UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| LAWRENCE E. JAFFE PENSION PLAN, Or | , |
|---|---------------------------------|
| Behalf of Itself and All Others Similarly |) (Consolidated) |
| Situated, |) |
| D1 1 4.00 |) <u>CLASS ACTION</u> |
| Plaintiff, |) Judge Ronald A. Guzman |
| VS. |) Magistrate Judge Nan R. Nolan |
| HOUSEHOLD INTERNATIONAL, INC., et al., |) |
| Defendants. |) |
| • |) |

DECLARATION OF SYLVIA SUM IN SUPPORT OF LEAD PLAINTIFFS' REPLY IN SUPPORT OF MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO PRODUCE ELECTRONIC EVIDENCE IN NATIVE ELECTRONIC FORMAT

REDACTED VERSION

I, SYLVIA SUM, declare as follows:

I am an attorney duly licensed to practice before all of the courts of the State of California and the United States District Court, Northern District of Illinois. I am associated with the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, one of the counsel of record for plaintiff in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

1. Volume 1 of 2 contains true and correct copies of the following exhibits:

Exhibit 1:

HHS 00638713-14;

Exhibit 2:

In re Household International, Inc., SEC Administrative Proceeding File No. 3-11072, Order Instituting Cease-and-Desist Proceedings, Making Findings, and Imposing Ceaseand-Desist Order Pursuant to Section 21C of the Securities and Exchange Act of 1934 (Mar. 18, 2003);

Exhibit 3:

HHS 07987558;

Exhibit 4:

HHS 02142888;

Exhibit 5:

HHS 00003668-74;

Exhibit 6:

HHS 01241356-57;

Exhibit 7:

HHS 00030212-13;

Exhibit 8:

HHS 00236470;

Exhibit 9:

HHS 01270054-55;

Exhibit 10:

HHS 01818778;

Exhibit 11:

HHS 00408384-85;

Exhibit 12:

HHS 00149879-81;

Exhibit 13:

HHS 00030201-202;

Exhibit 14:

HHS 00209483;

Exhibit 15:

HHS 00108700;

Exhibit 16:

HHS 00412852;

Exhibit 17:

HHS 01233122;

Exhibit 18:

HHS 01590011-16;

Exhibit 19:

HHS 00644324;

Exhibit 20:

HHS 00721392;

| Exhibit 21: | HHS 01559680; |
|-------------|----------------------------|
| Exhibit 22: | HHS 00426689-90; |
| Exhibit 23: | HHS 00200576; |
| Exhibit 24: | HHS 00200851-54; |
| Exhibit 25: | HHS 00014762-63; |
| Exhibit 26: | HHS 00001391-97; |
| Exhibit 27: | HHS 00033638; |
| Exhibit 28: | HHS 01234515-16; |
| Exhibit 29: | HHS 00645437-38; |
| Exhibit 30: | HHS 00093304; |
| Exhibit 31: | HHS 01776505; |
| Exhibit 32: | HHS 00638859; |
| Exhibit 33: | HHS 02870134; |
| Exhibit 34: | HHS 01634493-95; |
| Exhibit 35: | HHS 02156250; |
| Exhibit 36: | HHS 01835802; |
| Exhibit 37: | HHS 01718207-09; |
| Exhibit 38: | HHS 00110740; |
| Exhibit 39: | HHS 01800564-65; |
| Exhibit 40: | HHS 00032773-787 at 82-83; |
| Exhibit 41: | HHS 00028720; |
| Exhibit 42: | HHS 00685379; |
| Exhibit 43: | HHS 02249927; |
| Exhibit 44: | HHS 00150100; |
| Exhibit 45: | HHS 00305357; |
| Exhibit 46: | HHS 00080628; |
| Exhibit 47: | HHS 00082349; |
| Exhibit 48: | HHS 00112318-19; |
| Exhibit 49: | HHS 00640095-97; |
| Exhibit 50: | HHS 00425493-94; |
| Exhibit 51: | HHS 01292895; |
| Exhibit 52: | HHS 00685391; |
| Exhibit 53: | HHS 00646375-76; |

| Exhibit 54: | HHS 02386236; |
|-------------|------------------|
| Exhibit 55: | HHS 00408473; |
| Exhibit 56: | HHS 00010794-95; |
| Exhibit 57: | HHS 00003631-32; |
| Exhibit 58: | HHS 00685392-93; |
| Exhibit 59: | HHS 01244341; |
| Exhibit 60: | HHS 00638195-96; |
| Exhibit 61: | HHS 02354017; |
| Exhibit 62: | HHS 00285922-25; |
| Exhibit 63: | HHS 00250168-69; |
| Exhibit 64: | HHS 00244841-44; |
| Exhibit 65: | HHS 00033540-42; |
| Exhibit 66: | HHS 01241209-10; |
| Exhibit 67: | HHS 01813171; |
| Exhibit 68: | HHS 01234005-08; |
| Exhibit 69: | HHS 01803327; |
| Exhibit 70: | HHS 01804863-65; |
| Exhibit 71: | HHS 01717178; |
| Exhibit 72: | HHS 00088092; |
| Exhibit 73: | HHS 00060498-99; |
| Exhibit 74: | HHS 00083729; |
| Exhibit 75: | HHS 00030800-02; |
| Exhibit 76: | HHS 01232997; |
| Exhibit 77: | HHS 01233166; |
| Exhibit 78: | HHS 00016336; |
| Exhibit 79: | HHS 01808321-23; |
| Exhibit 80: | HHS 00729064-72; |
| Exhibit 81: | HHS 00721304; |
| Exhibit 82: | HHS 01990012-16; |
| Exhibit 83: | HHS 02821218; |
| Exhibit 84: | HHS 00647830-44; |
| Exhibit 85: | HHS 00468743-45; |
| Exhibit 86: | HHS 01999986; |

| Exhibit 87: | HHS 00645404; |
|--------------|-------------------|
| Exhibit 88: | HHS 00097129-30; |
| Exhibit 89: | HHS 00035216; |
| Exhibit 90: | HHS 00032072; |
| Exhibit 91: | HHS 00678176; |
| Exhibit 92: | HHS 00271606; |
| Exhibit 93: | HHS 00647262-66; |
| Exhibit 94: | HHS 01270093; |
| Exhibit 95: | HHS 00271507; |
| Exhibit 96: | HHS 01778864; |
| Exhibit 97: | HHS 01780166-67; |
| Exhibit 98: | HHS 01781009; |
| Exhibit 99: | HHS 00076952; |
| Exhibit 100: | HHS 01666935; |
| Exhibit 101: | HHS 01709365; |
| Exhibit 102: | HHS 01280278; |
| Exhibit 103: | HHS 00638199-200; |
| Exhibit 104: | HHS 01278867-69; |
| Exhibit 105: | HHS 01231628; |
| Exhibit 106: | HHS 00698235-38; |
| Exhibit 107: | HHS 01267520-25; |
| Exhibit 108: | HHS 01244318; |
| Exhibit 109: | HHS 01527809; |
| Exhibit 110: | HHS 01515177; |
| Exhibit 111: | HHS 00432202-06; |
| Exhibit 112: | HHS 02732289-93; |
| Exhibit 113: | HHS 01258185-88; |
| Exhibit 114: | HHS 01319451-52; |
| Exhibit 115: | HHS 00639612-14; |
| Exhibit 116: | HHS 00637622; |
| Exhibit 117: | HHS 00959225-27; |
| Exhibit 118: | HHS 00422315-16; |
| Exhibit 119: | HHS 00138946; |

HHS 00085486; Exhibit 120: Exhibit 121: HHS 01587482-84; Exhibit 122: HHS 00037493-94; Exhibit 123: HHS 01263608; Exhibit 124: HHS 00079863-65; Exhibit 125: HHS 00220803-08; Exhibit 126: HHS 00120493-500; Exhibit 127: HHS 00001798-800; Exhibit 128: HHS 00000124-25;

2. Volume 2 of 2 contains true and correct copies of the following exhibits:

Exhibit 129: HHS 00432259; Exhibit 130: HHS 00680534-35; Exhibit 131: HHS 00137963; Exhibit 132: HHS 00096697; Exhibit 133: HHS 00209008-09; Exhibit 134: HHS 00041065; Exhibit 135: HHS 00088462-63; Exhibit 136: HHS 01582712; Exhibit 137: HHS 00200953-55; Exhibit 138: HHS 01512238-55; HHS 00679427-31; Exhibit 139: Exhibit 140: HHS 00059635; Exhibit 141: HHS 00284961-62; Exhibit 142: HHS 00213205-08; Exhibit 143: HHS 01534167; HHS 00724593-94; Exhibit 144: HHS 01776495; Exhibit 145: Exhibit 146: HHS 01776982-85; Exhibit 147: HHS 00662821; Exhibit 148: HHS 01581360; Exhibit 149: HHS 01776477; Exhibit 150: HHS 01233498-500;

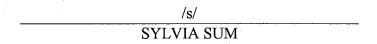
| Exhibit 151: | HHS 01782481-84; |
|--------------|------------------------|
| Exhibit 152: | HHS 00647352-55; |
| Exhibit 153: | HHS 02308188-90; |
| Exhibit 154: | HHS 02302670-71; |
| Exhibit 155: | HHS 00236725-26; |
| Exhibit 156: | HHS 00287300-02; |
| Exhibit 157: | HHS 00287729; |
| Exhibit 158: | HHS 01556079-81; |
| Exhibit 159: | HHS 00085485; |
| Exhibit 160: | HHS 01832259-60; |
| Exhibit 161: | HHS 01583542-47; |
| Exhibit 162: | HHS 00284750-52; |
| Exhibit 163: | HHS 00030554; |
| Exhibit 164: | HHS 00060520-21; |
| Exhibit 165: | HHS 00638503-04; |
| Exhibit 166: | HHS 01333550; |
| Exhibit 167: | HHS 01277156-59; |
| Exhibit 168: | HHS 01634937-40; |
| Exhibit 169: | HHS 01717534-38; |
| Exhibit 170: | HHS 01331205-10 at 08; |
| Exhibit 171: | HHS 00642272-75; |
| Exhibit 172: | HHS 01512200-02; |
| Exhibit 173: | HHS 00196418; |
| Exhibit 174: | HHS 01780880; |
| Exhibit 175: | HHS 00410531; |
| Exhibit 176: | HHS 01865793; |
| Exhibit 177: | HHS 00040451-54; |
| Exhibit 178: | HHS 01804384; |
| Exhibit 179: | HHS 00033677-78; |
| Exhibit 180: | HHS 00235753-55; |
| Exhibit 181: | HHS 00410065; |
| Exhibit 182: | HHS 00640028-31; |
| Exhibit 183: | HHS 00639757-60; |

| Exhibit 184: | HHS 00638201-02; |
|--------------|-------------------|
| Exhibit 185: | HHS 00010799-801; |
| Exhibit 186: | HHS 00001760-61; |
| Exhibit 187: | HHS 00078996-9021 |
| Exhibit 188: | HHS 01232440-47; |
| Exhibit 189: | HHS 00116809-10; |
| Exhibit 190: | HHS 00120073-74; |
| Exhibit 191: | HHS 00030292; |
| Exhibit 192: | HHS 00044504-06; |
| Exhibit 193: | HHS 00787591; |
| Exhibit 194: | HHS 01781645; |
| Exhibit 195: | HHS 00646648-58; |
| Exhibit 196: | HHS 01998094-101; |
| Exhibit 197: | HHS 01640276; |
| Exhibit 198: | HHS 00639859-60; |
| Exhibit 199: | HHS 01276635; |
| Exhibit 200: | HHS 00240055-57; |
| Exhibit 201: | HHS 01232647-50; |
| Exhibit 202: | HHS 00030710-11; |
| Exhibit 203: | HHS 00200618-19; |
| Exhibit 204: | HHS 00200938-39; |
| Exhibit 205: | HHS 00044499; |
| Exhibit 206: | HHS 00235922; |
| Exhibit 207: | HHS 01805291; |
| Exhibit 208: | HHS 01243195; |
| Exhibit 209: | HHS 01244569-71; |
| Exhibit 210: | HHS 02017765-66; |
| Exhibit 211: | HHS 01843199-200; |
| Exhibit 212: | HHS 00062745-47; |
| Exhibit 213: | HHS 02042080; |
| Exhibit 214: | HHS 00658403; |
| Exhibit 215: | HHS 00413213; |
| Exhibit 216: | HHS 00220713-15; |

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| Exhibit 217: | HHS 01527523-26; |
|--------------|----------------------|
| Exhibit 218: | HHS 00083009; |
| Exhibit 219: | HHS 00787591; |
| Exhibit 220: | HHS 01800114; |
| Exhibit 221: | HHS 01804712-13; |
| Exhibit 222: | HHS 01780628-31; |
| Exhibit 223: | HHS 01784029; |
| Exhibit 224: | HHS 00030404-05; |
| Exhibit 225: | HHS 00030699; |
| Exhibit 226: | HHS 00029779-86; |
| Exhibit 227: | HHS 00037506-08; |
| Exhibit 228: | HHS 00678714-15; and |
| Exhibit 229: | HHS 01987558. |
| | |

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 20th day of July, 2005, at San Francisco, California.



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Exhibit 1 Filed Under Seal

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Exhibit 2



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U.S. Securities and Exchange Commission

UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

SECURITIES EXCHANGE ACT OF 1934 Release No. 47528 / March 18, 2003

ADMINISTRATIVE PROCEEDING File No. 3-11072

In the Matter of

Household International, Inc.,

Respondent.

ORDER INSTITUTING CEASE-AND-DESIST PROCEEDINGS, MAKING FINDINGS, AND IMPOSING CEASE-AND-DESIST ORDER PURSUANT TO SECTION 21C OF THE SECURITIES EXCHANGE ACT OF 1934

I.

The Securities and Exchange Commission ("Commission") deems it appropriate that public cease-and-desist proceedings be, and hereby are, instituted pursuant to Section 21C of the Securities Exchange Act of 1934 ("Exchange Act") against Household International, Inc. ("Household" or "Respondent").

II.

In anticipation of the institution of these proceedings, Respondent has submitted an Offer of Settlement (the "Offer") which the Commission has determined to accept. Solely for the purpose of these proceedings and any other proceedings brought by or on behalf of the Commission, or to which the Commission is a party, and without admitting or denying the findings herein, except as to the Commission's jurisdiction over it and the subject matter of these proceedings, which are admitted, Respondent consents to the entry of this Order Instituting Cease-and-Desist Proceedings, Making Findings, and Imposing Cease-and-Desist Order Pursuant to Section 21C of the Securities Exchange Act of 1934, as set forth below.

III.

On the basis of this Order and Respondent's Offer, the Commission finds¹ that:

Respondent

1. Household is a Delaware corporation headquartered in Prospect Heights, Illinois. Household's securities are registered with the Commission pursuant to Section 12(b) of the Exchange Act. Household's stock is listed on the New York Stock Exchange under the symbol HI. During the relevant time period, Household filed periodic and other informational reports with the Commission pursuant to Section 13(a) of the Exchange Act. Household was created as a holding company in 1981 as a result of a shareholder approved restructuring of Household Finance Corporation.

Background

- 2. Household is a financial institution that, through its subsidiaries, provides a variety of loan products to consumers in the United States, the United Kingdom and Canada. Household is a Fortune 500 company with more than \$97.9 billion in owned assets and with reported net revenues for 2002 of approximately \$11.2 billion. Household sells its loan products primarily to sub-prime borrowers. Sub-prime borrowers are those who exhibit characteristics indicating a significantly higher risk of default than traditional bank lending customers. Household's loan products include real estate secured loans, auto finance loans, credit cards, tax refund anticipation loans, retail installment loans and other unsecured loans. As of December 31, 2002, Household had approximately 31,000 employees and over 50 million active customer accounts. Household's primary business units are Consumer Lending, Mortgage Services, Retail Services, Credit Card Services and Auto Finance.
- 3. Household's Consumer Lending business unit extends both secured and unsecured loans to consumers through a network of over 1,300 branch offices located throughout the United States. Consumer Lending has approximately \$43.4 billion in managed receivables. Managed receivables include the sum of Household's owned receivables and those that it services for investors as part of its asset securitization program. The Mortgage Services business unit is involved primarily in the purchase in the secondary market of mortgage loans that are originated by other lenders, as well as the servicing of these loans after they are purchased. Mortgage Services has approximately \$17 billion in managed receivables. The Retail Services business unit is one of the largest providers of third-party private label credit cards in the United States, with approximately \$12.6 billion in managed receivables. The Credit Card Services business unit includes both the direct issuance by Household of credit cards to consumers and Household's purchase and servicing of credit card accounts originated by third parties. The Credit Card Services business unit has approximately \$18.1 billion in managed receivables. The Auto Finance business unit extends secured loans to consumers and purchases installment contracts from auto dealers and has approximately \$7.4 billion in managed receivables.
- 4. One of the critical measures of Household's financial performance is the delinquency rate for its loan portfolio and related disclosures and statistics concerning the restructuring (or so-called re-aging) of delinquent accounts. Household, like its peer lending institutions, reports to the investing public its "2+ delinquency" rate. The 2+ delinquency rate refers to the percentage of loans in Household's total loan portfolio that are at least sixty days past due. The 2+ delinquency rate and restructuring statistics are key measures of Household's financial performance because they positively correlate to charge-off rates and loan loss reserves. Investors and analysts use

Household's 2+ delinquency rate and restructuring statistics to evaluate the relative credit quality of Household's consumer finance receivables. The 2+ delinquency rate and restructuring statistics are especially important for sub-prime lenders like Household because of the increased likelihood of credit quality problems in sub-prime loan portfolios.

Household's False and Misleading Statements Concerning Its Delinquent Loan Restructure and Forbearance Policies

- 5. In late 2001, in response to questions raised by the media and analysts, Household initiated a number of actions designed to obtain more information about its practice of restructuring delinquent loans. Household requested an outside consultant to prepare a report that, among other things, benchmarked Household's restructure policies and volume to its peer group of financial institutions. Household also conducted an internal study to determine the number of loans in its portfolio that had ever been restructured.
- 6. The consultant delivered its report to Household on or about March 12, 2002. The report disclosed, among other things, that Household had a higher volume of delinquent loan restructures and was outside of the range of its peer group's practices with respect to its practice of automatically restructuring delinquent accounts without requiring contact with delinquent customers.
- 7. On March 13, 2002, Household filed a Form 10-K that disclosed Household's restructuring policies. Specifically, the Management's Discussion and Analysis of Financial Condition and Results of Operations portion of Household's Form 10-K included the statement that "[o]ur policies for consumer receivables permit reset of the contractual delinquency status of an account to current, subject to certain limits, if a predetermined number of consecutive payments has been received and there is evidence that the reason for the delinquency has been cured." Household reiterated this disclosure in its Form 10-Q for second quarter 2002, filed on August 14, 2002, its Form 10-K/A for fiscal year 2001, filed August 27, 2002, and its Form 10-Q for third quarter 2002, filed October 24, 2002. Beginning in April 2002, Household also disclosed the percentage of loans in its domestic portfolio that had ever been restructured. In various Commission filings since April 2002, Household has reported that the percentage of loans in its domestic portfolio that had ever been restructured ranged from 16.9% as of December 31, 2001, to 15.6% as of December 31, 2002.
- 8. Household's disclosures regarding its restructure policies fail to present an accurate description of the minimum payment requirements applicable under the various policies and are therefore false and misleading. In numerous instances Household will accept one or zero payments prior to restructure. The Auto Finance and Retail Services businesses, for example, generally allow the restructuring of delinquent accounts if one payment is made within the last sixty days. There are also instances where Household will restructure a delinquent loan without receiving any payments, such as loans where the borrower has filed for Chapter 7 bankruptcy protection and has reaffirmed Household's debt.
- 9. Household's restructure policy disclosures are also false and misleading since they fail to disclose Household's policy of automatically restructuring numerous loans. With automatic restructures, no communication with the customer is required to determine whether the cause of delinquency is

cured. In Consumer Lending, for example, the majority of the more than \$1 billion of restructures per month are performed automatically, without any requirement that Household employees first contact the customer to determine whether the reason for delinquency has been cured. Instead of obtaining information from the customer that the cause of the delinquency has been cured, Consumer Lending sends a computer-generated notice to customers stating that the account has been restructured to current status.

- 10. Household's false and misleading disclosures are material in light of the significant volume of Household's loan restructures and the nature of Household's lending businesses. During the time period covered by Household's disclosure of its restructuring policies, between 15.6% and 16,9% of Household's domestic loans had been restructured at least once and many of those restructures were done automatically. Further, the consultant's study of Household's restructuring policies showed that Household restructures significantly more loans than its peer financial institutions and that, unlike its peers, Household automatically restructures delinquent loans without requiring communications with the borrower prior to the restructure. Moreover, Household's restructured loans are likely to be restructured again, 2+ delinquent or charged-off at 12 months after the initial restructure. For example, as of December 31, 2001, 53.9% of the real estate secured loans restructured by Household in the previous 12 months were restructured again, were 2+ delinquent, or had been chargedoff. In addition, as of December 31, 2001, 75.2% of the personal homeowner loans Household had restructured in the previous 12 months were restructured again, were 2+ delinquent, or had been charged-off. Further, loans automatically restructured by Household's Auto Finance business unit have a significantly higher charge-off rate than those restructured manually by Household's employees after contact with the delinguent customer.
- 11. Household knew or was reckless in not knowing that its disclosures regarding restructuring policies were false and misleading. Before disclosure, Household did an internal study to determine the volume of loans in its portfolio that it had ever restructured and had an outside consultant benchmark Household's restructure volume and policies to its peer financial institutions. Prior to Household's March 13, 2002 Form 10-K disclosure, Household knew that it was outside its peer group range with respect to the volume of delinquent loans that it restructures and with respect to its practice of automatically restructuring delinquent loans. Nevertheless, Household chose to disclose its restructure policies in a way that connoted strict controls, rather than in a way that accurately described the policies.
- 12. Household's disclosures relating to its restructuring and account management policies are also misleading because Household omits to disclose its policy of excluding forbearances from 2+ delinquency in certain of its businesses. In substance, forbearance occurs when Household acts on a delinquent account by entering into an arrangement with a customer to forbear on collection actions in exchange for temporarily increased payments or, in the case of certain forbearances, or re-writes, reduced payments. Household's Mortgage Services business unit enters into forbearance arrangements and then automatically excludes those forbearances from its 2+ delinquency statistics. Household also has approximately \$900 million of loans in some form of forbearance, or approximately 1% of Household's total assets.
- 13. Household knowingly or recklessly omitted to disclose that loans in forbearance are excluded from its 2+ delinquency rates. The failure to

disclose this fact when making specific disclosures about restructuring practices and delinquent accounts made the disclosures false and misleading.

Violations of the Exchange Act

- 14. As a result of the conduct described above, Household violated Section 10(b) of the Exchange Act and Rule 10b-5 thereunder. Section 10(b) of the Exchange Act and Rule 10b-5 thereunder prohibit a person, in connection with the purchase or sale of a security, from making an untrue statement of a material fact or from omitting to state a material fact necessary to make statements made, in light of the circumstances under which they were made, not misleading.
- 15. In addition, Household violated Section 13(a) of the Exchange Act and Rules 12b-20, 13a-1, and 13a-13 thereunder. Section 13(a) of the Exchange Act and Rules 13a-1 and 13a-13 thereunder require issuers with securities registered under Section 12 of the Exchange Act to file quarterly and annual reports with the Commission and to keep this information current. Rule 12b-20 under the Exchange Act requires that such reports contain, in addition to disclosures expressly required by statute and rules, such other information as is necessary to ensure that the statements made in those reports are not, under the circumstances, materially misleading. The obligation to file such reports embodies the requirement that they be true and correct.

Undertaking

 16. Respondent Household undertakes to fully cooperate in the Commission's ongoing investigation in this matter.

Cooperation and Other Acts

17. In determining to accept the Offer, the Commission considered Household's undertaking described in section 16 herein and certain other acts related to Household's cooperation in this investigation.

IV.

In view of the foregoing, the Commission deems it appropriate to impose the sanctions agreed to in Respondent Household's Offer.

ACCORDINGLY, IT IS HEREBY ORDERED:

Pursuant to Section 21C of the Exchange Act, that Respondent Household cease and desist from committing or causing any violations and any future violations of Section 10(b) of the Exchange Act and Rule 10b-5 thereunder, and Section 13(a) and Rules 12b-20, 13a-1, and 13a-13 thereunder.

By the Commission.

Jonathan G. Katz Secretary

Footnote

 $^{f 1}$ The findings herein are made pursuant to Respondent's Offer of

Iouschold International, 1102, A desire Procedule No. 32635286 March 21803093 ge 17 of 21 PageID #:4273 ge 6 of 6

Settlement and are not binding on any other person or entity in this or any other proceeding.

http://www.sec.gov/litigation/admin/34-47528.htm

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Modified: 03/19/2003

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Exhibit 3 through 229 Filed Under Seal

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DECLARATION OF SERVICE BY UPS DELIVERY

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States

and employed in the City and County of San Francisco, over the age of 18 years, and not a party to

or interested party in the within action; that declarant's business address is 100 Pine Street,

Suite 2600, San Francisco, California 94111.

2. That on July 21, 2005, declarant served by UPS, next day delivery, the

DECLARATION OF SYLVIA SUM IN SUPPORT OF LEAD PLAINTIFFS' REPLY IN

SUPPORT OF MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO PRODUCE

ELECTRONIC EVIDENCE IN NATIVE ELECTRONIC FORMAT to the parties listed on the

attached Service List.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st day of July, 2005, at San Francisco, California.

| /s/ | |
|------------------|--|
| MONINA O. GAMBOA | |

HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 7/21/2005 (02-0377) Page 1 of 2

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