda A.
- 44. Chester, Pamela
- 45. Chow, Dan S.
- 46. Christian, Pamela H.
- 47. Clarke, Lidney B.
- 48. Cleland, Mike
- 49. Clements, Jim A.
- 50. Cliff, D G.
- 51. Cofield, Ramon
- 52. Coleman, Onya
- 53. Colip, Chuck A.
- 54. Condon, Tim R.
- 55. Condon, Tim R.
- 56. Connaughton, James F.
- 57. Connell, Lawrence
- 58. Contino, Rick
- 59. Coppentrath, Joan
- 60. Corriher, David
- 61. Cota, Gina
- 62. Cozza, Patrick A.
- 63. Cruz, John
- 64. Cunningham, Curt
- 65. Curse, Jeff
- 66. Cusenza, Rocco A.
- 67. Custis, Robert M.
- 68. Czerw, Carol

69. Dahlin, Thomas C.
70. Daskalakis, Christine
71. Davis, John R.
72. DeLuca, Michael
73. Derickson, Sandra (Sandy) L.
74. Detelich, Thomas M.
75. Dibble, Parkes C.
76. Dominski, Thomas S
77. Dougherty, Michael A.
78. Dunlap, Rafe B.
79. Eckert, Barbara L.
80. Eckholdt, Per or  
Ekholdt, Per
81. Eklund, Jonas
82. Emerson, Traci
83. Esposito, Gary R.
84. Evans, Sandra
85. Fabiano, Rocco J.
86. Farrell, Diana S.
87. Fatina, David J.
88. Folia, Marianna
89. Ford, Shawn
90. Foster, Bruce A.
91. Francis, Jim
92. Frantz, Jacob
93. Friedrich, Douglas A.
94. Fullen, Bernard
95. Gale, Lori
96. Gang, Kenneth K.
97. Garcia, Anabelle
98. Garcia, Jorge
99. Gardner, Davin L.
100. Gargul, Elisa M.
101. Garland, Scott
102. Genco, Lucille
103. Gibbs, Anthony R.
104. Gibson, Gregory A.

- 105. Gillan-Myer, Maure
- 106. Gilmer, Gary D.
- 107. Goldstein, Eric
- 108. Gordon, Gerard
- 109. Guglomo, Sasha
- 110. Guy, Michelle L.
- 111. Hamilton, John R.
- 112. Hammersley, Bruce
- 113. Handy, Catherine C.
- 114. Hansgen, Beth
- 115. Harman, Gary S.
- 116. Harmon, Thomas J.
- 117. Harris, Greg H.
- 118. Harvey, Ken
- 119. Hawkins, Darryl
- 120. Hayden, Megan E.
- 121. Haynes, Bob
- 122. Helm, Ewa
- 123. Helmer, Charles (Chuck) J.
- 124. Herman, Matt
- 125. Hicks, Stephen L.
- 126. Hill, Adrian
- 127. Hinson, Thomas L.
- 128. Hoff, Joseph W.
- 129. Hopkins, James N.
- 130. Hucman, Dennis J.
- 131. Ibrahim, Ashraf R.
- 132. Inman, Rick
- 133. Innis, Joe
- 134. Jaiette, Peter
- 135. Jebson, Alan
- 136. Johnston, Andy
- 137. Johnston, Mary B.
- 138. Jones, Brad
- 139. Jones, Terrell
- 140. Joseph, Madline
- 141. Kaminski, Jadwiga



- 142. Kasarda, Andrew G.
- 143. Kauffman, James B.
- 144. Kelly, Colin P.
- 145. Kelly, Joe J.
- 146. Khan, Arif M.
- 147. Kjoller, Gary
- 148. Klein, Kenneth
- 149. Klesse, Dick
- 150. Knox, Deana C.
- 151. Kong, Xiang
- 152. Krupowicz, Phil L.
- 153. Lawrence, Jim
- 154. Lee, Jimmy S.
- 155. Lenz, Lionel P.
- 156. Leopold, Mark F.
- 157. Leski, Anita L.
- 158. Leyba, Mark
- 159. Lin, Linda
- 160. Little, David B.
- 161. Lirtrell, Wayne
- 162. Loots, Joseph G.
- 163. Lubiana, Walter
- 164. Lynn, Stacey D.  
aka Lynn-Cravotta, Stacey
- 165. MacAlpine, Sharon A.
- 166. Madison, Kathryn
- 167. Makowski, Paul A.
- 168. Malchev, Hristo T.
- 169. Malik, Paul
- 170. Marcus, Michael E.
- 171. Markell, Elaine H.
- 172. Marks, Mike
- 173. Markwat, William A.
- 174. Marsh, David G.
- 175. Martinez, Richard J.
- 176. Matthews, Michael
- 177. Mauk, Tom M.

- 178. McCracken, Robert W.
- 179. McDonald, Steve L.
- 180. McEvoy, Kent D.
- 181. McGinnis, Iris C.
- 182. McKay, Chris J.
- 183. McKinney, Christopher
- 184. McPhee, Bert
- 185. Mehta, Bobby N.
- 186. Melcer, David
- 187. Menezes, Walter G.
- 188. Mielitz, Doug
- 189. Miles, Grant F.
- 190. Millick, Lois
- 191. Minarik, Persia
- 192. Mirabella, Timothy R.
- 193. Mizialko, Cliff S.
- 194. Mocerino, Susan R.
- 195. Monaco, Paula E.
- 196. Mondoro, John
- 197. Moriarty, Anne M.
- 198. Morris, Dennis D.
- 199. Morris, Loren J.
- 200. Morrison, Kathleen A.
- 201. Mowry, Scott S.
- 202. Myers, Amy
- 203. Naikine, Oleg N.
- 204. Nardi, Frank L.
- 205. Nauman, David J.
- 206. Nelson, Kimberly
- 207. Nicholson, Maria A.
- 208. Nicola, Jeff
- 209. Noel, Elizabeth K.
- 210. Noll, Marcus
- 211. Nugent, Janice
- 212. O'Brien, David M.
- 213. O'Brien, John J.
- 214. O'Han, Robert

- 215. O'Neill, Christopher
- 216. Ochoa, Louis
- 217. Oguntokun, Femi
- 218. Orbanosky, Brandon
- 219. Orman, Rudy A.
- 220. Owens, Meric L.
- 221. Panarsese, Joseph
- 222. Pantelis, Daniel J.
- 223. Payne, Lauren
- 224. Peart, Steve J.
- 225. Pedraja, Gloria V.
- 226. Pendergast, John C.
- 227. Peoples, Willie C.
- 228. Perillo, Tom M.
- 229. Pesicka, Robert J.
- 230. Peters, Craig S.
- 231. Peters, Rich
- 232. Phan, Cong T.
- 233. Pickrell, Denise
- 234. Pinto, Mike
- 235. Pready, Alex
- 236. Price, Terry
- 237. Priester, James
- 238. Qu, Yingbin
- 239. Quiriconi, Kathy R.
- 240. Rafferty, Mike M.
- 241. Raisbeck, Jean
- 242. Reault, Eric
- 243. Redmon, Gina
- 244. Reeves, Mike A.
- 245. Reid, Dan
- 246. Requa, Marcus
- 247. Reuter, Rick A.
- 248. Rhinehart, Scott K.
- 249. Rindler, John L.
- 250. Robarge, Geraldine
- 251. Robertson, Candis

- 252. Robin, Kenneth H.
- 253. Rockaway, Sean
- 254. Rodgers, Carolyn S.
- 255. Rodriguez, Belkys
- 256. Rodriguez, Robert A.
- 257. Rogers, Bill R.
- 258. Rogers, Conne F.
- 259. Rogers, Derek
- 260. Rossi, Michael A.
- 261. Rossi, Ron
- 262. Rubino, Paul G.
- 263. Rugar, Anthony
- 264. Rutland Drury, Melissa
- 265. Rybak, Walt
- 266. Salas, Kathy
- 267. Scherbaum, Brian J.
- 268. Schneider, Tom G.
- 269. Schoenholz, David A.
- 270. Schriever, Sharon
- 271. Schrum, Edward J.
- 272. Seaton, Victor
- 273. Sekany, Bob
- 274. Sesterhenn, Pete E.
- 275. Shrum, John
- 276. Siddique, Tariq S.
- 277. Sizemore, Michael
- 278. Skonning, Michael L.
- 279. Smith, Connie A.
- 280. Smith, Steven H.
- 281. Snyder, Chris A.
- 282. Sodeika, Lisa M.
- 283. Soria, Socorrow
- 284. Sproule, Mark
- 285. Sprude, Margaret A.
- 286. Stanley, Tom
- 287. Starke, Nancy L.
- 288. Starke, Robert (Bob) E.

- 289. Stender, Thomas
- 290. Sthrome, Russ
- 291. Stockdale, Dave K.
- 292. Stream, Craig A.
- 293. Strybel, Jennifer A.
- 294. Sullivan, Marilou E.
- 295. Summers, Sarah
- 296. Szpara, Mary
- 297. Taxer, Devra R.
- 298. Teng, Tom Q
- 299. Thiemann, Daniel E.
- 300. Thurman, Shawn
- 301. Titus, Tim J.
- 302. Tomasula, Steve
- 303. Tomlinson, Sasha
- 304. Tsihlis, Sam
- 305. Turner, Steve
- 306. Tuyorada, Rebecca
- 307. Tyra, David W.
- 308. Uphoff, John F.
- 309. Urbance, Dave W.
- 310. Vail, Matt
- 311. Vertolli, Sero A.
- 312. Vires, Michael A.
- 313. Viswanathan, Mahesh
- 314. Vozar, Joe A.
- 315. Waghmare, Tushar M.
- 316. Walloga, Michael L.
- 317. Watson, Gail
- 318. Weaver, Ken
- 319. Weinstein, Bill
- 320. Wheeler, Michael S.
- 321. Wheelock, Jeanette
- 322. Wilson, Bernie
- 323. Wilson, George O.
- 324. Wilson, Peter S.
- 325. Windle, David H.

- 326. Wojcik, Gina M.
- 327. Worrell, Victoria
- 328. Worwa, Christine K.
- 329. Wright, Douglas N.
- 330. Wright, Jennifer I.
- 331. Ye, Lynn L.
- 332. Young, Bill
- 333. Young, Stephen J.
- 334. Youngberg, Lisa A.
- 335. Zugchar, Alan M.

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Adam B. Deutsch, Esq. Eimer Stahl Kievorn & Solberg LLP	312/692-1718	312/660-7600

**From:** Sylvia Sum **Date:** March 10, 2005

**Case Code:** 020377-00001

**Subject:** *Jaffe v. Household International Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill.)

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# **TAB 6**



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L. HOWARD ADAMS  
ROBERT A. ALESSI  
ROGER ANDRUS  
HELENE R. BANKS  
MICHAEL A. BECKER  
LANDIS C. BEST  
GARY A. BROOKS  
SUSAN BUCKLEY  
KEVIN J. BURKE  
JAMES J. CLARK  
BENJAMIN J. COHEN  
CHRISTOPHER T. COX  
W. LESLIE DUFFY  
ADAM M. DWORKIN  
RICHARD E. FARLEY  
PATRICIA FARRIN  
JOAN MURTAGH FRANKEL  
BART FRIEDMAN  
CIRO A. GAMBONI  
WILLIAM B. GANNETT  
CHARLES A. GILMAN

STEPHEN A. GREENE  
ROBERT M. HALLMAN  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DAVID G. JANUSZEWSKI  
ELAI KATZ  
THOMAS J. KAVALER  
LAWRENCE A. KOBRIN  
IMMANUEL KOHN  
EDWARD P. KRUGMAN  
JOEL KURTZBERG  
GEOFFREY E. LIEBMANN  
MICHAEL MACRIS  
ANN S. MAKICH  
JONATHAN I. MARK  
GERARD M. MEISTRELL  
ROGER MELTZER  
MICHAEL E. MICHETTI  
ATHY A. MOBILIA  
DONALD J. MULVIHILL  
NOAH B. NEWITZ  
KENNETH W. ORCE

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AUGUSTINE HOUSE  
6A AUSTIN FRIARS  
LONDON, ENGLAND EC2N 2HA  
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WRITER'S DIRECT NUMBER

(212) 701-3694

JOHN PAPACHRISTOS  
LUIS R. PENALVER  
ROY L. REGOZIN  
DEAN RINGEL  
JAMES ROBINSON  
THORN ROSENTHAL  
JONATHAN A. SCHAFFZIN  
JOHN SCHUSTER  
HOWARD G. SLOANE  
LAURENCE T. SORKIN  
LEONARD A. SPIVAK  
SUSANNA M. SUH  
GERALD S. TANENBAUM  
JONATHAN D. THIER  
JOHN A. TRIPODORO  
ROBERT USADI  
GEORGE WAILAND  
GLENN J. WALDRIP, JR.  
MICHAEL B. WEISS  
DANIEL J. ZUBKOFF

SENIOR COUNSEL  
WALTER C. CLIFF  
DAVID R. HYDE  
WILLIAM T. LIFLAND  
DENIS MCINERNEY  
MATHIAS E. MONE  
IRWIN SCHNEIDERMAN  
JOHN R. VAUGHAN  
GARY W. WOLF

COUNSEL  
CORYDON B. DUNHAM  
PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

March 18, 2005

Re: Jaffe v. Household International Inc., et al.  
(No. 02-CV-5893) (N.D.Ill.)

Dear Sylvia:

We respond to your letters of March 10 and March 1 proposing initial custodian lists and search terms for electronic production. We believe that plaintiffs' proposed protocol is grossly overbroad and will lead to unnecessary expense and burden on the part of the Household defendants, especially as we head into mediation in May.

The proposed list of search terms spans 10 pages and lists well over 500 terms, especially when one considers the request for all other iterate forms of many of the proposed terms. We do not know what "9/11" has to do with this litigation. Moreover words such as "Bill" are incredibly overbroad — the term will pull up every time the word "bill" was used, which is no doubt very often in a lending institution such as Household. Citing just a couple of additional examples of terms that are breathtakingly broad: "consumer," "interest", and "report."

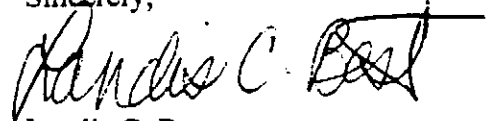
The proposed custodians list likewise spans 10 pages. It contains 335 names, many of whom are not individuals involved in senior management and could have no conceivable connection to the claims in your complaint. What's more, we understand that this is just an "initial" custodian list and that you will add more names at a later date.

Given these circumstances, we thus make the following counter-proposal. As for custodians, we propose to begin with the 27 Household employees listed in Household's initial disclosures. For ease of reference, those individuals are listed at Exhibit A. Whether additional names should be added to the custodian list can be discussed after the conclusion of the mediation. As for search terms, attached at Exhibit B is our counter-proposal (both a clean copy and a redlined version). While we remain willing to talk about any further suggested changes, we are firmly against a protocol that is anywhere as broad as your original proposal.

CAHILL GORDON & REINDEL LLP

-2-

Sincerely,



Landis C. Best

Sylvia Sum, Esq.  
Lerach Coughlin Stoia Geller Rudman  
& Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

[attachments]

cc: Adam Deutsch, Esq.  
Marvin Miller, Esq.  
Stanley Parzen, Esq.

**EXHIBIT A**

**List of Custodians  
(Taken from the Household Defendants' Initial Disclosures)**

1. William F. Aldinger
2. David A. Schoenholz
3. Gary Gilmer
4. Tom Detelich
5. James B. Kaufman
6. Steve Matasek
7. Steven L. McDonald
8. Cliff Mizalko, Jr.
9. Paul A. Makowski
10. Dan Pantelis
11. John Davis
12. Margaret Sprude
13. John Uphoff
14. Bernie Wilson
15. Walt Rybak
16. Joseph A. Vozar
17. Joe Hoff
18. James Connaughton
19. Timothy Condon
20. Craig Peters
21. Rich Peters
22. Chris Worwa
23. Thomas Schneider
24. Stephen Hicks
25. Jeff Hood
26. Lisa Sodeika
27. Larry Zell

**EXHIBIT B**

**List of Search Terms**

10-K  
10-Q  
2+  
8-K  
AA  
accounting principle board  
ACORN  
advocates for responsible lending  
affinity  
AFL-CIO  
AG  
Aldinger  
Andersen  
Association of Community Organizations for Reform Now  
attorney general  
attorneys general  
audit (and all other iterate forms of this term)  
auto reage  
bank like (and all other iterate forms of this term)  
bankruptcy (and all other iterate forms of this term)  
Barron's  
Bellingham  
best practices  
bk  
blended rate  
board of directors  
branch audit  
bucket (and all other iterate forms of this term)  
buy down (and all other iterate forms of this term)  
chapter 13  
chapter 7  
charge off (and all other iterate forms of this term)  
closed ended (and all other iterate forms of this term)  
co-brand (and all other iterate forms of this term)  
collection (and all other iterate forms of this term)  
consent decree  
defer  
delinquency (and all other iterate forms of this term)  
disclosure (and all other iterate forms of this term)  
earnings per share (and all other iterate forms of this term)  
effective interest rate  
equivalent interest rate  
extension (and all other iterate forms of this term)  
EZ Pay

financial relations conference  
Fitch  
forebearance (and all other iterate forms of this term)  
foreclosure (and all other iterate forms of this term)  
fraud (and all other iterate forms of this term)  
GAAP  
GAAS  
generally accepted accounting principles  
generally accepted auditing standards  
Gilmer  
help  
home owners loan proposal  
illegal  
investigation (and all other iterate forms of this term)  
KPMG  
LTV  
Luna  
Markell  
mastercard  
misrepresentation (and all other iterate forms of this term)  
modification (and all other iterate forms of this term)  
Moody's  
multi state (and all other iterate forms of this term)  
net interest margin  
open ended (and all other iterate forms of this term)  
pay down (and all other iterate forms of this term)  
pay right rewards  
PPP  
predatory  
prepayment (and all other iterate forms of this term)  
prohibited sales practices  
rapid response team  
rating (and all other iterate forms of this term)  
re age (and all other iterate forms of this term)  
re write (and all other iterate forms of this term)  
Real estate owned  
recidivism  
REO  
re-reage  
rescission  
reserve (and all other iterate forms of this term)  
restatement (and all other iterate forms of this term)  
restructure (and all other iterate forms of this term)  
right rewards  
rogue  
roll rates (and all other iterate forms of this term)  
run rates (and all other iterate forms of this term)  
S&P (and all other iterate forms of this term)  
Schoenholz  
script (and all other iterate forms of this term)  
SEC

senior management

sfas

skip a pay (and all other iterate forms of this term)

tangible benefits

unlawful

up selling (and all other iterate forms of this term)

Visa

Vision

Vozar

whistleblower

REDLINED

EXHIBIT B

List of Search Terms

~~9/11~~

10-K

10-Q

2+

~~4 star~~

~~4\*star~~

8-K

AA

~~abuse (and all other iterate forms of this term)~~

~~acceleration (and all other iterate forms of this term)~~

~~account executive~~

accounting principle board

~~accrual (and all other iterate forms of this term)~~

~~accusation (and all other iterate forms of this term)~~

ACORN

~~adjustment (and all other iterate forms of this term)~~

advocates for responsible lending

~~AE~~

affinity

AFL-CIO

AG

aging

~~aepea~~

Aldinger

~~allegation (and all other iterate forms of this term)~~

~~allowance (and all other iterate forms of this term)~~

~~amortization (and all other iterate forms of this term)~~

Andersen

~~apb~~

~~appraisal (and all other iterate forms of this term)~~

appropriate

~~arbitration (and all other iterate forms of this term)~~

Archibald

Arizona

~~arrears (and all other iterate forms of this term)~~

Association of Community Organizations for Reform Now

attorney general

attorneys general

~~attrition~~

~~audit (and all other iterate forms of this term)~~

auto reage

~~automatic (and all other iterate forms of this term)~~

~~automator~~

~~back door (and all other iterate forms of this term)~~

~~backdate (and all other iterate forms of this term)~~  
~~back-end (and all other iterate forms of this term)~~  
Banc One  
bank like (and all other iterate forms of this term)  
bankruptcy (and all other iterate forms of this term)  
~~baracuda~~  
Barron's  
Bellingham  
Belz  
Beneficial  
Bernie  
Bernstein  
best practices  
~~bi-monthly (and all other iterate forms of this term)~~  
Bianucci  
Bill  
~~biweekly (and all other iterate forms of this term)~~  
bk  
blended rate  
board of directors  
boarding  
Bob  
Bobby  
BOD  
~~bonus (and all other iterate forms of this term)~~  
Borchert  
Bowden  
branch audit  
branch managers  
branch visit tracking system  
Brennan  
Brett  
bucket (and all other iterate forms of this term)  
~~budget (and all other iterate forms of this term)~~  
Bullard  
buy down (and all other iterate forms of this term)  
bvts  
Cahill  
California  
~~call center (and all other iterate forms of this term)~~  
Callahan  
ees  
efe  
chairman  
champion-challenger  
~~chance (and all other iterate forms of this term)~~  
~~change (and all other iterate forms of this term)~~  
chapter 13  
chapter 7  
charge off (and all other iterate forms of this term)  
Cheronis



Christopher  
Chrispius  
Chuck  
~~CII or C-II (and all other iterate forms of this term)~~  
clean desk policy  
Cliff  
closed ended (and all other iterate forms of this term)  
co-brand (and all other iterate forms of this term)  
collection (and all other iterate forms of this term)  
~~collector (and all other iterate forms of this term)~~  
comparable  
comparable rate  
comparative rate  
compensation (and all other iterate forms of this term)  
complaint  
comply (and all other iterate forms of this term)  
comprehensive audit  
concern (and all other iterate forms of this term)  
~~confusion (and all other iterate forms of this term)~~  
Connaughton  
consent decree  
consumer  
control (and all other iterate forms of this term)  
Cory  
counter  
credit  
Cross  
ets  
Cunningham  
customer service  
Dan  
DAS  
Dave  
David  
Davis  
Decision One  
deed in lieu  
defer  
delay codes  
delinquency (and all other iterate forms of this term)  
Dennis  
Denver  
Department of Financial institutions  
destruction (and all other iterate forms of this term)  
Detelich  
DFI  
DGM  
DIL  
DIP  
direct discharge (and all other iterate forms of this term)  
disclosure (and all other iterate forms of this term)

~~discount points~~  
~~diserepancy (and all other iterate forms of this term)~~  
DMP  
dod  
Don  
Doug  
Douglas  
Drury  
earnings per share (and all other iterate forms of this term)  
Edward  
effective interest rate  
eitf  
Elden  
eligible  
engagement (and all other iterate forms of this term)  
equity  
equivalent interest rate  
~~erisa lawsuit (and all other iterate forms of this term)~~  
~~estimates (and all other iterate forms of this term)~~  
~~examination (and all other iterate forms of this term)~~  
~~exceptions (and all other iterate forms of this term)~~  
~~expense (and all other iterate forms of this term)~~  
~~extension (and all other iterate forms of this term)~~  
EZ Pay  
FARM  
faleon  
FDIC  
~~federal financial institutions examination council~~  
~~fee (and all other iterate forms of this term)~~  
Feeney  
FFIEC  
~~feo (and all other iterate forms of this term)~~  
financial relations conference  
financial statements  
Fitch  
flag  
Florida  
flush  
Forbes  
forebearance (and all other iterate forms of this term)  
~~forecast (and all other iterate forms of this term)~~  
foreclosure (and all other iterate forms of this term)  
four star  
fraud (and all other iterate forms of this term)  
Friedrich  
~~front end (and all other iterate forms of this term)~~  
GAAP  
GAAS  
Garwall  
Gary  
generally accepted accounting principles

generally accepted auditing standards  
gfe  
Gilmer  
gm  
Goldman  
good faith estimate  
Gorrell  
Grant  
Greg  
Gregoire  
Gunderson  
Hayden  
headline (and all other iterate forms of this term)  
headquarters (and all other iterate forms of this term)  
Hedges  
hfe  
hfs  
Hiels  
Hills  
HIP  
hip pocket  
hoepa  
Hoey  
Hoff  
holp  
home owners ~~lead~~loan proposal  
~~Household Initiate Payment~~  
Howard  
HSBC  
Hueman  
Huey  
Huggins  
ICP  
illegal  
impact  
incentive (and all other iterate forms of this term)  
incentivize  
injunction (and all other iterate forms of this term)  
insurance (and all other iterate forms of this term)  
integrity  
interest  
interest short  
inventory  
investigation (and all other iterate forms of this term)  
investors  
Iowa  
James  
Janeway  
Jeff  
Jennifer  
Jim

John  
Johnson  
Karla  
Keckman  
Keller  
Ken  
Kessler  
KPMG  
Kuipers  
Kustenda  
Kwidzinski  
Larry  
lawsuit  
lead-generation  
Lechtenberg  
legacy  
legendary-performers  
~~lender (and all other iterate forms of this term)~~  
Levy  
~~life (and all other iterate forms of this term)~~  
Lisa  
litigation  
Littler  
~~loan (and all others iterate forms of this term)~~  
loss-mitigation  
Lou  
LTV  
Luisi  
Luna  
maintenance  
Makowski  
~~maneuver (and all other iterate forms of this term)~~  
~~manipulation (and all other iterate forms of this term)~~  
manual  
Margaret  
margin  
Markell  
~~market (and all other iterate forms of this term)~~  
mastercard  
MBO  
McClayton  
McCormick  
McDonald  
McGrane  
Megan  
Mehta  
Melissa  
Merrill  
methodology  
Mike  
~~mischaracterization (and all other iterate forms of this term)~~

misrepresentation (and all other iterate forms of this term)  
Mizialke  
modification (and all other iterate forms of this term)  
Monique  
Moody's  
Moravy  
Mortgage Services  
mortgageserv  
multi state (and all other iterate forms of this term)  
multiple  
Musil  
natural disaster (and all other iterate forms of this term)  
near-prime (and all other iterate forms of this term)  
net interest margin  
net realizable value  
New York  
Nick  
nim  
nomura (and all other iterate forms of this term)  
non-sufficient funds (and all other iterate forms of this term)  
North Carolina  
nrv  
nsf  
numbers (and all other iterate forms of this term)  
OCC  
open ended (and all other iterate forms of this term)  
origination cost  
OTS  
overappraised (and all other iterate forms of this term)  
Overstreet  
Pantelic  
paperless  
Parlette  
Patriek  
Paul  
pay down (and all other iterate forms of this term)  
pay right rewards  
payment (and all other iterate forms of this term)  
penalty (and all other iterate forms of this term)  
percentage  
personal home-owners loan  
Peteren  
Peters  
PHL  
piggyback (and all other iterate forms of this term)  
Plack  
POC  
points  
policy  
pool  
portfolio

Potter

PPP

~~practice (and all other iterate forms of this term)~~

predatory

prepayment (and all other iterate forms of this term)

~~PriceWaterhouse Coopers (and all other iterate forms of this term)~~

private label

privilege period

~~profit (and all other iterate forms of this term)~~

prohibited sales practices

~~projection (and all other iterate forms of this term)~~

PWC

~~qae (and all other iterate forms of this term)~~

quarterly reports

rapid response team

rating (and all other iterate forms of this term)

re age (and all other iterate forms of this term)

re write (and all other iterate forms of this term)

Real estate owned

~~real estate settlement procedures act~~

receivables

recidivism

~~reconciliation (and all other iterate forms of this term)~~

~~refinance (and all other iterate forms of this term)~~

regional managers

regulation x

regulation z

Renaissance

REO

~~report (and all other iterate forms of this term)~~

~~repurchase (and all other iterate forms of this term)~~

re-reage

rescission

reserve (and all other iterate forms of this term)

~~reset (and all other iterate forms of this term)~~

respa

restatement (and all other iterate forms of this term)

restructure (and all other iterate forms of this term)

~~retention (and all other iterate forms of this term)~~

~~retribution (and all other iterate forms of this term)~~

Revenue

~~revision (and all other iterate forms of this term)~~

~~reward (and all other iterate forms of this term)~~

~~rewrites (and all other iterate forms of this term)~~

Rhannon

Richards

Riek

right rewards

risk

Robin

Rod

rogue  
roll rates (and all other iterate forms of this term)  
Ron  
Ruiz  
run rates (and all other iterate forms of this term)  
Rutland  
Rybak  
S&P (and all other iterate forms of this term)  
Sam  
Sarbanes Oxley (and all other iterate forms of this term)  
seam  
scapegoat  
scheme  
Schneider  
Schoenholz  
Schwager  
Scott  
script (and all other iterate forms of this term)  
serum  
SEC  
securitization (and all other iterate forms of this term)  
security (and all other iterate forms of this term)  
self-serving (and all other iterate forms of this term)  
senior credit risk update meeting  
senior management  
settlement (and all other iterate forms of this term)  
sfas  
Sharon  
Sharovsky  
shred (and all other iterate forms of this term)  
Shrum  
simple interest  
skip a pay (and all other iterate forms of this term)  
Smith  
Snyder  
Sodolka  
Sonenholz  
special  
spike (and all other iterate forms of this term)  
Sprude  
Stacey  
statement of financial accounting standard  
static  
Steve  
Steven  
Stevens  
Stewart  
stoe  
stock  
Stream  
structure (and all other iterate forms of this term)

~~subpoena (and all other iterate forms of this term)~~  
~~subprime (and all other iterate forms of this term)~~  
~~T chart (and all other iterate forms of this term)~~  
~~t presentation (and all other iterate forms of this term)~~  
~~t sale (and all other iterate forms of this term)~~  
tangible benefits  
Tanya  
target (and all other iterate forms of this term)  
~~t chart (and all other iterate forms of this term)~~  
TDR  
Terese  
Terry  
Texas  
Therese  
Thomas  
til  
tila  
Tom  
tracking (and all other iterate forms of this term)  
trainer (and all other iterate forms of this term)  
Transamerica  
trend (and all other iterate forms of this term)  
Troubled Debt Restructure  
truth in lending (and all other iterate forms of this term)  
turnover (and all other iterate forms of this term)  
unauthorized (and all other iterate forms of this term)  
uncollectable  
underwriting (and all other iterate forms of this term)  
Union Privilege  
unlawful  
up front (and all other iterate forms of this term)  
up selling (and all other iterate forms of this term)  
Uphoff  
vintage (and all other iterate forms of this term)  
Visa  
Vision  
void (and all other iterate forms of this term)  
volume  
Vozar  
Walsh  
Walt  
Washington  
Wehrenberg  
wfa  
whistleblower  
white knight  
William  
~~Wilmer Cutler (and all other iterate forms of this term)~~  
~~work papers (and all other iterate forms of this term)~~  
Werwa  
write down (and all other iterate forms of this term)



wte  
Zaljee  
zero

Document comparison done by DeltaView on Friday, March 18, 2005 15:39:13

<b>Input:</b>	
Document 1	pcdocs://cgrny1/690426/1
Document 2	pcdocs://cgrny1/690426/3
Rendering set	Standard

<b>Legend:</b>	
Insertion	
Deletion	
Moved from	
Moved to	
Style change	
Format change	
Moved-deletion	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

<b>Statistics:</b>	
	Count
Insertions	12
Deletions	413
Moved from	0
Moved to	0
Style change	0
Format changed	0
Total changes	425

**TAB 7**



SAN DIEGO • SAN FRANCISCO  
LOS ANGELES • NEW YORK • BOCA RATON  
WASHINGTON, DC • HOUSTON  
PHILADELPHIA • SEATTLE

Sylvia Sum  
sylvias@lerachlaw.com

March 24, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis:

I write in response to your March 18, 2005 letter and your proposals for the custodian list and search terms.

Plaintiffs cannot accept the Household Defendants' proposed search term list. Your list eliminates crucial and relevant terms that go to the gist of this case.

Plaintiffs have, however, considered your concerns regarding possible overbreadth and have modified the search term list accordingly. Enclosed is plaintiffs' revised search term list.

With respect to the custodians, plaintiffs insist that, in addition to the files (electronic or otherwise) of those individuals listed on Household's initial disclosure list, the files of Greg Gibson, Douglas Friedrich, Elaine Markell and Kenneth Gang be searched. The search results for Ms. Markell and Mr. Gang should be produced to plaintiffs at least five business days before their respective depositions are to take place, along with any responsive non-electronic documents from their files. With these additions, plaintiffs accept your proposal to discuss additional names of custodians after the conclusion of the mediation.

Very truly yours,

Sylvia Sum

SS:jc  
Enclosure

cc: Marvin A. Miller, Esq.  
Adam Deutsch, Esq.  
T:\Cases\SP\Household INT\Corres\LTR Best 3-24-05.doc

**List of Search Terms**

9/11  
10-K  
10-Q  
2+  
4 star  
4\*star  
8-K  
AA  
abuse (and all other iterate forms of this term)  
acceleration (and all other iterate forms of this term)  
accounting principle board  
accusation (and all other iterate forms of this term)  
ACORN  
advocates for responsible lending  
affinity  
AFL-CIO  
AG  
aging  
Aldinger  
allegation (and all other iterate forms of this term)  
amortization (and all other iterate forms of this term)  
Andersen  
Archibald  
Association of Community Organizations for Reform Now  
attorney general  
attorneys general  
audit (and all other iterate forms of this term)  
auto reage  
automatic (and all other iterate forms of this term)  
automator  
back door (and all other iterate forms of this term)  
backdate (and all other iterate forms of this term)  
back-end (and all other iterate forms of this term)  
bank like (and all other iterate forms of this term)  
bankruptcy (and all other iterate forms of this term)  
baracuda  
Barron's  
Bellingham  
Belz  
Bernstein  
best practices  
bi monthly (and all other iterate forms of this term)  
Bianucci  
biweekly (and all other iterate forms of this term)  
bk  
blended rate  
board of directors  
bonus (and all other iterate forms of this term)  
Borchert  
Bowden

branch audit  
branch visit tracking system  
bucket (and all other iterate forms of this term)  
Bullard  
buy down (and all other iterate forms of this term)  
bvts  
Cahill  
Callahan  
champion challenger  
chapter 13  
chapter 7  
charge off (and all other iterate forms of this term)  
Cheronis  
Chrizpiuo  
Chuck Cross  
clean desk policy  
closed ended (and all other iterate forms of this term)  
co-brand (and all other iterate forms of this term)  
collection (and all other iterate forms of this term)  
comparable rate  
comparative rate  
complaint  
comply (and all other iterate forms of this term)  
comprehensive audit  
confusion (and all other iterate forms of this term)  
Connaughton  
consent decree  
counter  
Cunningham  
DAS  
defer  
delay codes  
delinquency (and all other iterate forms of this term)  
Department of Financial Institutions  
destruction (and all other iterate forms of this term)  
Detelich  
DFI  
directive discharge (and all other iterate forms of this term)  
disclosure (and all other iterate forms of this term)  
discount points  
Drury  
earnings per share (and all other iterate forms of this term)  
effective interest rate  
elit  
equivalent interest rate  
erisa lawsuit (and all other iterate forms of this term)  
extension (and all other iterate forms of this term)  
EZ Pay  
fascon  
Feeney  
financial relations conference  
financial statements

Fitch  
flag  
flush  
Forbes  
forebearance (and all other iterate forms of this term)  
foreclosure (and all other iterate forms of this term)  
four star  
fraud (and all other iterate forms of this term)  
Friedrich  
front-end (and all other iterate forms of this term)  
GAAP  
GAAS  
Garwall  
generally accepted accounting principles  
generally accepted auditing standards  
gfe  
Gilmer  
gm  
Goldman  
good faith estimate  
Gorrell  
Gregoire  
Gunderson  
Hayden  
headline (and all other iterate forms of this term)  
Hedges  
Hicks  
Hills  
HIP  
hip pocket  
hoepa  
Hoey  
Hoff  
holp  
home owners loan proposal  
Household Initiated Payment  
Hueman  
Huey  
Huggins  
ICP  
illegal  
incentive (and all other iterate forms of this term)  
incentivize  
injunction (and all other iterate forms of this term)  
integrity  
interest short  
investigation (and all other iterate forms of this term)  
Janeway  
Keckman  
Kessler  
KPMG  
Kuipers

Kustenda  
Kwidzinski  
lawsuit  
Lechtenberg  
legendary performers  
life insurance  
litigation  
Littler  
LTV  
Luisi  
Luna  
Makowski  
manipulation (and all other iterate forms of this term)  
Markell  
mastercard  
MBO  
McClayton  
McCormick  
McDonald  
McGrane  
Mehta  
Merrill  
mischaracterization (and all other iterate forms of this term)  
misrepresentation (and all other iterate forms of this term)  
Mizialko  
modification (and all other iterate forms of this term)  
Monique  
Moody's  
Moravy  
multi state (and all other iterate forms of this term)  
Musil  
natural disaster (and all other iterate forms of this term)  
net interest margin  
nim  
nomura (and all other iterate forms of this term)  
OCC  
open ended (and all other iterate forms of this term)  
OTS  
overappraised (and all other iterate forms of this term)  
Overstreet  
Pantelis  
Parlette  
pay down (and all other iterate forms of this term)  
pay right rewards  
Peteren  
piggyback (and all other iterate forms of this term)  
Plack  
Potter  
PPP  
predatory  
prepayment (and all other iterate forms of this term)  
PriceWaterhouse Coopers (and all other iterate forms of this term)



prohibited sales practices  
PWC  
qac (and all other iterate forms of this term)  
quarterly reports  
rapid response team  
rating (and all other iterate forms of this term)  
re age (and all other iterate forms of this term)  
re write (and all other iterate forms of this term)  
Real estate owned  
recidivism  
REO  
re-reage  
rescission  
reserve (and all other iterate forms of this term)  
reset (and all other iterate forms of this term)  
restatement (and all other iterate forms of this term)  
restructure (and all other iterate forms of this term)  
retribution (and all other iterate forms of this term)  
revision (and all other iterate forms of this term)  
reward (and all other iterate forms of this term)  
rewrites (and all other iterate forms of this term)  
Rhainnon  
right rewards  
rogue  
roll rates (and all other iterate forms of this term)  
run rates (and all other iterate forms of this term)  
Rutland  
Rybak  
S&P (and all other iterate forms of this term)  
Sarbanes Oxley (and all other iterate forms of this term)  
scapegoat  
Schoenholz  
Schwager  
script (and all other iterate forms of this term)  
scrum  
SEC  
self serving (and all other iterate forms of this term)  
senior credit risk update meeting  
senior management  
settlement (and all other iterate forms of this term)  
sfas  
Shrarovsky  
shred (and all other iterate forms of this term)  
Shrum  
simple interest  
skip a pay (and all other iterate forms of this term)  
Sodelka  
Sonenthol  
Sprude  
stoc  
Stream  
subpoena (and all other iterate forms of this term)

T chart (and all other iterate forms of this term)  
t presentation (and all other iterate forms of this term)  
t sale (and all other iterate forms of this term)  
tangible benefits  
t-chart (and all other iterate forms of this term)  
TDR  
trainer (and all other iterate forms of this term)  
Troubled Debt Restructure  
unauthorized (and all other iterate forms of this term)  
Union Privilege  
unlawful  
up selling (and all other iterate forms of this term)  
Uphoff  
Visa  
Vision  
Vozar  
Wehrenberg  
wfa  
whistleblower  
white knight  
Wilmer Cutler (and all other iterate forms of this term)  
Worwa  
write-down (and all other iterate forms of this term)  
wtc  
Zaljco



# **TAB 8**

CAHILL GORDON & REINDEL LLP  
EIGHTY PINE STREET  
NEW YORK, N.Y. 10005-1702

FLOYD ABRAMS  
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LANDIS C. BEST  
GARY A. BROOKS  
SUSAN BUCKLEY  
KEVIN J. BURKE  
P. KEVIN CASTEL  
JAMES J. CLARK  
BENJAMIN J. COHEN  
CHRISTOPHER T. COX  
W. LESLIE DUFFY  
RICHARD E. FARLEY  
PATRICIA FARREN  
JOAN MURTAGH FRANKEL  
BART FRIEDMAN  
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WILLIAM B. GANNETT

CHARLES A. GILMAN  
STEPHEN A. GREENE  
ROBERT M. HALLMAN  
WILLIAM M. HARTNETT  
CRAIG M. HOROWITZ  
DAVID G. JANUSZEWSKI  
THOMAS J. KAVALER  
LAWRENCE A. KOBRIN  
IMMANUEL KOHN  
EDWARD P. KRUGMAN  
GEOFFREY E. LIEBMANN  
MICHAEL MACRIS  
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COUNSEL  
CORYDON B. DUNHAM  
PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

April 15, 2005

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. (No. 02-CV-5893)

Dear Monique:

I write to follow up on our telephonic meet and confer held this past Tuesday in connection with the parties' ongoing efforts to reach agreement on an e-mail search term protocol.

After consideration, the Household Defendants cannot accept your compromise proposal of using Household's suggested list of search terms prior to the mediation, with plaintiffs' reserving the right to revisit the issue after the mediation (if necessary). We believe the issue should be resolved so that Household is not faced with the possible situation of multiple searches of the same mailboxes.

Based on the views that you expressed during the meet and confer, the Household Defendants have again reconsidered their position and enclose a revised version of the search term proposal. You will note that we have added more than 40 terms to the proposal, including the last names of those individuals listed in section I.A of defendant Arthur Andersen's Initial Disclosures, in which plaintiffs have expressed particular interest.

We again believe that the enclosed search term proposal more than adequately covers the key areas in this matter. Please advise as to whether the Household Defendants should begin collection pursuant to the attached list, or whether you would like to discuss further.

Sincerely,

  
Landis C. Best

CAHILL GORDON & REINDEL LLP

-2-

Monique C. Winkler, Esq.  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

cc: Adam Deutsch, Esq.  
Marvin Miller, Esq.  
Stanley Parzen, Esq.

### List of Search Terms

10-K  
10-Q  
2+  
4 star  
4\*star  
8-K  
AA  
accounting principle board  
ACORN  
advocates for responsible lending  
affinity  
AFL-CIO  
AG  
Aldinger  
Andersen  
Archibald  
Association of Community Organizations for Reform Now  
attorney general  
attorneys general  
audit (and all other iterate forms of this term)  
auto reage  
automator  
back door (and all other iterate forms of this term)  
back-end (and all other iterate forms of this term)  
bank like (and all other iterate forms of this term)  
bankruptcy (and all other iterate forms of this term)  
Barron's  
Bellingham  
Belz  
best practices  
bi monthly (and all other iterate forms of this term)  
Bianucci  
bi weekly (and all other iterate forms of this term)  
bk  
blended rate  
board of directors  
Bowden  
branch audit  
branch visit tracking system  
bucket (and all other iterate forms of this term)  
Bullard  
buy down (and all other iterate forms of this term)  
bvts  
Callahan  
champion challenger  
chapter 13  
chapter 7

charge off (and all other iterate forms of this term)  
Cheronis  
Crizpiuo  
closed ended (and all other iterate forms of this term)  
co-brand (and all other iterate forms of this term)  
collection (and all other iterate forms of this term)  
comparable rate  
comparative rate  
comprehensive audit  
consent decree  
DAS  
defer  
delay codes  
delinquency (and all other iterate forms of this term)  
Department of Financial Institutions  
DFI  
disclosure (and all other iterate forms of this term)  
discount points  
earnings per share (and all other iterate forms of this term)  
effective interest rate  
equivalent interest rate  
extension (and all other iterate forms of this term)  
EZ Pay  
Feeney  
financial relations conference  
Fitch  
Forbes  
forebearance (and all other iterate forms of this term)  
foreclosure (and all other iterate forms of this term)  
four star  
fraud (and all other iterate forms of this term)  
front-end (and all other iterate forms of this term)  
GAAP  
GAAS  
Garwall  
generally accepted accounting principles  
generally accepted auditing standards  
gfe  
Gilmer  
gm  
good faith estimate  
Gorrell  
Gunderson  
Hayden  
Hedges  
Hills  
hip pocket  
hoepa  
Hoey  
holp



home owners loan proposal  
Huggins  
ICP  
illegal  
incentive (and all other iterate forms of this term)  
incentivize  
investigation (and all other iterate forms of this term)  
Janeway  
Keckman  
Kessler  
KPMG  
Kuipers  
Kustenda  
Lechtenberg  
legendary performers  
LTV  
Luisi  
Luna  
Markell  
mastercard  
MBO  
McClayton  
McCormick  
McGrane  
misrepresentation (and all other iterate forms of this term)  
modification (and all other iterate forms of this term)  
Moody's  
Moravy  
multi state (and all other iterate forms of this term)  
Musil  
net interest margin  
nim  
OCC  
open ended (and all other iterate forms of this term)  
OTS  
pay down (and all other iterate forms of this term)  
pay right rewards  
Peteren  
piggyback (and all other iterate forms of this term)  
Plack  
Potter  
PPP  
predatory  
prepayment (and all other iterate forms of this term)  
prohibited sales practices  
qac (and all other iterate forms of this term)  
rapid response team  
rating (and all other iterate forms of this term)  
re age (and all other iterate forms of this term)  
re write (and all other iterate forms of this term)

Real estate owned  
recidivism  
REO  
re-reage  
rescission  
reserve (and all other iterate forms of this term)  
reset (and all other iterate forms of this term)  
restatement (and all other iterate forms of this term)  
restructure (and all other iterate forms of this term)  
right rewards  
rogue  
roll rates (and all other iterate forms of this term)  
run rates (and all other iterate forms of this term)  
S&P (and all other iterate forms of this term)  
Schoenholz  
Schwager  
script (and all other iterate forms of this term)  
scrum  
SEC  
senior credit risk update meeting  
senior management  
sfas  
Shrarovsky  
skip a pay (and all other iterate forms of this term)  
Sonenthol  
stoc  
Stroom  
tangible benefits  
TDR  
Troubled Debt Restructure  
Union Privilege  
unlawful  
up selling (and all other iterate forms of this term)  
Visa  
Vision  
Vozar  
Wehrenberg  
wfa  
whistleblower

# **TAB 9**



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PHILADELPHIA • SEATTLE

Monique C. Winkler  
MoniqueW@lerachlaw.com

April 19, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis:

As Sylvia Sum and I explained during the April 12, 2005 telephonic meet and confer, plaintiffs cannot accept a further narrowing of plaintiffs' proposed search term list. Given the parties' respective positions and in light of the fact that negotiations regarding native format production have now been drawn out for more than four months, further meet and confer efforts would be unproductive. Following the Court's guidance at the March 8, 2005 status conference, plaintiffs will move to compel native format production of documents responsive to both of plaintiffs' outstanding document requests following the mediation.

Very truly yours,

Monique C. Winkler

MCW:mm

cc: Marvin A. Miller, Esq.  
Adam Deutsch, Esq.

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**LERACH  
COUGHLIN  
STOIA  
GELLER  
RUDMAN  
& ROBBINS LLP**

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## FACSIMILE

		<u>Fax No.</u>	<u>Telephone No.</u>
<b>To:</b>	Landis Best, Esq. CAHILL GORDON & REINDEL LLP	212/269-5420	212-701-3000
<b>cc:</b>	Adam B. Deutsch, Esq. EIMER STAHL KLEVORN & SOLBERG LLP	312-692-1718	312-660-7600
	Marvin A. Miller, Esq. MILLER FAUCHER AND CAFFERTY LLP	312-782-4485	312-782-4880

<b>From:</b>	Monique C. Winkler	<b>Date:</b>	April 19, 2005
<b>Case Code:</b>	020377-00001	<b>Time:</b>	
<b>Subject:</b>	Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. Ill.)		

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# **TAB 10**

**UNITED STATES DISTRICT COURT  
FOR THE Northern District of Illinois – CM/ECF LIVE, Ver 2.4  
Eastern Division**

Lawrence E Jaffe, et al.

Plaintiff,

v.

Case No.: 1:02-cv-05893

Hon. Ronald A. Guzman

Household International Inc., et al.

Defendant.

---

**NOTIFICATION OF DOCKET ENTRY**

This docket entry was made by the Clerk on Friday, June 10, 2005:

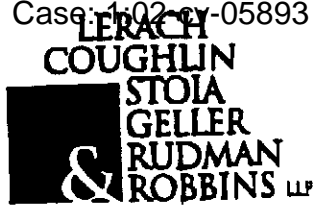
MINUTE entry before Judge Nan R. Nolan :Motion hearing held on 6/9/2005 regarding plaintiffs' motion to compel the Household defendants to produce documents improperly withheld on the basis of privilege; plaintiffs' motion to compel the Household defendants to produce source logs for documents produced in this litigation; and plaintiffs' motion to compel the Household defendants to produce electronic evidence in native electronic format. Parties are ordered to meet and confer to try and resolve some of the issues. Responses to the above listed motions are due by 6/30/2005; replies are due by 7/14/2005. Motion Hearing set for 8/11/2005 at 10:00 AM. Judicial staff mailed notice(hmb, )

**ATTENTION:** This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

For scheduled events, motion practices, recent opinions and other information, visit our web site at [www.ilnd.uscourts.gov](http://www.ilnd.uscourts.gov).

# **TAB 11**





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PHILADELPHIA • SEATTLE

Monique C. Winkler  
moniquew@lerachlaw.com

June 20, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis;

I write regarding the June 16, 2005 meet and confer on the native format motion to compel. First, I want to reiterate plaintiffs' frustration with the conduct of certain defense counsel during the meet and confer. Neither yelling nor mockery is a productive means by which to reach agreement, and plaintiffs will not countenance such conduct.

The Household Defendants expressed their willingness to abide by the protocol agreed upon by the parties prior to their disagreement on the final terms of the Household Defendants' native format production. Although over three months have elapsed since that time and the Household Defendants have not produced a single spreadsheet or other document in native format, the Household Defendants maintain that they have been diligently working toward the production of spreadsheets in native format and are willing to begin production prior to the resolution of the custodian list and search term issues. In light of the Household Defendants' assurances, plaintiffs agree to the protocol for the production of spreadsheets memorialized in the parties March 10, 2005 correspondence.

Regarding the custodian list proposed by plaintiffs, the Household Defendants disagreed with plaintiffs' proposed list. Plaintiffs explained that the number of names on the list was reasonable in light of the fact that Household's employees numbered in the tens of thousands, the length of the Class Period, and the complexity of the issues in the case. Plaintiffs also explained that the names were carefully selected based upon a review of the documents produced through March 1, 2005. Plaintiffs requested that the Household Defendants inform plaintiffs of those individuals on the custodian list that the Household Defendants believe do not belong on the list and specific reasons why. The Household Defendants refuse to give specific reasons why certain custodians should be struck from the



Landis Best, Esq.  
June 20, 2005  
Page 2

list other than that defense counsel "has not even heard of them." The Household Defendants believe that the number is too high and that the custodian list should include only the names from the initial disclosures, the Household Defendants' source log produced on June 17, 2005, and several other individuals upon whom the parties had previously agreed. The Household Defendants are willing to conduct a second search if additional custodian names are discovered and agreed upon by the parties. For the reasons outlined above, absent specific reasons why an individual should be removed from the list, plaintiffs cannot agree to limit their custodian list to that proposed by the Household Defendants. Plaintiffs remain willing to entertain any substantive explanations as to why an individual should be removed from the list.

The Household Defendants indicated their belief that the search terms are duplicative, stating that the list includes more than one way to get at the same concept. The Household Defendants believe that a cost-benefit analysis does not make the list usable. The Household Defendants stated that they're willing to go through the last list proposed by plaintiffs and explain their objections. Plaintiffs requested that the Household Defendants do that in writing, and the Household Defendants then proposed that the parties do that simultaneously. Plaintiffs do not believe that this is reasonable. Plaintiffs previously attempted to explain the inclusion of certain terms on a meet and confer without constructive results. Plaintiffs have already put forth an extraordinary effort in preparing the search term list. Moreover, plaintiffs believe that any cost-benefit analysis must take into consideration the factors discussed previously in support of the length of the custodian list. As a compromise, plaintiffs are willing to agree to the revised search term list provided to the Household Defendants on March 24, 2005.

Regarding other outstanding issues, the Household Defendants agreed to produce a source log for their electronic production to the extent that the source is not evident from the documents. The Household Defendants are still considering plaintiffs' request for verification that production in response to plaintiffs' requests is complete and mediation before Judge Nolan.

Very truly yours,

A handwritten signature in black ink, appearing to read "Monique C. Winkler".

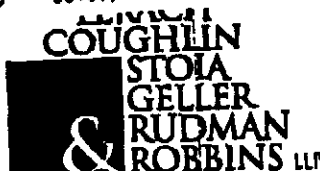
Monique C. Winkler

MCW:mog

cc: Marvin Miller, Esq.  
Adam Deutsch, Esq.

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03:07pm From



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**FACSIMILE**

		<u>Fax No.</u>	<u>Telephone No.</u>
<b>To:</b>	Landis Best, Esq. CAHILL GORDON & REINDEL LLP	212/269-5420	212-701-3000
<b>cc:</b>	Adam B. Deutsch, Esq. EIMER STAHL KLEVORN & SOLBERG LLP	312-692-1718	312-660-7600
	Marvin A. Miller, Esq. MILLER FAUCHER AND CAFFERTY LLP	312-782-4485	312-782-4880

<b>From:</b>	Monique C. Winkler	<b>Date:</b>	June 20, 2005
<b>Case Code:</b>	020377-00001	<b>Time:</b>	
<b>Subject:</b>	Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. Ill.)		

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PATRICIA FARREN  
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WRITER'S DIRECT NUMBER

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DANIEL J. ZUBKOFF

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WILLIAM T. LIFLAND  
DENIS MCINERNEY  
MATHIAS E. MONE  
IRWIN SCHNEIDERMAN  
JOHN R. VAUGHAN  
GARY W. WOLF

COUNSEL  
CORYDON B. DUNHAM  
PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

June 22, 2005

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. (02-CV-5893) (N.D.Ill.)

Dear Monique:

I write in response to your June 20 letter to Landis Best regarding the parties' June 16 meet and confer relating to native format discovery and other issues.

As you know, all parties attempted to resolve this case through mediation before the Honorable Layn Phillips. We traveled to California to do so at the end of May. Household is not prepared to mediate this case a second time given what we understand to be the positions of Plaintiffs, including, *inter alia*, plaintiffs' letter of June 14 stating that controlling 7th Circuit precedent is "wrongly decided" on the issue of how long the class period runs.

We also do not intend to respond to your "frustration", other than to urge you and your colleagues to adhere to the standards of civility that should govern the dealings between lawyers.

With regard to the list of individuals' mailboxes to be searched, we urge you to agree to spend as much time on the phone as necessary going over each name on your custodian list and exchanging views why that person should or should not be on the list. We believe that is what Judge Nolan had in mind, and we intend to abide by her directives in that regard.

With respect to the "search term" list to be used to identify potentially responsive emails, we urge you to agree to spend as much time on the phone as necessary going over each disputed term and exchanging views as to why the term should or should not be on the list. We believe that is what Judge Nolan had in mind, and we intend to abide by her directives.

Kindly advise what day and time you wish to have the call to discuss the individuals to be searched and the search terms and we will accommodate you to the extent we can.

CAHILL GORDON & REINDEL LLP

-2-

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Owen', with a horizontal line extending to the right.

David Owen

Monique C. Winkler, Esq.  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

cc: Landis C. Best, Esq.  
Marvin Miller, Esq.  
Adam Deutsch, Esq.  
Stanley Parzen, Esq.

# **TAB 13**



SAN DIEGO • SAN FRANCISCO  
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WASHINGTON, DC • HOUSTON  
PHILADELPHIA • SEATTLE

Azra Z. Mehdi  
azram@lerachlaw.com

June 22, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill.)

Landis:

Plaintiffs have reviewed the log you provided on June 17, 2005. Plaintiffs cannot withdraw their Motion to Compel Production of Source Logs because:

1. The June 17, 2005 source log has significant deficiencies;
2. The Household Defendants have not given plaintiffs a definite answer whether they will provide source logs for document production going forward; and
3. The Household Defendants have not yet told plaintiffs if they will verify completion of document production.

The deficiencies in the June 17, 2005 log are as follows:

1. In the *Erisa* litigation, Household was ordered to produce an index of the documents produced to the SEC and any document index provided to the state regulators. See Declaration of Luke O. Brooks in Support of Lead Plaintiffs' Motion to Compel the Household Defendants to Produce Source Logs for Documents Produced in This Litigation, Exhibit 1. The June 17, 2005 log simply lists numerous entries as documents produced to the SEC or in the *Erisa* litigation rather than providing plaintiffs here with the pre-existing index produced to the *Erisa* plaintiffs.

2. Documents HHS 02129843-02130016 and HHS 03062400-03062429 are listed as "Publicly Available Documents received from Milbank Tweed." Yet, both sets of documents are marked "Confidential." HHS 02129843-02130016 appear to be Vision-related documents. The Household Defendants have taken a hard-line position relating to the confidentiality of Vision documents which is inconsistent with the designation of these documents as "publicly





Landis Best, Esq.  
June 22, 2005  
Page 2

available" in the log. Similarly, HHS 03062400-03062429 are Forms 4 and 5 marked "confidential" on the documents.

3. You list multiple sources for the following documents:

(a) HHS 02429447-02429456 and HHS 02764359-02765291 – The log indicates the source to be both Household Legal Department and Outside Counsel;

(b) HHS 03050081-03055080 – The log indicates the source to be Credit Card Services – Executive Management Administration, including Margaret Sprude; and

(c) HHS 0372256 - 03073205 – The log indicates the source to be Auto Financial Planning, including Joan Copenrath.

Please designate more precisely the source of these documents.

4. Is there a department called "Consumer Lending Training"? If yes, is that the complete name of the department?

5. Finally, the log lists 64 individual custodians. Yet during the May 20, 2005 meet and confer, you represented that you had searched the files of over 110 individuals. Further, during the June 14, 2005 meet and confer, you stated that you searched the files of over 120 individuals. Yet, you only list 64 custodians in the June 17, 2005 chart. Please explain this discrepancy.

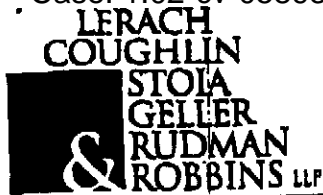
Please advise if the Household Defendants will revise this log to correct the deficiencies and address other issues raised in the motion.

Very truly yours,

Azra Z. Mehdi

AZM:mog

cc: Marvin Miller, Esq.  
Adam Deutsch, Esq.



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		<u>Fax No.</u>	<u>Telephone No.</u>
<b>To:</b>	Landis Best, Esq. Cahill Gordon & Reindel LLP	212/269-5420	212/701-3000
<b>cc:</b>	Marvin A. Miller, Esq. Miller Faucher And Cafferty LLP	312-782-4485	312-782-4880
	Adam B. Deutsch, Esq. Eimer Stahl Klevorn & Solberg LLP	312-692-1718	312-660-7600

<b>From:</b>	Azra Z. Mehdi	<b>Date:</b>	June 22, 2005
<b>Case Code:</b>	020377-00001		
<b>Subject:</b>	Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. Ill.)		

**Message/Document(s) faxed:**

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# **TAB 14**

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JASON W. KAPLAN

June 23, 2005

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. (02-CV-5893) (N.D.Ill.)

Dear Azra:

This responds to your June 22, 2005 letter to Landis Best. As your letter makes clear, if plaintiffs had continued the dialogue we were having on this issue before filing the motion you now refuse to withdraw, the burden on the Court of addressing the issue would have been greatly reduced since the issues in dispute have now been substantially narrowed. Nevertheless, as with the other two discovery motions plaintiffs filed, we urge you to agree to spend as much time on the phone as necessary going over each of your concerns regarding the production log and exchanging views concerning the purported deficiencies you say exist. We believe that is what Judge Nolan had in mind, and we intend to abide by her directives in that regard. Kindly advise us of a proposed date for that call.

We also note our request that plaintiffs agree to extend the time to respond to the 3 discovery motions you filed in order to continue the dialogue and to attempt to eliminate or narrow any remaining areas in dispute. We intend to contact the court later today in light of the impending deadlines and will so advise the court of your position, if you would kindly tell us what it is, at that time.

Sincerely,



David Owen

CAHILL GORDON & REINDEL LLP

-2-

Azra Z. Mehdi, Esq.  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

cc: Landis C. Best, Esq.  
Marvin Miller, Esq.  
Adam Deutsch, Esq.  
Stanley Parzen, Esq.

# **TAB 15**



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Monique C. Winkler  
moniquew@lerachlaw.com

June 28, 2005

VIA FACSIMILE

Landis Best, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis:

This letter is in response to David Owen's letters of June 22 and 23, 2005 which were not received by plaintiffs until June 27 and 28, 2005 respectively and your June 27, 2005 e-mail.

Mr. Owen's letters do nothing to further the meet and confer effort and are simply posturing on the part of defendants. As directed by Magistrate Judge Nolan, plaintiffs have communicated to defendants both verbally and in writing plaintiffs' position with respect to various issues. For example, on the native format issue, plaintiffs have advised defendants of the rationale underlying the selection of the names on the custodian list and the search terms. With respect to the source log, plaintiffs detailed in writing via letter dated June 22, 2005 their objections to the source log provided to plaintiffs on June 17, 2005.

Defendants, on the other hand, appear unwilling to do the same – loosely using the concept of "meet and confers." Every time plaintiffs have asked for the basis of defendants' refusal to provide discovery, they are met with defendants' empty mantra that plaintiffs should spend "as much time on the phone as necessary." This would be productive if (1) defendants detailed in writing their objections, rather than constantly changing their positions as defendants have done thus far in this litigation; and (2) defendants came prepared to meet and confers. Judge Nolan clearly did not intend for the protracted delay that defendants have engaged in thus far, but rather that the parties would make a genuine effort to discuss objections and exchange information.

The disingenuous nature of Mr. Owen's communications is exemplified by the fact that prior to the plaintiffs' filing of the motions to compel, defendants unequivocally took the



Landis Best, Esq.  
June 28, 2005  
Page 2

position that they would not produce source logs. See, e.g., Exs. 3 and 8 to the June 6, 2005 Declaration of Luke. O. Brooks. Indeed, you advised plaintiffs during at least three separate meet and confers, including one conducted on May 20, 2005, that defendants would not produce source logs. It was in light of defendants' adamant refusal to provide source logs that plaintiffs filed their motion to compel. Any narrowing of the issues could have been done by defendants well before the motion was filed after over a year of meet and confers.

In addition, Mr. Owen's allusion to the standards of civility is nothing short of ridiculous. As plaintiffs have advised defendants numerous times in the past, plaintiffs are more than willing to have the meet and confers recorded. Please let us know if your position has changed.

Please provide plaintiffs in writing with the basis for defendants' objections to the custodian list and the search term list and defendants' response to the questions raised in Azra Mehdi's June 22, 2005 letter relating to the source log. We would like to schedule a meet and confer once we have received defendants' responses.

Very truly yours,

A handwritten signature in black ink, appearing to read "Monique C. Winkler".

Monique C. Winkler

MCW:mm

cc: Marvin Miller, Esq.  
Adam Deutsch, Esq.

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<b>To:</b>	Landis Best, Esq. CAHILL GORDON & REINDEL LLP	212/269-5420	212-701-3000
<b>cc:</b>	Adam B. Deutsch, Esq. EIMER STAHL KLEVORN & SOLBERG LLP	312-692-1718	312-660-7600
	Marvin A. Miller, Esq. MILLER FAUCHER AND CAFFERTY LLP	312-782-4485	312-782-4880

<b>From:</b>	Monique C. Winkler	<b>Date:</b>	June 28, 2005
<b>Case Code:</b>	020377-00001	<b>Time:</b>	
<b>Subject:</b>	Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. Ill.)		

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CORYDON B. DUNHAM  
PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

June 29, 2005

Re: Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. (02-CV-5893) (N.D.Ill.)

Dear Monique:

This responds to your June 28, 2005 letter to Landis Best, who is attending to a family medical emergency.

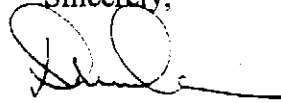
We believe that the purpose of the "meet and confer" conferences which Magistrate Judge Nolan directed us to engage in is to attempt to narrow issues that require court intervention in a simplified and straightforward way; i.e. an open exchange of views without the need for written "position papers" that necessarily prolong and bog down the process. Your refusal to meet and confer with us unless and until we provide in writing the basis for our objections to your custodian and search term lists is not in keeping with our understanding of what the Court expected. Notwithstanding this, in a further effort to avoid burdening the Court, we will provide you with a written explanation of our objections to your custodian and search term lists by the close of business tomorrow. We will also separately respond in writing to your questions about the production log we provided to you that were raised in Azra's June 22 letter. We accordingly request that you promptly agree to engage in a good faith discussion about paring down the terms and individuals on your lists on a schedule that permits us to timely respond to your multiple discovery motions on these subjects which are presently due next Thursday, or agree to extend our time to respond so that the Court's order can be effected. Let me know as soon as possible when you are available to meet and confer on these subjects.

The numerous personal attacks and mischaracterizations of communications contained in your letter are not appropriate or productive, and we again ask that you and your colleagues cease engaging in them.

CAHILL GORDON & REINDEL LLP

-2-

Sincerely,

A handwritten signature in black ink, appearing to read "David Owen", written over the word "Sincerely,".

David Owen

Monique C. Winkler, Esq.  
Lerach Coughlin Stoia Geller Rudman & Robbins LLP  
100 Pine St., 26th Floor  
San Francisco, CA 94111

VIA FACSIMILE

cc: Landis C. Best, Esq.  
Marvin Miller, Esq.  
Adam Deutsch, Esq.  
Stanley Parzen, Esq.

**TAB 17**

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PHILIP A. HEIMOWITZ  
JASON W. KAPLAN

June 30, 2005

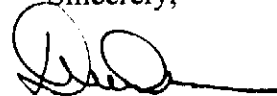
Re: Lawrence E. Jaffe Pension Plan v.  
Household International, Inc., et al.  
Case No. 02-CV-5893 (N.D.Ill.)

Dear Monique

In further response to your letter of June 28, 2005, enclosed please find two charts setting forth the Household Defendants' positions with respect to the search terms and custodian names as to which the parties are still in dispute.

In accordance with your promise to meet and confer, now that you have received the Household Defendants' responses please let us know as soon as possible when you will be available to discuss these issues. I again note that we require a schedule for such meet and confers that permits us to timely respond to your multiple discovery motions, which are presently due in less than one week, or an indication of your agreement to extend our time to respond so that the Court's order that the parties continue to meet and confer on these issues can be effected.

Sincerely,



David Owen

Monique C. Winkler, Esq.  
Lerach Coughlin Stoia Geller  
Rudman & Robbins LLP  
100 Pine Street, 26th Floor  
San Francisco, CA 94111

CAHILL GORDON & REINDEL LLP

-2-

VIA FACSIMILE

CAHILL GORDON & REINDEL LLP

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cc: Adam Deutsch, Esq. (via facsimile)  
Marvin A. Miller, Esq. (via facsimile)  
Thomas J. Kavalier, Esq.  
Peter Sloane, Esq.  
Landis C. Best, Esq.



## Search Terms Currently in Dispute

TERM	RESPONSE
1. 9/11	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Furthermore, this term would capture all references, regardless of context, to "9/11," including, for example, references to the 9/11 terrorist attacks (likely including many personal emails) and any other reference to the date 9/11 in years other than 2001, the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would be captured by search terms such as "reage," "restructure," and "extension," terms which the parties have already agreed will be searched.
2. abuse (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
3. acceleration (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "acceleration," including its many uses in connection with the loan terms of any of Household's more than 50 million customer accounts active during the Class Period, the majority of which would likely be unrelated to any of plaintiffs' claims.
4. accusation (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "accusation," including, for example, references to accusations made by and against the Company and its subsidiaries in the more than 100 litigations, unrelated to the dispute between the parties, that were active at Household during the Class Period.
5. aging	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
6. allegation (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "allegation" including, for example, references to allegations made by and against the Company and its subsidiaries in the more than 100 litigations, unrelated to the dispute between the parties, that were active at Household during the Class Period.

-2-

<b>TERM</b>	<b>RESPONSE</b>
7. amortization (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "amortization," including its many uses in connection with the repayment schedules of loans for any of Household's more than 50 million customer accounts active during the Class Period, amortization of goodwill, and amortization of properties and equipment, the majority of which would likely be unrelated to any of plaintiffs' claims.
8. automatic (and all other iterate forms of this term)	The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.
9. backdate (and all other iterate forms of this term)	The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.
10. baracuda	The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.
11. Bernstein	The term Bernstein would capture all references, regardless of context, to anyone, including Household employees, with the common name Bernstein, the majority of which would be unrelated to any of plaintiffs' claims. Furthermore, all emails that include Bernstein in their signature block would be captured by this term.
12. bonus (and all other iterate forms of this term)	The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.
13. Borchert	The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.

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	<b>TERM</b>	<b>RESPONSE</b>
14.	Cahill	This term would capture all references, regardless of context, to "Cahill," including, for example, references to Cahill Gordon & Reindel LLP, which has advised and/or acted as counsel for the Company and/or Individual Defendants regarding numerous matters unrelated to any of plaintiffs' claims as well as references to anyone with the name Cahill, the majority of which would likely be unrelated to any of plaintiffs' claims.
15.	Chuck Cross	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
16.	clean desk policy	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
17.	complaint	This term would capture all references, regardless of context, to "complaint," including, for example, references to allegations made by and against the Company and its subsidiaries in the more than 100 litigations, unrelated to the dispute between the parties, that were active at Household during the Class Period.
18.	comply (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "comply," including, for example, references to compliance with regulatory guidance or compliance with various accounting standards, the majority of which would likely be unrelated to any of plaintiffs' claims.
19.	confusion (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>

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	<b>TERM</b>	<b>RESPONSE</b>
20.	Connaughton	<p>This term would capture all references, regardless of context, to "Connaughton," including references to an employee of the Company, James Connaughton, as well as any emails that include Connaughton's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Connaughton appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Connaughton's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
21.	counter	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>
22.	Cunningham	<p>This term would capture all references, regardless of context, to "Cunningham," including references to anyone with the common name Cunningham, of which there was more than one at Household, as well as any emails that include a Cunningham's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Curt Cunningham, one employee with this name, appears on the Household Defendants' production log, the parties have agreed that Curt Cunningham's email box will be searched and responsive, non-privileged documents will be produced to plaintiffs; accordingly, there is no need to include this term.</p>
23.	destruction (and all other iterate forms of this term)	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>

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TERM	RESPONSE
24. Detelich	<p>This term would capture all references, regardless of context, to "Detelich," including references to an employee of the Company, Thomas Detelich, as well as any emails that include Detelich's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Detelich appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Detelich's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
25. directive discharge (and all other iterate forms of this term)	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>
26. Drury	<p>This term would capture all references, regardless of context, to "Drury," including references to a former employee of the Company, Melissa Rutland-Drury, as well as any emails that include Rutland-Drury's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would likely be captured by terms such as "Luna" and "Bellingham," both of which the parties have already agreed will be searched.</p> <p>Furthermore, the Household Defendants have already agreed that Rutland-Drury's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
27. EITF	<p>This term would capture all references, regardless of context, to "EITF," including, for example, references to the Emerging Issues Task Force, a unit of the Financial Accounting Standards Board which issues numerous statements on the subject of financial reporting, the majority of which would likely be unrelated to any of plaintiffs' claims.</p>
28. erisa lawsuit (and all other iterate forms of this term)	<p>As set forth in the Household Defendants' production log, the Household Defendants have already produced to plaintiffs more than 2.1 million pages of documents previously produced in the ERISA litigation — including many emails and other electronic documents; it is therefore likely that responsive documents would be duplicative of those already produced to plaintiffs in this case.</p>

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TERM	RESPONSE
29. fascon	This term would capture all references, regardless of context, to "fascon," including, for example, references to the FASB Statement of Concepts, or "FASCON," which provides guidance on numerous accounting issues relating to GAAP, the majority of which would likely be unrelated to any of plaintiffs' claims.
30. financial statements	This term would capture all references, regardless of context, to "financial statements," including, for example, references to the financial statements of any corporation, the majority of which would likely be unrelated to any of plaintiffs' claims. Relevant documents, if any, would likely be captured by search terms such as "10-K," "8-K," and "10-Q," terms which the parties have already agreed will be searched.
31. flag	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.
32. flush	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.
33. Friedrich	This term would capture all references, regardless of context, to "Friedrich," including references to an employee of the Company, Douglas Friedrich, as well as any emails that include Friedrich's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Moreover, because the parties have already agreed that Friedrich's email box will be searched and responsive, non-privileged documents produced to plaintiffs, accordingly, there is no need to include this term.
34. Goldman	This term would capture all references, regardless of context, to "Goldman," including, for example, references to the investment banking firm Goldman Sachs or to any individual with the common name Goldman, the majority of which would likely be unrelated to any of plaintiffs' claims.
35. Gregoire	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>

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	<b>TERM</b>	<b>RESPONSE</b>
36.	headline (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "headline," including, for example, references to any newspaper headline, the majority of which would likely be unrelated to any of plaintiffs' claims.
37.	Hicks	This term would capture all references, regardless of context, to "Hicks," including references to anyone with the common name Hicks, of which there was more than one at Household, as well as any emails that include a Hicks's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.
38.	HIP	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
39.	Hoff	This term would capture all references, regardless of context, to "Hoff," including references to an employee of the Company, Joseph Hoff, as well as any emails that include Hoff's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Moreover, because Hoff appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Hoff's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
40.	Household Initiated Payment	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
41.	Hueman	This term would capture all references, regardless of context, to "Hueman," including references to an employee of the Company, Dennis Hueman, as well as any emails that include Hueman's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.
42.	Huey	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>

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TERM	RESPONSE
43. injunction (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "injunction," including, for example, references to injunctions sought by and against the Company and its subsidiaries in the more than 100 litigations, unrelated to the dispute between the parties, active at Household during the Class Period.
44. integrity	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.
45. interest short	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
46. Kwidzinski	This term would capture all references, regardless of context, to "Kwidzinski," including references to an employee of the Company, Bruce Kwidzinski, as well as any emails that include Kwidzinski's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.
47. lawsuit	This term would capture all references, regardless of context, to "lawsuit" including, for example, references to the more than 100 lawsuits, unrelated to the dispute between the parties, brought by and against the Company and its subsidiaries during the Class Period.
48. life insurance	This term would capture all references, regardless of context, to "life insurance," including, for example, references to life insurance benefits offered to Household employees, the majority of which would likely be unrelated to plaintiffs' claims.
49. litigation	This term would capture all references, regardless of context, to "litigation," including, for example, references to the more than 100 litigations, unrelated to the dispute between the parties, brought by and against the Company and its subsidiaries during the Class Period.
50. Littler	This term would capture all references, regardless of context, to "Littler," including, for example, references to Littler Mendelson, which has advised and/or acted as counsel for the Company regarding matters unrelated to plaintiffs' claims. It would also capture references to anyone with the name Littler, the majority of which would likely be unrelated to any of plaintiffs' claims.



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TERM	RESPONSE
51. Makowski	<p>This term would capture all references, regardless of context, to "Makowski," including references to an employee of the Company, Paul Makowski, as well as any emails that include Makowski's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Makowski appears on the Household Defendants' Initial Disclosures, the parties have already agreed that Makowski's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
52. manipulation (and all other iterate forms of this term)	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>
53. McDonald	<p>This term would capture all references, regardless of context, to "McDonald," including references to an employee of the Company, Steven McDonald, as well as any emails that include McDonald's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because McDonald appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that McDonald's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
54. Mehta	<p>This term would capture all references, regardless of context, to "Mehta," including references to an employee of the Company, Siddharth (Bobby) Mehta, as well as any emails that include Mehta's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Mehta appears on the Household Defendants' production log, the parties have already agreed that Mehta's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
55. Merrill	<p>This term would capture all references, regardless of context, to "Merrill," including, for example, references to the investment banking firm Merrill Lynch or to any individual with the common name Merrill, the majority of which would likely be unrelated to any of plaintiffs' claims.</p>

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	<b>TERM</b>	<b>RESPONSE</b>
56.	mischaracterization (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
57.	Mizialko	This term would capture all references, regardless of context, to "Mizialko," including references to an employee of the Company, Clifford Mizialko, as well as any emails that include Mizialko's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Moreover, because Mizialko appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Mizialko's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
58.	Monique	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Furthermore, this term would capture all references, regardless of context, to any individual with the popular name Monique, the majority of which would be unrelated to any of plaintiffs' claims.
59.	natural disaster (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "natural disaster," including, for example, references to any natural disaster such as a hurricane, flood, or tornado, the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would likely be captured by search terms such as "reage," "restructure," and "extension," terms which the parties have already agreed will be searched.
60.	nomura (and all other iterate forms of this term)	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Furthermore, this term would capture all references, regardless of context, to "Nomura," including, for example, references to the securities firm Nomura, the majority of which would be unrelated to any of plaintiffs' claims.
61.	overappraised (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>

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	<b>TERM</b>	<b>RESPONSE</b>
62.	Overstreet	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
63.	Pantelis	This term would capture all references, regardless of context, to "Pantelis," including references to an employee of the Company, Daniel Pantelis, as well as any emails that include Pantelis's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Moreover, Pantelis appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Pantelis's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
64.	Parlette	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
65.	PriceWaterhouse-Coopers (and all other iterate forms of this term)	Because it bears no discernible connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Furthermore, this term would capture all references, regardless of context, to the accounting firm "PriceWaterhouseCoopers," the majority of which would be unrelated to any of plaintiffs' claims.
66.	PWC	See PriceWaterhouseCoopers, <i>supra</i> , No. 65.
67.	quarterly reports	This term would capture all references, regardless of context, to "quarterly reports," including, for example, references to the internal or public quarterly reports of any corporation, the majority of which would likely be unrelated to any of plaintiffs' claims. Relevant documents, if any, would likely be captured by "10-Q," a term which the parties have already agreed will be searched.
68.	reset (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>

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	<b>TERM</b>	<b>RESPONSE</b>
69.	retribution (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
70.	revision	This term would capture all references, regardless of context, to "revision," including, for example, references to revision of any document or draft, the majority of which would likely be unrelated to any of plaintiffs' claims.
71.	reward (and all other iterate forms of this term)	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Moreover, relevant documents, if any, would likely be captured by search terms such as "incentive," "incentivize," "MBO," and "restructure," terms which the parties have already agreed will be searched.
72.	Rhainnon	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
73.	Rutland	This term would capture all references, regardless of context, to "Rutland," including references to an employee of the Company, Melissa Rutland-Drury, as well as any emails that include Rutland-Drury's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would likely be captured by terms such as "Luna" and "Bel-lingham," both of which the parties have already agreed will be searched.  Furthermore, the Household Defendants have already agreed that Rutland-Drury's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
74.	Rybak	This term would capture all references, regardless of context, to "Rybak," including references to an employee of the Company, Walter Rybak, as well as any emails that include Rybak's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Moreover, because Rybak appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Rybak's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.

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	<b>TERM</b>	<b>RESPONSE</b>
75.	Sarbanes Oxley (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "Sarbanes Oxley," including, for example, references to the passage and implications of the Sarbanes Oxley law generally, the majority of which would likely be unrelated to any of plaintiffs' claims.
76.	Scapegoat	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
77.	self serving (and all other iterate forms of this term)	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.
78.	settlement (and all other iterate forms of this term)	This term would capture all references, regardless of context, to "settlement," including, for example, references to settlements in many of the more than 100 litigations, unrelated to the dispute between the parties, brought by and against the Company and its subsidiaries during the Class Period.
79.	shred (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
80.	Shrum	This term would capture all references, regardless of context, to "Shrum," including references to an employee of the Company, Jon Shrum, as well as any emails that include Shrum's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would likely be captured by terms such as "Luna" and "Bellingham," both of which the parties have already agreed will be searched.  Furthermore, the Household Defendants have already agreed that Shrum's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
81.	simple interest	This term would capture all references, regardless of context, to "simple interest," including its many uses in connection with the loan terms of any of Household's more than 50 million customer accounts active during the Class Period, the majority of which would likely be unrelated to any of plaintiffs' claims.

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<b>TERM</b>	<b>RESPONSE</b>
82. Sodeika	<p>This term would capture all references, regardless of context, to "Sodeika," including references to an employee of the Company, Lisa Sodeika, as well as any emails that include Sodeika's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Sodeika appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Sodeika's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
83. Sprude	<p>This term would capture all references, regardless of context, to "Sprude," including references to an employee of the Company, Margaret Sprude, as well as any emails that include Sprude's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Moreover, because Sprude appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Sprude's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
84. subpoena (and all other iterate forms of this term)	<p>This term would capture all references, regardless of context, to "subpoena," including, for example, references to subpoenas in the over 100 litigations, unrelated to the dispute between the parties, brought by and against the Company and its subsidiaries during the Class Period.</p>
85. T chart (and all other iterate forms of this term)	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>
86. T presentation (and all other iterate forms of this term)	<p>See T chart, <i>supra</i>, No. 85.</p>
87. T sale (and all other iterate forms of this term)	<p>See T chart, <i>supra</i>, No. 85.</p>

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	<b>TERM</b>	<b>RESPONSE</b>
88.	T-chart (and all other iterate forms of this term)	See T chart, <i>supra</i> , No. 85.
89.	trainer (and all other iterate forms of this term)	Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.
90.	unauthorized (and all other iterate forms of this term)	<b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b>
91.	Uphoff	This term would capture all references, regardless of context, to "Uphoff," including references to an employee of the Company, John Uphoff, as well as any emails that include Uphoff's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.  Further, because Uphoff appears on the Household Defendants' Initial Disclosures and on the Household Defendants' production log, the parties have already agreed that Uphoff's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.
92.	White knight	This term would capture all references, regardless of context, to "white knight," including, for example, references to the common financial term white knight, the majority of which would likely be unrelated to any of plaintiffs' claims.
93.	Wilmer Cutler (and all other iterate forms of this term)	This term would capture all references, regardless of context, to Wilmer Cutler & Pickering, which has advised and/or acted as counsel for the Company regarding matters unrelated to plaintiffs' claims.

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TERM	RESPONSE
94. Worwa	<p>This term would capture all references, regardless of context, to "Worwa," including references to an employee of the Company, Christine Worwa, as well as any emails that include Worwa's signature block, the majority of which would likely be unrelated to any of plaintiffs' claims.</p> <p>Further, because Worwa appears on the Household Defendants' production log, the parties have already agreed that Worwa's email box will be searched and responsive, non-privileged documents produced to plaintiffs; accordingly, there is no need to include this term.</p>
95. write-down (and all other iterate forms of this term)	<p><b>The Household Defendants are willing to compromise with respect to this term in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object.</b></p>
96. wtc	<p>Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence. Furthermore, this term would capture all references, regardless of context, to "wtc," including, for example, references to the 9/11 terrorist attacks on the World Trade Center (likely including many personal emails), the majority of which would likely be unrelated to any of plaintiffs' claims. Moreover, relevant documents, if any, would likely be captured by search terms such as "reage," "restructure," and "extension," terms which the parties have already agreed will be searched.</p>
97. Zaljco	<p>Because it bears no discernable connection to the dispute between the parties, this term is highly unlikely to lead to the discovery of relevant evidence.</p>



**Plaintiffs' Proposed Custodians**

	<b>CUSTODIAN</b>	<b>RESPONSE</b>
1.	Abanero, Jose T.	Mr. Abanero does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Uphoff, to whom Mr. Abanero reported.
2.	Adams, Gary M.	Mr. Adams does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
3.	Adams, Lisa L.	Ms. Adams does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailboxes of Chuck Colip and Lawrence Connell, to whom Ms. Adams reported.
4.	Aita, Marcelo A.	Mr. Aita does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Uphoff, to whom Mr. Aita reported.
5.	<b>Aldinger, William F.<sup>1</sup></b>	

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<sup>1</sup> The Household Defendants have already agreed to search the mailboxes of those custodians who appear in bold.

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CUSTODIAN	RESPONSE
6. Allcock, Robin L.	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
7. Allen, Cris	Mr. Allen does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
8. Ancona, Edgar D.	
9. Anderson, Aaron E.	Mr. Anderson does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
10. Anderson, Dan W.	
11. Andreuzzi, Paul	Mr. Andreuzzi does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
12. Apostol, George M.	Mr. Apostol was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
13. Armstrong, Michelle	Ms. Armstrong does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
14. Ashley, Scott R.	Mr. Ashley does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
15.	Aspiras, Jay Walter P.	Mr. Aspiras does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
16.	Azia, Arif (correct spelling of last name = Aziz)	Mr. Aziz does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
17.	Bales, Ronald K.	Mr. Bales does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Thomas Harmon, to whom Mr. Bales reported.
18.	Barnes, Elizabeth (Liz)	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
19.	<b>Basilotto, Stephen C.</b>	
20.	Batka, Jeffrey P.	Mr. Batka does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
21.	Biester, Michael R.	Mr. Biester does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Daniel Pantelis, to whom Mr. Biester reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
22.	Black, Donna L. aka Black-Schelonka, Donna L. aka Schelonka, Donna L.	Ms. Black does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Davis, to whom Ms. Black reported.
23.	Blenke, John W.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
24.	Bobola, Megan (also spelled Meaghan)	Ms. Bobola does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
25.	Boris, Larry P.	Mr. Boris does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Michael Marcus, to whom Mr. Boris reported.
26.	Bosson, Janine	Ms. Bosson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
27.	Bovington, Jason	Mr. Bovington was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
28.	Bowman, Kenneth P.	Mr. Bowman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
29.	Boyd, Nancy L.	Ms. Boyd does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
30.	Bransford, Jeffery S.	Mr. Bransford does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gregory Gibson, to whom Mr. Bransford reported.
31.	Brashier, Sandra	Ms. Brashier does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
32.	Brooke, Noelle	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
33.	Brown, Ron	Mr. Brown does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
34.	Brugato, Jeffrey A.	Mr. Brugato does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
35.	Buxbaum, Cathy	Ms. Buxbaum does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
36.	Carlson, Patricia A. or Carlson, Pat or Carlson, P.A.	Ms. Carlson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Joe Vozar, to whom Ms. Carlson reported.
37.	Cartier, Renee	Ms. Cartier does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
38.	Castelein, Craig L.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
39.	Caulfield, Ramon	The Household Defendants presume that plaintiffs intend to refer to Ramon Cofield, who is addressed below (see # 51).
40.	Chacon, Yyonne	Ms. Chacon does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Douglas Friedrich, to whom Ms. Chacon reported.
41.	Chadwick, Paisha	Ms. Chadwick does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
42.	Chan, Joseph K.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
43.	Chase-Gura, Lynda A.	Ms. Chase-Gura does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
44.	Chester, Pamela	Ms. Chester does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Christine Worwa, to whom Ms. Chester reported.
45.	Chow, Dan S.	Mr. Chow does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Davis, to whom Mr. Chow reported.
46.	Christian, Pamela H.	Ms. Christian does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
47.	Clarke, Lidney B.	Mr. Clarke does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
48.	Cleland, Mike	Mr. Cleland does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
49.	Clements, Jim A.	Mr. Clements does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Connaughton, to whom Mr. Clements reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
50.	Cliff, D.G.	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
51.	Cofield, Ramon	Mr. Cofield does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
52.	Coleman, Onya	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
53.	Colip, Chuck A.	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
54.	Condon, Tim R.	
55.	Condon, Tim R.	See # 54
56.	Connaughton, James F.	
57.	Connell, Lawrence	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
58.	Contino, Rick	Mr. Contino does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
59.	Coppenrath, Joan	



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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
60.	Corriher, David	Mr. Corriher does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
61.	Cota, Gina	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
62.	Cozza, Patrick A.	Mr. Cozza was an employee of divisions of Household with no discernable connection to the issues in dispute in this case.
63.	Cruz, John	Mr. Cruz does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
64.	<b>Cunningham, Curt</b>	
65.	Curse, Jeff (*correct spelling of last name = Cruse)	Mr. Cruse does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
66.	Cusenza, Rocco A.	Mr. Cusenza does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
67.	Custis, Robert M.	Mr. Custis does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
68.	Czerw, Carol	Ms. Czerw does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
69.	Dahlin, Thomas C.	Mr. Dahlin does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gary Harman, to whom Mr. Dahlin reported.
70.	Daskalakis, Christine	Ms. Daskalakis does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
71.	<b>Davis, John R.</b>	
72.	DeLuca, Michael	Mr. DeLuca was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
73.	<b>Derickson, Sandra (Sandy) L.</b>	
74.	<b>Detelich, Thomas M.</b>	
75.	Dibble, Parkes C.	Mr. Dibble does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Ken Harvey, to whom Mr. Dibble reported.
76.	Dominski, Thomas S.	Mr. Dominski does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
77.	Dougherty, Michael A.	
78.	Dunlap, Rafé B.	Mr. Dunlap does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Uphoff, to whom Mr. Dunlap reported.
79.	Eckert, Barbara L.	Ms. Eckert does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Cliff Mizialko, to whom Ms. Eckert reported.
80.	Echholdt, Per or Ekholdt, Per	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
81.	Eklund, Jonas	Mr. Eklund does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
82.	Emerson, Traci	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
83.	Esposito, Gary R.	Mr. Esposito does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Thomas Detelich, to whom Mr. Esposito reported.

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	<b>GUSTODIAN</b>	<b>RESPONSE</b>
84.	Evans, Sandra	Ms. Evans does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
85.	Fabiano, Rocco J.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
86.	Farrell, Diana S.	Ms. Farrell does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
87.	Fatina, David J.	Mr. Fatina does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Douglas Friedrich, to whom Mr. Fatina reported.
88.	Folia, Marianna	Ms. Folia does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
89.	Ford, Shawn	Mr. Ford does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
90.	Foster, Bruce A.	Mr. Foster does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Edgar Ancona, to whom Mr. Foster reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
91.	Francis, Jim	Mr. Francis does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
92.	Frantz, Jacob	Mr. Frantz does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
93.	<b>Friedrich, Douglas A.</b>	
94.	Fullen, Bernard	Mr. Fullen does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
95.	Gale, Lori	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
96.	<b>Gang, Kenneth K.</b>	
97.	Garcia, Anabelle	Ms. Garcia does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
98.	Garcia, Jorge	Mr. Garcia does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
99.	Gardner, Davin L.	Mr. Gardner does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
100.	Gargul, Elisa M.	Ms. Gargul does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Michael Skonning, to whom Ms. Gargul reported.
101.	Garland, Scott	Mr. Garland does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
102.	Genco, Lucille	Ms. Genco does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
103.	Gibbs, Anthony R.	Mr. Gibbs does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Kauffman, to whom Mr. Gibbs reported.
104.	<b>Gibson, Gregory A.</b>	
105.	Gillan-Myer, Maure (*correct spelling of first name = Maureen)	Ms. Gillan-Myer does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
106.	<b>Gilmer, Gary D.</b>	
107.	Goldstein, Eric	Mr. Goldstein does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
108.	Gordon, Gerard	Mr. Gordon does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
109.	Guglomo, Sasha	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
110.	Guy, Michelle L.	Ms. Guy does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
111.	Hamilton, John R.	Mr. Hamilton does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
112.	Hammersley, Bruce	Mr. Hammersley was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
113.	Handy, Catherine C.	Ms. Handy does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Per Ekholdt, to whom Ms. Handy reported.
114.	Hansgen, Beth	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
115.	<b>Harman, Gary S.</b>	

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
116.	Harmon, Thomas J.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
117.	Harris, Greg H.	Mr. Harris does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Joseph Hoff, to whom Mr. Harris reported.
<b>118.</b>	<b>Harvey, Ken</b>	
119.	Hawkins, Darryl	Mr. Hawkins does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
120.	Hayden, Megan E.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
121.	Haynes, Bob	Mr. Haynes was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
122.	Helm, Ewa	Ms. Helm does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
123.	Helmer, Charles (Chuck) J.	Mr. Helmer does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Chuck Colip, to whom Mr. Helmer reported.



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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
124.	Herman, Matt	Mr. Herman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
<b>125.</b>	<b>Hicks, Stephen L.</b>	
126.	Hill, Adrian	Mr. Hill was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
127.	Hinson, Thomas L.	Mr. Hinson does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
<b>128.</b>	<b>Hoff, Joseph W.</b>	
129.	Hopkins, James N.	Mr. Hopkins does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
130.	Hueman, Dennis J.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
131.	Ibrahim, Ashraf R.	Mr. Ibrahim does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
132.	Inman, Rick	Mr. Inman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
133.	Innis, Joe	Mr. Innis does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
134.	Jainette, Peter (*correct spelling of last name = Ji- anette)	Mr. Jianette does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
135.	Jebson, Alan	Mr. Jebson was not employed by the Company during the Class Period and thus would not be expected to have any documents relevant to plaintiffs' claims.
136.	Johnston, Andy	Mr. Johnston does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Uphoff, to whom Mr. Johnston reported.
137.	Johnston, Mary B.	Ms. Johnston does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Robin Allcock, to whom Ms. Johnston reported.
138.	Jones, Brad	Mr. Jones was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
139.	Jones, Terrell	Mr. Jones does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
140.	Joseph, Madline	Ms. Joseph does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
141.	Kaminski, Jadwiga	Ms. Kaminski does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Per Ekholdt, to whom Ms. Kaminski reported.
142.	Kasarda, Andrew G.	Mr. Kasarda does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
143.	<b>Kauffman, James B.</b>	
144.	Kelly, Colin P.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
145.	Kelly, Joe J.	Mr. Kelly does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Joan Coppenrath, to whom Mr. Kelly reported.
146.	Khan, Arif M.	Mr. Khan does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
147.	Kjoller, Gary	Mr. Kjoller does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
148.	Klein, Kenneth	Mr. Klein does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
149.	Klesse, Dick	Mr. Klesse does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Sandra Derickson, to whom Mr. Klesse reported. Additionally, the Household Defendants are willing to compromise and offer to search the files of Rocco Fabiano, to whom Mr. Klesse also reported.
150.	Knox, Deana C.	Ms. Knox does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
151.	Kong, Xiang	Mr. Kong does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Daniel Pantelis, to whom Mr. Kong reported.
152.	Krupowicz, Phil L.	Mr. Krupowicz does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Steven Smith, to whom Mr. Krupowicz reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
153.	Lawrence, Jim	Mr. Lawrence does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
154.	Lee, Jimmy S.	Mr. Lee does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
155.	Lenz, Lionel P.	Mr. Lenz does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Ken Harvey, to whom Mr. Lenz reported.
156.	Leopold, Mark F.	Mr. Leopold does not appear to have had a significant involvement with the issues presented in this case such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Ken Robin, to whom Mr. Leopold reported.
157.	Leski, Anita L.	Ms. Leski does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Thomas Harmon, to whom Ms. Leski reported.
158.	Leyba, Mark	Mr. Leyba does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
159.	Lin, Linda	Ms. Lin does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
160.	Little, David B.	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
161.	Littrell, Wayne	Mr. Littrell does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Per Ekholdt, to whom Mr. Littrell reported.
162.	Loots, Joseph G.	Mr. Loots does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Elaine Markell, to whom Mr. Loots reported.
163.	Lubiana, Walter	Mr. Lubiana was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
164.	Lynn, Stacey D. aka Lynn-Cravotta, Stacey	Ms. Lynn does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
165.	MacAlpine, Sharon A.	Ms. MacAlpine was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
166.	Madison, Kathryn	Ms. Madison does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Thomas Detelich, to whom Ms. Madison reported.
167.	Makowski, Paul A.	

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
168.	Malchev, Hristo T.	Mr. Malchev does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Daniel Pantelis, to whom Mr. Malchev reported.
169.	Malik, Paul	Mr. Malik does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Michael Dougherty, to whom Mr. Malik reported.
170.	<b>Marcus, Michael E.</b>	
171.	<b>Markell, Elaine H.</b>	
172.	Marks, Mike	Mr. Marks does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of George Wilson, to whom Mr. Marks reported.
173.	Markwat, William A.	Mr. Markwat does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
174.	Marsh, David G.	Mr. Marsh does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Curt Cunningham, to whom Mr. Marsh reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
175.	Martinez, Richard J.	Mr. Martinez does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Dennis Morris, to whom Mr. Martinez reported.
176.	Matthews, Michael	Mr. Matthews does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
177.	Mauk, Tom M.	Mr. Mauk does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
178.	McCracken, Robert W.	Mr. McCracken does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
<b>179.</b>	<b>McDonald, Steve L.</b>	
180.	McEvoy, Kent D.	Mr. McEvoy does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Thomas Harmon, to whom Mr. McEvoy reported.
181.	McGinnis, Iris C.	Ms. McGinnis does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.



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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
182.	McKay, Chris J.	Mr. McKay does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
183.	McKinney, Christopher	Mr. McKinney does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
184.	McPhee, Bert	Mr. McPhee was not employed by the Company during the Class Period and thus would not be expected to have any documents relevant to plaintiffs' claims.
185.	<b>Mehta, Bobby N.</b>	
186.	Melcer, David	Mr. Melcer does not appear to have had a significant involvement with the issues presented in this case such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
187.	<b>Menezes, Walter G.</b>	
188.	Mielitz, Doug	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
189.	Miles, Grant F.	Mr. Miles does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Michael Marcus, to whom Mr. Miles reported.
190.	Millick, Lois	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
191.	Minarik, Porsia	Ms. Minarik does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Rich Peters, to whom Ms. Minarik reported.
192.	Mirabella, Timothy R.	Mr. Mirabella does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gregory Gibson, to whom Mr. Mirabella reported.
<b>193.</b>	<b>Mizialko, Cliff S.</b>	
194.	Mocerino, Susan R.	Ms. Mocerino does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Michael Dougherty, to whom Ms. Mocerino reported.
195.	Monaco, Paula E.	Ms. Monaco does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailboxes of Paul Makowski and Daniel Pantelis, to whom Ms. Monaco reported.
196.	Mondoro, John	Mr. Mondoro does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
197.	Moriarty, Anne M.	Ms. Moriarty does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
198.	Morris, Dennis D.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
199.	<b>Morris, Loren J.</b>	
200.	Morrison, Kathleen A.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
201.	Mowry, Scott S.	Mr. Mowry does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Elaine Markell, to whom Mr. Mowry reported.
202.	Myers, Amy	Ms. Myers does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
203.	Naikine, Oleg N.	Mr. Naikine does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
204.	Nardi, Frank L.	Mr. Nardi does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
205.	Nauman, David J.	Mr. Nauman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Thomas Harmon, to whom Mr. Nauman reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
206.	Nelson, Kimberly	Ms. Nelson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
207.	Nicholson, Maria A.	Ms. Nicholson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
208.	Nicola, Jeff	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
209.	Noel, Elizabeth K.	Ms. Noel does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
210.	Noll, Marcus	Mr. Noll does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
211.	Nugent, Janice	Ms. Nugent does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
212.	O'Brien, David M.	Mr. O'Brien does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
213.	O'Brien, John J.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
214.	O'Han, Robert	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
215.	O'Neill, Christopher	Mr. O'Neill does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Uphoff, to whom Mr. O'Neill reported.
216.	Ochoa, Louis	Mr. Ochoa does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
217.	Oguntokun, Femi	Mr. Oguntokun does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
218.	Orbanosky, Brandon	Mr. Orbanosky does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
219.	Orman, Rudy A.	Mr. Orman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Douglas Friedrich, to whom Mr. Orman reported.

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<b>CUSTODIAN</b>	<b>RESPONSE</b>
220. Owens, Merle L.	Ms. Owens does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Chuck Colip, to whom Ms. Owens reported.
221. Panarsese, Joseph (*correct spelling of last name = Panarese)	Mr. Panarese does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
222. Pantelis, Daniel J.	
223. Payne, Lauren	Ms. Payne does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
224. Peart, Steve J.	Mr. Peart does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Michael Skonning, to whom Mr. Peart reported.
225. Pedraja, Gloria V.	Ms. Pedraja does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
226. Pendergast, John C.	Mr. Pendergast does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
227. Peoples, Willie C.	Mr. Peoples does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
228.	Perillo, Tom M.	Mr. Perillo does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Christine Worwa, to whom Mr. Perillo reported.
229.	Pesicka, Robert J.	Mr. Pesicka does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
230.	<b>Peters, Craig S.</b>	
231.	<b>Peters, Rich</b>	
232.	Phan, Cong T.	Mr. Phan does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Per Ekholdt, to whom Mr. Phan reported.
233.	Pickrell, Denis (*Correct spelling of first name = Denise)	Ms. Pickrell does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
234.	Pinto, Mike	Mr. Pinto does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
235.	Pready, Alex	Mr. Pready was an employee of a division of Household with no discernable connection to the issues in dispute in this case.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
236.	Price, Terry	Mr. Price does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
237.	Priester, James	Mr. Priester does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
238.	Qu, Yingbin	Mr. Qu does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Kenneth Gang, to whom Mr. Qu reported.
239.	Quiriconi, Kathy R.	Ms. Quiriconi does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Kauffman, to whom Ms. Quiriconi reported.
240.	Rafferty, Mike M. (correct spelling of last name = Rafferty)	Mr. Rafferty does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Chuck Colip, to whom Mr. Rafferty reported.
241.	Raisbeck, Jean	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
242.	Reault, Eric	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>



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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
243.	Redmon, Gina	Ms. Redmon does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
244.	<b>Reeves, Mike A.</b>	
245.	Reid, Dan	Mr. Reid does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
246.	Requa, Marcus	Mr. Requa does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
247.	Reuter, Rick A.	Mr. Reuter does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Walt Rybak, to whom Mr. Reuter reported.
248.	Rhinehart, Scott K.	Mr. Rhinehart does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Joseph Hoff, to whom Mr. Rhinehart reported.
249.	Rindler, John L.	Mr. Rindler does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
250.	Robarge, Geraldine	Mr. Robarge does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
251.	Robertson, Candis	Ms. Robertson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
252.	Robin, Kenneth H.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
253.	Rockaway, Sean (correct spelling of last name = Rockway)	Mr. Rockway does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Curt Cunningham, to whom Mr. Rockway reported.
254.	Rodgers, Carolyn S.	Ms. Rodgers does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
255.	Rodriguez, Belkys	Mr. Rodriguez does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
256.	Rodriguez, Robert A.	Mr. Rodriguez does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
257.	Rogers, Bill R.	Mr. Rogers does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
258.	Rogers, Conne F. (*correct spelling of first name = Connie)	Ms. Rogers does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gregory Gibson, to whom Ms. Rogers reported.
259.	<b>Rogers, Derek</b>	
260.	Rossi, Michael A.	Mr. Rossi does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
261.	Rossi, Ron	Mr. Rossi does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
262.	Rubino, Paul G.	Mr. Rubino does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
263.	Rugar, Anthony	Mr. Rugar does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
264.	Rutland Drury, Melissa	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
265.	<b>Rybak, Walt</b>	
266.	Salas, Kathy	Ms. Salas does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
267.	Scherbaum, Brian J.	Mr. Scherbaum does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
268.	<b>Schneider, Tom G.</b>	
269.	<b>Schoenholz, David A.</b>	
270.	Schriever, Sharon	Ms. Schriever does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
271.	Schrum, Edward J.	Mr. Schrum does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Connaughton, to whom Mr. Schrum reported.
272.	Seaton, Victor	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
273.	Sekany, Bob	Mr. Sekany does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of D. G. Cliff, to whom Mr. Sekany reported.
274.	<b>Sesterhenn, Pete E.</b>	

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
275.	Shrum, John	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
276.	Siddique, Tariq S.	Mr. Siddique was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
277.	Sizemore, Michael	Mr. Sizemore does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
278.	Skonning, Michael L.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
279.	Smith, Connie A.	Ms. Smith was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
280.	<b>Smith, Steven H.</b>	
281.	Snyder, Chris A.	Mr. Snyder does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Kauffman, to whom Mr. Snyder reported.
282.	<b>Sodeika, Lisa M.</b>	
283.	Soria, Socorrow	Ms. Soria does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
284.	Sproule, Mark	Mr. Sproule does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
285.	<b>Sprude, Margaret A.</b>	
286.	Stanley, Tom	Mr. Stanley does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
287.	Starke, Nancy L.	Ms. Starke does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gregory Gibson, to whom Ms. Starke reported.
288.	Starke, Robert (Bob) E.	Mr. Starke does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
289.	Stender, Thomas	Mr. Stender does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
290.	<b>Sthrome, Russ</b>	
291.	Stockdale, Dave K.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
292.	Streem, Craig A.	The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.
293.	Strybel, Jennifer A.	
294.	Sullivan, Marilou E.	Ms. Sullivan does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Chuck Colip, to whom Ms. Sullivan reported.
295.	Summers, Sarah	Ms. Summers does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
296.	Szpara, Mary	Ms. Szpara does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
297.	Taxer, Devra R.	Ms. Taxer does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
298.	Teng, Tom Q.	Mr. Teng does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Gary Harman, to whom Mr. Teng reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
299.	Thiemann, Daniel E.	Mr. Thiemann does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
300.	Thurman, Shawn	Mr. Thurman does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
301.	Titus, Tim J.	Mr. Titus was an employee in divisions of Household that have no relation to plaintiffs' claims.
302.	Tomasula, Steve	Mr. Tomasula does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Steven McDonald, to whom Mr. Tomasula reported.
303.	Tomlinson, Sasha	The Household Defendants note that Sasha Tomlinson is the same person as Sasha Guglomo. See # 109.
304.	Tsihlis, Sam	Mr. Tsihlis does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
305.	Turner, Steve	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
306.	Tuyorada, Rebecca	Ms. Tuyorada does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.



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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
307.	Tyra, David W.	Mr. Tyra does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
308.	<b>Uphoff, John F.</b>	
309.	Urbance, Dave W.	Mr. Urbance does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
310.	Vail, Matt	Mr. Vail does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
311.	Vertolli, Sero A.	Mr. Vertolli was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
312.	Vires, Michael A.	Mr. Vires does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Connaughton, to whom Mr. Vires reported.
313.	Viswanathan, Mahesh	Mr. Viswanathan does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
314.	<b>Voza, Joe A.</b>	
315.	Waghmare, Tushar M.	Mr. Waghmare does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of James Connaughton, to whom Mr. Waghmare reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
316.	<b>Walloga, Michael L.</b>	
317.	Watson, Gail	Ms. Watson does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
318.	Weaver, Ken	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
319.	Weinstein, Bill	Mr. Weinstein was not employed by the Company.
320.	Wheeler, Michael S.	Mr. Wheeler does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
321.	Wheelock, Jeanette	Ms. Wheelock does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
322.	<b>Wilson, Bernie</b>	
323.	Wilson, George O.	<b>The Household Defendants are willing to compromise with respect to this custodian in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other custodians to which the Household Defendants object.</b>
324.	Wilson, Peter S.	Mr. Wilson does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
325.	Windle, David H.	Mr. Windle does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Walter Menezes, to whom Mr. Windle reported.
326.	Wojcik, Gina M.	Ms. Wojcik does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Derek Rogers, to whom Ms. Wojcik reported.
327.	Worrell, Victoria	Ms. Worrell does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Christine Worwa, to whom Ms. Worrell reported.
328.	<b>Worwa, Christine K.</b>	
329.	Wright, Douglas N.	Mr. Wright does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of John Davis, to whom Mr. Wright reported.
330.	Wright, Jennifer I.	Ms. Wright does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Elaine Markell, to whom Ms. Wright reported.

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	<b>CUSTODIAN</b>	<b>RESPONSE</b>
331.	Ye, Lynn L.	Ms. Ye does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Dave Stockdale, to whom Ms. Ye reported.
332.	Young, Bill	Mr. Young does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives.
333.	Young, Stephen J.	Mr. Young was an employee of a division of Household with no discernable connection to the issues in dispute in this case.
334.	Youngberg, Lisa A.	Ms. Youngberg does not appear to have had a sufficiently high-level position at the Company such that she might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants have already agreed to search the mailbox of Pete Sesterhenn, to whom Ms. Youngberg reported.
335.	Zugehar, Alan M.	Mr. Zugehar does not appear to have had a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims relating to an alleged fraud by Household's top executives. In any event, the Household Defendants are willing to compromise and offer to search the mailbox of Thomas Harmon, to whom Mr. Zugehar reported.

# **TAB 18**



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WASHINGTON, DC • HOUSTON  
PHILADELPHIA • SEATTLE

Monique C. Winkler  
MoniqueW@lerachlaw.com

July 5, 2005

VIA FACSIMILE

Landis Best, Esq.  
David R. Owen, Esq.  
CAHILL GORDON & REINDEL LLP  
Eighty Pine Street  
New York, NY 10005-1702

Re: *Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
Case No. 02-CIV-5893 (N.D. Ill)

Dear Landis and David:

I write in response to David Owen's June 30, 2005 letter regarding the search term and custodian lists.

With respect to the search term list, first, it is plaintiffs' understanding that defendants agree to all terms on the list attached to Sylvia Sum's March 24, 2005 letter except those included on the list of "Search Terms Currently in Dispute" (hereinafter "Disputed Terms") provided by defendants. Please advise immediately if plaintiffs' understanding is incorrect.

Plaintiffs appreciate defendants' willingness to compromise on certain of the Disputed Terms "in exchange for a corresponding demonstration of good faith by plaintiffs in eliminating other terms to which the Household Defendants object." Plaintiffs have thoroughly reviewed defendants' positions with respect to the Disputed Terms. Plaintiffs disagree with defendants' statements that certain terms "bear[] no discernable connection to [this] dispute." Also, the fact that a term would capture references that are not connected to this litigation alone is not sufficient basis to eliminate the term. Nonetheless, based upon a careful review of defendants' positions on the Disputed Terms, plaintiffs are willing to eliminate certain terms and narrow others in such an exchange.

Plaintiffs are willing to eliminate the following terms:

9/11  
acceleration (and all other iterate forms of this term)  
Bernstein

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From-

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Landis Best, Esq.  
David R. Owen, Esq.  
July 5, 2005  
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comply (and all other iterate forms of this term)  
Connaughton  
Cunningham  
Detelich  
Erisa lawsuit  
fascon  
financial statement  
flush  
Friedrich  
Goldman  
Hicks  
Hoff  
injunction (and all other iterate forms of this term)  
integrity  
Kwidzinski  
lawsuit  
litigation  
Littler  
Makowski  
McDonald  
Mehta  
Merrill  
Mizialko  
Monique  
natural disaster (and all other iterate forms of this term)  
nomura (and all other iterate forms of this term)  
Pantelis  
PriceWaterhouse Coopers (and all other iterate forms of this term)  
PWC  
quarterly reports  
revision  
Rybak  
Sarbanes Oxley (and all other iterate forms of this term)  
settlement  
Shrum  
simple interest  
Sodeika  
Sprude  
Uphoff  
Worwa  
wtc



Landis Best, Esq.  
David R. Owen, Esq.  
July 5, 2005  
Page 3

Zaljco

Plaintiffs are willing to compromise on the following terms by narrowing the terms as provided:

amortization (and all other iterate forms of this term) - limit to "negative amortization"

flag - limit to "red flag"

As to defendants' positions on the custodians, the information provided by the defendants is, for the most part, insufficient. The fact that an individual did not have what defendants' deem "a sufficiently high-level position at the Company such that he might be reasonably expected to have any documents relevant to plaintiffs' claims" without more is unpersuasive, particularly in light of the fact that plaintiffs have already advised defendants that the custodian list derived from documents already produced. Likewise, the statement that an individual "was an employee of a division of Household with no discernable connection to the issues in dispute in this case," without even identifying the division, is unconvincing. This lack of information is compounded by defendants' continuing failure to produce complete organization charts. Moreover, the fact that defendants are willing to produce the mailbox of an individual to whom another reported does not provide sufficient basis for not producing the mailbox of the subordinate. The mailboxes would certainly include mutually exclusive relevant documents.

In the spirit of compromise, however, plaintiffs are willing to eliminate the following custodians in response to defendants' offer of exchange:

Paul Andreuzzi  
Michelle Armstrong  
Arif Aziz  
Megan Bobola  
Janine Bosson  
Sandra Brashier  
Renee Cartier  
Mike Cleland  
Ramon Cofield  
Rick Contino  
David Corriher  
Jeff Cruse  
Carol Czerw  
Jonas Eklund





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David R. Owen, Esq.  
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Marianna Folla  
Shawn Ford  
Jacob Frantz  
Bernard Fullen  
Jorge Garcia  
Davin Gardner  
Scott Garland  
Lucille Genco  
Gerard Gordon  
Michelle Guy  
Darryl Hawkins  
Ewa Helm  
Matt Herman  
Thomas Hinson  
Rick Inman  
Terrell Jones  
Madline Joseph  
Ark Khan  
Gary Kjoller  
Kenneth Klein  
Jim Lawrence  
Mark Leyba  
William Markwat  
Michael Matthews  
Christopher McKinney  
Susan Mocerino  
John Mondoro  
Anne Moriarty  
Amy Myers  
Frank Nardi  
Kimberly Nelson  
Marcus Noll  
Janice Nugent  
Femi Oguntokun  
Brandon Orbansky  
Joseph Panarese  
Gloria V. Pedraja  
Willie C. Peoples  
Denise Pickrell  
Alex Pready  
James Priestler

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From-

To-03 Cahill Gordon & R Page 005



Landis Best, Esq.  
David R. Owen, Esq.  
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Gina Redmon  
Dan Reid  
Marcus Requa  
John L. Rindler  
Geraldine Robarge  
Candis Robertson  
Belkys Rodriguez  
Robert A. Rodriguez  
Michael A. Rossi  
Anthony Rugar  
Kathy Salas  
Michael Sizemore  
Socorrow Soria  
Mark Sproule  
Tom Stanley  
Thomas Stender  
Sarah Summers  
Mary Szpara  
Devra Taxer  
Shawn Thurman  
Sam Tsihlis  
Rebecca Tuyorada  
Matt Vail  
Jeanette Wheelock  
Bill Young

Plaintiffs reserve their right to request that defendants search the mailboxes of any of these individuals at a later date in the event further discovery demonstrates that any of them would possess responsive documents.



Landis Best, Esq.  
David R. Owen, Esq.  
July 5, 2005  
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Finally, regarding custodian John Shrum, plaintiffs note that documents reflect his first name is also spelled "Jon" and request that defendants search accordingly.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Monique C. Winkler".

Monique C. Winkler

MCW:mm

cc: Marvin Miller, Esq.  
Adam Deutsch, Esq.  
Y:\Cases\SP\Household Int\Corres\Best\_Owen\_070505.doc

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From-

To-03 Cahill Gordon & R Page 007

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<b>Case Code:</b>	020377-00001		
<b>Subject:</b>	Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. Ill.)		

<b>cc:</b>	Adam B. Deusch, Esq. Eimer Stahl Kievern & Solberg LLP	312-692-1718	312-660-7600
	Marvin A. Miller, Esq. Miller Faucher And Cattery LLP	312-782-4485	312-782-4880

<b>To:</b>	Landis Best, Esq. David Owen, Esq. Cahill Gordon & Reindel LLP	212/269-5420	212/701-3000
	<b>Fax No.</b>		<b>Telephone No.</b>

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