

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

LAWRENCE E. JAFFE PENSION PLAN, On )	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly )	(Consolidated)
Situated, )	
Plaintiff, )	<u>CLASS ACTION</u>
vs. )	Judge Ronald A. Guzman
)	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., et )	
al., )	
Defendants. )	
_____ )	

**DECLARATION OF LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS'  
REPLY IN SUPPORT OF MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS  
TO PRODUCE DOCUMENTS IMPROPERLY WITHHELD ON THE BASIS OF  
PRIVILEGE**

**REDACTED VERSION**

I, LUKE O. BROOKS, declare as follows:

1. 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 plaintiffs in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit A: June 16, 2005 letter from Azra Z. Mehdi to Landis C. Best;
- Exhibit B: Third Revised First Privilege Log of the Household Defendants, dated June 23, 2005 ("Log IV");
- Exhibit C: Redlined version of Log IV reflecting changes to Second Revised Privilege Log of the Household Defendants, dated May 18, 2005 ("Log III");
- Exhibit D: Document No. 40 (HHS 02303490-92);
- Exhibit E: Document No. 41 (HHS 02303494-514);
- Exhibit F: Document No. 4 (HHS 02201556);
- Exhibit G: Document No. 6 (HHS 02217827-28);
- Exhibit H: Document No. 10 (HHS 02232571-72);
- Exhibit I: Document No. 17 (HHS 02294030-35);
- Exhibit J: Document No. 18 (HHS 02294279);
- Exhibit K: Document No. 1 (HHS 02201493-94);
- Exhibit L: Document No. 21 (HHS 02299144-45);
- Exhibit M: Document No. 29 (HHS 02301983-90);
- Exhibit N: Document No. 100 (HHS 02408836); and
- Exhibit O: Document No. 101 (HHS 02408837).

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.

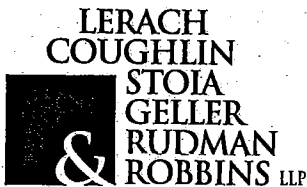
/s/

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LUKE O. BROOKS

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# Exhibit A



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

Azra Z. Mehdi  
[azram@lerachlaw.com](mailto:azram@lerachlaw.com)

June 16, 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:

This letter memorializes plaintiffs' understanding of the June 14, 2005 meet and confer regarding the source log and privilege log motions to compel filed by plaintiffs on June 3, 2005. It also includes plaintiffs' responses to certain questions raised during the session.

**1. Motion to Compel Source Logs and Verification That Document Production Complete:**

The Household Defendants agreed to provide plaintiffs by June 17, 2005 a source log for the production to date in the form of a chart identifying by Bates number the person whose file the documents came from or department where the document was located. Plaintiffs will inform the Household Defendants by June 22, 2005, if the source log is satisfactory. The Household Defendants will inform plaintiffs of any objections they may have to the production of source logs for the document production going forward.

The Household Defendants deferred discussion of the issue of verification that production was complete pursuant to each document request until the conclusion of their internal discussions.

**2. Motion to Compel Production of Certain Documents Withheld in Privilege Log III:**

The Household Defendants disagree that any of the documents challenged by plaintiffs should be produced. You proposed that Household Defendants would select a representative sample of the documents being challenged under each category for Magistrate Judge Nolan's review. You also proposed that plaintiffs could add a few additional documents to this sample list.



Landis Best, Esq.

June 16, 2005

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Plaintiffs believe that this approach is not reasonable given that each deficient category includes many different types of documents, such as training materials, HUD materials, complaints, AG investigations, etc., making it impossible to evaluate the privilege assertion for all documents in the category based upon sample documents. For example, the rationale supporting the claimed privilege for documents regarding AG investigations may not apply to a privilege asserted for documents regarding training materials. Without the advantage that the Household Defendants have of being able to see the documents, plaintiffs are in no better position now than they were on May 18, 2005, when you produced Log III or on June 6, 2005, when plaintiffs filed the motion to compel. Accordingly, plaintiffs would like to know if the Household Defendants are willing to provide more detailed descriptions of the withheld documents to allow plaintiffs to eliminate some of their challenges. For instance, the Household Defendants have refused to identify any of the members of the control group despite the fact that this information may eliminate a number of entries challenged by plaintiffs. We are also willing to meet and confer for a document-by-document discussion, if the Household Defendants are willing to provide more information rather than conclusory statements that the documents reflect a "lawyer's legal analysis." Plaintiffs would like to know the basis for the Household Defendants' determination that education and training documents withheld constitute legal advice, rather than business advice.

Finally, plaintiffs raised the possibility of mediating the case before Magistrate Judge Nolan, as communicated by Judge Nolan's willingness to do so at the June 9, 2005 motion hearing. You informed me that your client is considering it. As I mentioned in the call on Tuesday, plaintiffs are absolutely willing to mediate before Judge Nolan.

Very truly yours,

*Azra Mehdi*  
Azra Z. Mehdi

AZM:mog

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

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# Exhibit B

*Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
 Lead Case No. 02-C5893 (Consolidated)  
 Third REVISED First Privilege Log of the Household Defendants  
 June 23, 2005

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
1								Document Has Been Produced.
2	HHS 02201551	N/A	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)  Jean S. Raisbeck (Policy and Compliance)	N/A	Price Operations	Communicate to recipients legal review and questions regarding content of work-sheets used for training of employees regarding Price Operations, as per request of clients.	Attorney-Client privilege: Redacted material contains handwritten notes communicated to recipient from attorney reflecting legal review of training work-sheets and suggesting changes thereto, including references to legal requirements of Washington and New York.
3	HHS 02201555							Document Has Been Produced.
4	HHS 02201556							Document Has Been Produced.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
5	HHS 02201653	04/11/2002	Jean S. Raisbeck (Policy and Compliance)	Andrew M. Budish, Esq. (Senior Counsel)  Keith A. Clardy (HFC-Training and Communications)	N/A	Price Op-tions	Communicate to recipients legal advice regarding price options, in-cluding neces-sary require-ments for em-ployees to fol-low when dis-cussing dis-count points, in order to be compliant with the law.	Attorney-Client privilege: Email reflecting legal ad-vice of Andrew M. Bud-ish, Esq., as communicated to clients, regarding neces-sary requirements for em-ployees to follow when discussing discount points, in order to be compliant with the law.
6	HHS 02217827- HHS 02217828							Document Has Been Pro-duced.
7	HHS 02232531- HHS 02232541	03/09/2001	Victor H. Miller, Esq. (Legal De-partment)  Sally Holloway, Esq. (Legal De-partment)	Kathy Ruhaak (Learning and Development Instructional Designer)	N/A	Fair Debt Collection Practices Act (FDCPA)	Communicate to Kathy Ru-haak regarding legal review of a training man-ual in order to insure compli-ance with the FDCPA.	Attorney-Client privilege; Redacted material contains a handwritten memo from Victor H. Miller, Esq. and handwritten notes and comments of Sally A. Hol-loway, Esq., communi-cated to client, and written to ensure compliance with federal law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
8	HHS 02232542- HHS 02232559	N/A	Sally Holloway, Esq. (Legal Department)	Policy and Compliance Department	N/A	Fair Debt Collection Practices Act (FDCPA)	Communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; Redacted material contains handwritten notes and comments of Sally A. Holloway, Esq., which were communicated to the client, and written to insure compliance with federal law.
9	HHS 02232561- HHS 02232570	N/A	Sally Holloway, Esq. (Legal Department)	Policy and Compliance Department	N/A	Fair Debt Collection Practices Act (FDCPA)	Communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; Redacted material contains handwritten notes and comments of Sally A. Holloway, Esq., which were communicated to the client, and written to insure compliance with federal law.
10	HHS 02232571- HHS 02232572							Document Has Been Produced.
11	HHS 02232842- HHS 02232887	04/21/2000	Victor H. Miller, Esq. (Legal Department)	Kathy Ruhaak (Learning and Development Instructional Designer)	N/A	Fair Debt Collection Practices Act (FDCPA)	Communicate to Kathy Ruhaak regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; Redacted material contains handwritten notes and comments of Victor H. Miller, Esq., which were communicated to the client, and written to insure compliance with federal law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
12	HHS 02232890- HHS 02232938	03/31/2000	Victor H. Miller, Esq. (Legal Department)	Kathy Ruhaak (Learning and Development Instructional Designer)	N/A	Fair Debt Collection Practices Act (FDCPA)	Communicate to Kathy Ruhaak regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; Redacted material contains handwritten notes and comments of Victor H. Miller, Esq., which were communicated to the client, and written to insure compliance with federal law.
13	HHS 02233092- HHS 02233095	02/02/2000	Kathy Ruhaak (Learning and Development Instructional Designer)	Anne Marie Marks (B/U Training & Development Manager)	N/A	Fair Debt Collection Practices Act (FDCPA) Changes and Mini-Miranda Warnings	Communicate to client regarding state law requirements regarding mini-Miranda warnings.	Attorney-Client privilege; Redacted material encompassing memos from Andrew Budish, Esq. to (1) George Wilson and Kathleen Curtin and (2) Bernice D. Wilson (HFC Real Estate Collections), Chris Snyder (Policy and Compliance), Mike Marks (VP - Collections), David Little (MD - Consumer Lending Operations), and Kathy Huston (Unit Manager - Collections) regarding application of state laws re: Mini-Miranda Warnings.
14	HHS 02290819	05/12/1999	Andrew M. Budish, Esq. (Senior Counsel)	Martina Vargas (Policy and Compliance)	N/A	Alabama loan agreements.	Email correspondence requesting and relaying attorney comments to Alabama loan agreements.	Attorney-Client privilege; Email between lawyer and client regarding loan language and application of Alabama law.

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#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
15	HHS 02291392							Document Has Been Produced.
16	HHS 02291884 - HHS 02291898	04/05/2002	Andrew M. Budish, Esq. (Senior Counsel)	EFS (Electronic Forms Systems), Part of Policy and Compliance, headed by Marian Iverson.	N/A	Truth In Lending Disclosures, FMP Pilot Loan Agreement Language Changes, Loan Repayment and Security Agreement.	Communication to client of attorney's edits and comments to draft loan documents, based on legal requirements of state and federal law.	Attorney-Client privilege; Redacted material communicates attorney comments and edits to draft loan language to client, based on legal requirements of state and federal law.
17	HHS 02294030 - HHS 02294031							Document Has Been Produced.
18	HHS 02294279							Document Has Been Produced.
19	HHS 02294333	03/01/1999	Elizabeth De Paula Arias, Esq. (Household Counsel)	Sherry L. Woodson (Policy and Compliance)	William Connolly (Senior Manager - Customer Information Management)	Arizona Consumer Contracts law.	Email correspondence requesting and relaying edits to Arizona loan documents, based on application of Arizona law.	Attorney-Client privilege; Email between lawyer and client regarding Arizona Consumer Contracts and application of Arizona law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
20	HHS 02294873 - HHS 02294874	01/04/2000	Jim D. Pommier (Policy and Compliance)	Elizabeth De Paula Arias, Esq. (Household Counsel)	Robert P. Norwich (Policy and Compliance)	Arizona Personal Home Loans	Email correspondence requesting and providing advice regarding Arizona loans, including application of state and federal law, and including handwritten notes re: same.	Attorney-Client privilege; Email between lawyer and client requesting and providing advice regarding Arizona loan documents, including advice re: application of state and federal law.
21	HHS 02299144 - HHS 02299145							Document Has Been Produced.
22	HHS 02299305 - HHS 02299306	04/11/2002	Katie Moorhead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	N/A	Iowa Loan Repayment Security Agreement	Email correspondence requesting and providing advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.	Attorney-Client privilege; Email correspondence between lawyer and client requesting and providing attorney advice, edits and comments to Iowa loan documents as per legal requirements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
23	HHS 02299315 - HHS 02299318	03/25/2002	Katie Moorhead, Esq. (HFC Law Department)	Adrian L. Bolding (Policy and Compliance Specialist)	Celia Gomez (Consumer Lending)	Iowa Loan Repayment and Security Agreement	Communications requesting and providing attorney advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.	Attorney-Client privilege; Redacted material contains email between lawyer and client requesting and providing legal advice, edits and comments to Iowa loan documents, and includes comments and approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.
24	HHS 02299325 - HHS 02299332	04/01/2002	Katie Moorhead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	N/A	Iowa Loan Repayment and Security Agreement	Communications requesting and providing attorney advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.	Attorney-Client privilege; Redacted material contains email between lawyer and client requesting and providing legal advice, edits and comments to Iowa loan documents, and includes comments and approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
25	HHS 02300741 - HHS 02300742	09/10/2002	Donna L. Radzik, Esq. (Household Counsel)	Lidia Lemus (Policy and Compliance)	N/A	Loan language for Contract Rates.	Email correspondence requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan language, as per legal requirements.	Attorney-Client privilege; Redacted material contains email correspondence requesting and providing attorneys advice regarding draft loan language, as per legal requirements.
26	HHS 02300745- HHS 02300746	09/10/2002	Donna L. Radzik, Esq. (Household Counsel)	Lidia Lemus (Policy and Compliance)	N/A	Loan language for Contract Rates.	Email correspondence requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan language, as per legal requirements.	Attorney-Client privilege; Redacted material contains email correspondence requesting and providing advice of attorneys regarding draft loan language, as per legal requirements.
27	HHS 02300771 - HHS 02300772	08/15/2002	Andrew M. Budish, Esq. (Senior Counsel)	Sean E. Casey (Assistant Manager - Policy & Compliance Support)	N/A	Illinois Revolving Real Estate and PHL Forms	Email correspondence requesting and providing advice of Andrew M. Budish regarding draft loan language, as per legal requirements.	Attorney-Client privilege; Redacted material contains email correspondence requesting and providing advice of attorney regarding draft loan language, as per legal requirements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
28	HHS 02301553 - HHS 02301554	09/05/1997	Jeff Wood, Esq. (Law Department)	Stephen P. Pickett (Southwestern Unit Manager)	Daniel J. Doyle (Policy and Compliance)  Tom G. Schneider (Director, Policy and Compliance Support)  Lee Leggette, Esq. (Household Counsel)  Jo Ann Davis, Esq. (Household Counsel)  Kathleen K. Curtin, Esq. (General Counsel)  Thomas M. Detelich (MD - Consumer Lending)  Dave J. Philipps (Policy and Compliance Support)  John J. Berwanger, Esq. (HFC Law)  Patrick F. Zenzola (Government Relations - California)	Household loan policies for California Commercial Properties.	Email correspondence requesting and relaying attorney advice to client regarding Household loan policies, as per requirements of California law.	Attorney-Client privilege; Redacted material requests and relays advice from attorney to client regarding Household loan policies, as per requirements of California law.
29	HHS 02301983							Document Has Been Produced.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
30	HHS 02302527	11/26/1997	Shehad A. Mohammed (Responsible Lending)	Cindy M. Brown (Household employee)	N/A	California sales forms.	Email chain containing question to John J. Berwanger, Esq. (HFC Law), and attorney answer, regarding use of form under California law.	Attorney-Client privilege; Email between lawyer and client regarding interpretation of California law.
31	HHS 02302532	04/30/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California fair lending law.	Email containing question to attorney, and attorney answer, regarding California fair lending law.	Attorney-Client privilege; Email between lawyer and client regarding application of California Fair Lending law.
32	HHS 02302533	04/17/1998	Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Email containing question to attorney regarding California fair lending law.	Attorney-Client privilege; Email between lawyer and client regarding application of California Fair Lending law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
33	HHS 02302534 - HHS 02302535	02/27/1998	Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Facsimile containing email seeking and providing legal advice from Nancy J. Bromley, Esq., John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) regarding California fair lending law.	Attorney-Client privilege; Communication between lawyers and client regarding interpretation of California law.
34	HHS 02302538 - HHS 02302539	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	Kathleen K. Curtin, Esq. (General Counsel)	California fair lending law.	Email correspondence requesting and providing legal advice from John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) regarding California fair lending law.	Attorney-Client privilege; Redacted material contains email between lawyers and client regarding application of California law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
35	HHS 02302542 - HHS 02302543	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	N/A	California fair lending law.	Facsimile containing email requesting and providing legal advice from John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) on California fair lending law.	Attorney-Client privilege; Redacted material contains a communication between lawyer and client regarding interpretation of California law.
36	HHS 02302595	05/07/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Trustee	Email seeking and providing legal advice from Nancy J. Bromley re: use of trustee on California loans.	Attorney-Client privilege; Redacted material contains a communication between lawyer and client regarding application of California law re: trustees.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
37	HHS 02302672	04/28/1998	Daniel J. Doyle (Policy and Compliance)	Jon R. Shrum (AVP Quality Assurance and Compliance)	Cindy M. Brown (Household employee) Dave J. Philipps (Policy and Compliance Support)	California law re: questions concerning race, in connection with certain loans.	Email correspondence relaying legal advice of Nancy J. Bromley, Esq. (Senior Counsel) and John Berwanger, Esq. (HFC Law), as per question of client, regarding California legal requirements re: race questions.	Attorney-Client privilege; Redacted material relays communication from lawyer to client regarding interpretation of California law.
38	HHS 02302674	05/21/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Fair Lending Notice.	Email correspondence requesting and relaying advice of Nancy J. Bromley regarding California fair lending notice and requirements of law.	Attorney-Client privilege; Email correspondence requesting and relaying advice of Nancy J. Bromley regarding California fair lending notice and requirements of law.
39	HHS 02303071	04/06/1998	Daniel J. Doyle (Policy and Compliance)	Jon J. Shrum (AVP Quality Assurance and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	California loan agreements.	Email requesting advice from Nancy Bromley, Esq. re: appropriate language for loan documents.	Attorney-Client privilege; Redacted material contains a request for legal advice from Nancy Bromley, Esq. re: appropriate language for loan documents.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
40	HHS 02303490- HHS 02303492							Document Has Been Produced.
41	HHS 02303494							Document Has Been Produced.
42	HHS 02303613 - HHS 02303614							Document Has Been Produced.
43	HHS 02303791 - HHS 02303792							Document Has Been Produced.
44	HHS 02303852	10/29/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Tracy Hortaisos (Policy and Compliance)	Jo Ann-Davis, Esq. (Household Counsel)	California lending law.	Email correspondence containing attorney's responses to questions regarding California lending law.	Attorney-Client privilege; Email correspondence containing attorney's responses to questions regarding California lending law.
45	HHS 02303912 - HHS 02303914	02/19/1999	Vincent A. Ruiz, Esq. (Gutierrez and Associates)	Martina Vargas (Policy and Compliance)	N/A	California customer survey.	Facsimile providing attorney comments and attorney sign off, as per request of client, re: California customer survey.	Attorney-Client privilege; Facsimile contains communication from attorney providing legal review and sign off for proposed changes to survey.
46	HHS 02303915 - HHS 02303918	02/19/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	Facsimile seeking attorney comments and attorney sign off re: California customer survey.	Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
47	HHS 02303921 - HHS 02303924	02/11/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	Facsimile seeking attorney comments and attorney sign off re: California customer survey.	Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.
48	HHS 02304525	12/21/1998	Lee Leggette, Esq. (Household Counsel)	Cynthia Weaver (Policy and Compliance)	N/A	Overlimit Fee Language for Check Loan Notes.	Memo from attorney to employee in the Policy and Compliance Department re: change to loan language.	Attorney-Client privilege; Memorandum provides legal advice to client regarding overlimit fee language for check note loans.
49	HHS 02305238- HHS 02305239	06/07/1999	Andrew M. Budish, Esq. (Senior Counsel)	John L. Morrisson (Policy and Compliance Support)	N/A	Truth In Lending Application Disclosure.	Email seeking and providing advice of attorney regarding draft Truth In Lending Application Disclosure, as per legal requirements, and attaching attorney comments to said documents.	Attorney-Client privilege; Redacted material contains an email exchange between attorney and client seeking advice regarding legal requirements for Truth in Lending Application Disclosure, and attaching attorney comments to said document.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
50	HHS 02306616	12/13/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	N/A	California law re: brokers' commissions.	Email between lawyer and Policy and Compliance Department asking questions and conveying approval for a bulletin board.	Attorney-Client privilege; Redacted material contains an email exchange between Household Legal Counsel and an employee seeking legal advice regarding a bulletin board re: broker commission checks.
51	HHS 02306624	12/13/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	Daniel J. Doyle (Policy and Compliance)	California law re: brokers' commissions.	Email from lawyer relaying interpretation of California law to Policy and Compliance department.	Attorney-Client privilege; Email from lawyer to client relaying interpretation of California law.
52	HHS 02306625 -	12/01/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	Daniel J. Doyle (Policy and Compliance)	California law re: brokers' commissions.	Email requesting and relaying advice from counsel regarding broker commission check.	Attorney-Client privilege; Redacted material contains email between lawyer and client relaying interpretation of California law re: broker commission checks.
53	HHS 02307964							Document Has Been Produced.
54	HHS 02308621							Document Has Been Produced.
55	HHS 02308924- HHS 02308925							Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
56	HHS 02309462	01/10/2002	Maryann E. Bennett (Unit Manager – Product Compliance)	Joanne Schaffeld (Manager – Policy Forms & Compliance)	Tom G. Sokan (Policy and Compliance Support) Connie M. Scott (Policy and Compliance Support) Maryann E. Bennett (Unit Manager – Product Compliance)	California insurance.	Email correspondence relaying legal advice of Jo Ann Davis, Esq. (Household Counsel) to client regarding language permitted for use in California insurance document.	Attorney-Client privilege; Redacted material relays legal advice of Jo Ann Davis, Esq. (Household Counsel) to client regarding language permitted for use in California insurance document.
57	HHS 02309527							Document Has Been Produced.
58	HHS 02310313	04/09/2001	Daniel J. Doyle (Policy and Compliance)	Tom G. Sokan (Policy and Compliance Support)	N/A	California sales finance contracts.	Email requesting and relaying advice of Nancy J. Bromley regarding California law on refinancing sales finance contracts.	Attorney-Client privilege; Email contains advice of an attorney responding to a question on a specific California rule.
59	HHS 02310481 - HHS 02310482	05/15/2001	Nancy J. Bromley, Esq. (Senior Counsel)	Brenda A. Garcia (Policy and Compliance)	N/A	California Parity Act.	Email correspondence requesting and relaying advice of Nancy Bromley, Esq. regarding the California Parity Act.	Attorney-Client privilege; Email contains advice of an attorney responding to a question on a specific California rule.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
60	HHS 02379109 - HHS 02379126	06/4/2002	Katie Moorshead, Esq. (HFC Law Department)	N/A	N/A	Civil Investigation Demand from the State of Arizona.	Attorney's notes used in preparing response to Civil Investigation Demand.	Work Product; Redacted material contains handwritten notes of Katie Moorshead, Esq. in preparation of response to requests of attorney general, including legal strategies, requests to be clarified and objections to requests.
61	HHS 02379385 - HHS 02379431	07/3/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and Leonard, LLP)	Household Legal Department	N/A	Arizona Civil Investigation Demand.	Draft response to Arizona Attorney General Demand faxed to Household by Household's outside counsel for review.	Work Product and Attorney-Client privilege; Draft letter containing initial response to Civil Investigation Demand, including draft responses and objections with handwritten legal comments.
62	HHS 02385615 - HHS 02385616							Document Has Been Produced.
63	HHS 02405727	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation by HUD re: Arizona complaints.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	Work Product and Attorney-Client privilege; Email contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.
64	HHS 02405728	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation by HUD re: Arizona complaints.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	Work Product and Attorney-Client privilege; Email contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
65	HHS 02405959	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation by HUD re: Arizona complaints.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	Work Product and Attorney-Client privilege; Email contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.
66	HHS 02405960	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation by HUD re: Arizona complaints.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	Work Product and Attorney-Client privilege; Email contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.
67	HHS 02406152	02/11/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaint filed with the Arizona Attorney General's office.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence reflecting questions from attorney regarding answering a complaint filed with the Arizona attorney general and forwarded to Household Legal Department by branch office for response.
68	HHS 02406344	04/17/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaints filed with the Arizona Attorney General's office.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence reflecting questions from attorney regarding answering complaints filed with the Arizona attorney general and forwarded to Household Legal Department for response.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
69	HHS 02406345 - HHS 02406346	04/17/2002	Tom G. Schneider (Director, Policy and Compliance Support)	Katie Moorshead, Esq. (HFC Law Department)		Complaints filed with the Arizona Attorney General's office.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence contains questions by Katie Moorshead, Esq. to Jessie D. McClure (Quality Assurance/Compliance Manager) and Ken A. Walker (National Quality Assurance Manager), and responses thereto, obtained for the purpose of answering complaints filed with the Arizona attorney general and forwarded to Household Legal Department for response.
70	HHS 02406347 - HHS 02406348	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible investigation by HUD re: Arizona Complaints.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	Work Product and Attorney-Client privilege; Email contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.
71	HHS 02406349							Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
72	HHS 02406373 - HHS 02406379	04/03/2002	Katie Moorshead, Esq. (HFC Law Department)	Rachel N. Grant (Assistant Sales Manager)  Mary B. Johnston (Director, Operations Support)  Kenneth T. Scruggs (Director - Government Relations (state))	Lisa M. Sodeika (VP - Consumer Affairs)  Jada M. Howard (Rapid Response)  Kathleen K. Curtin, Esq. (General Counsel)	Complaints filed with the Arizona Attorney General.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence contains legal strategy and attorney analysis of complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response; attaching emails to counsel from Kenneth T. Scruggs and Jada M. Howard summarizing and providing status of individual complaints.
73	HHS 02406667 - HHS 02406669	04/03/2002	Katie Moorshead, Esq. (HFC Law Department)	Rachel N. Grant (Assistant Sales Manager)  Mary B. Johnston (Director, Operations Support)  Kenneth T. Scruggs (Director - Government Relations (state))	Lisa M. Sodeika (VP - Consumer Affairs)  Jada M. Howard (Rapid Response)  Kathleen K. Curtin, Esq. (General Counsel)	Complaints filed with the Arizona Attorney General.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence contains legal strategy and attorney analysis of complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response.
74	HHS 02406926 - HHS 02406942	06/28/2002	Paula G. McGuire (Paralegal)	Marci M. Goldgar (Director Consumer Affairs)  Rose K. Patenaude (Director - Corporate Licensing)  Ron J. Stanko (Consumer Lending, Policy and Compliance)	Katie Moorshead, Esq. (HFC Law Department)  Susan S. Lindsey (Paralegal)	Arizona Attorney General Civil Investigation Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney Client Privilege; Email correspondence requesting information from individuals identified by Katie Moorshead, Esq. and reply emails relaying information from such individuals, as requested by counsel, to be incorporated in draft

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
				April S. Thorne (Policy and Compliance Support) Ellen E. Kirkham (Assistant Vice President – Financial Analysis) James J. O'Brien (Director – Credit Policy/Risk) Steve R. Nesbitt (Vice President – Human Resources) Richard J. Kolb (Director – Sales Support & MIS) Amanda K. Hines (Director – Payroll Operations) Martina Vargas (Policy and Compliance) John W. Blenke (VP Corporate Law and Assistant Secretary) Mary B. Johnston (Director, Operations Support) Thomas M. Detelich (MD - Consumer Lending) Larry H. Zell (Director – Policy & Compliance) Jo Ann Davis, Esq. (Household Counsel)				responses to Arizona Attorney General Civil Investigation Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
75	HHS 02406943	07/02/2002	Paula G. McGuire (Paralegal)	<p>Carla J. Madura (AVP – Policy Compliance Support)</p> <p>Lynne C. Zaremba (Paralegal)</p> <p>Jada M. Howard (Rapid Response)</p> <p>Loretta R. Abrams (National Director, Consumer Affairs)</p> <p>Patricia A. Wisniewski (Senior Human Resources Manager)</p> <p>Brad A. Firle (Senior Human Resources Manager)</p> <p>Susan S. Lindsey (Paralegal)</p>	N/A	Civil Investigation Demand from the State of Arizona.	Email correspondence regarding response to Arizona Civil Investigation Demand.	<p>Work Product and Attorney-Client privilege;</p> <p>Email correspondence forwarded by Paula G. McGuire is an email chain containing correspondence between Kathleen K. Curtin, Esq. (Household Counsel), Lindy B. Hood (Consumer Lending Policy) and Paula G. McGuire re: data to be included in preparation of draft response to the Arizona Attorney General Investigative Demand.</p>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
76	HHS 02406944 - HHS 02406955	N/A	Paula G. McGuire (Paralegal)	N/A	N/A	Civil Investigation Demand from the State of Arizona.	Document prepared to assist in Response to Civil Investigation Demand of Arizona Attorney General.	Work Product and Attorney-Client privilege; Document summarizing Civil Investigation Demand of attorney general. Redacted material concerns determination of objections, question regarding scope of Household's knowledge, and partial draft response. Document Has Been Produced.
77	HHS 02406999							
78	HHS 02407079- HHS 02407081	08/08/2002	Glen Boudreaux (Attorney, Boudreaux and Leonard, LLP)	Household Legal Department	N/A	Arizona Attorney General Civil Investigation Demand.	Draft response to Arizona Attorney General Demand faxed to Household by Household's outside counsel for review.	Work Product and Attorney-Client privilege; Draft letter containing initial response to Civil Investigation Demand, including draft responses and objections with handwritten legal comments.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
79	HHS 02407082 - HHS 02407087	07/05/2002	Paula G. McGuire (Paralegal)	Susan Lindsey (Paralegal)	N/A	Arizona Attorney General Civil Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney Client Privilege; Email forwards email correspondence requesting information from individuals, as requested by counsel, and reply emails relaying information from such individuals to be incorporated in draft responses to Arizona Attorney General Civil Investigation Demand.
80	HHS 02407088 - HHS 02407090	07/09/2002	Nancy J. Bromley, Esq. (Household Attorney)	Paula G. McGuire (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email from Nancy J. Bromley, Esq. requesting information from employees and forwarding response in connection with Arizona Attorney General investigation
81	HHS 02407241 - HHS 02407242	07/02/2002	Richard J. Kolb (Household Employee)	Paula G. McGuire (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel, replying with information to be incorporated in draft responses to Arizona Attorney General Civil Investigation Demand.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
82	HHS 02407435	07/03/2002	Paula G. McGuire (Paralegal)	Susan Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel, to be incorporated in draft responses to Arizona Attorney General Civil Investigation Demand.
83	HHS 02407442	06/05/2002	Shehad A. Mohammed (Responsible Lending)	Katie D. Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response) Mary B. Johnston (Director, Operations Support) Kathleen K. Curtin, Esq. (General Counsel) Paula McGuire (Paralegal)	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email correspondence between counsel and employees containing questions of counsel regarding complaints filed in Arizona and response of Household employee for the purpose of responding to Arizona Attorney General Investigative Demand.
84	HHS 02407443	06/05/2002	Shehad A. Mohammed (Responsible Lending)	Katie D. Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response) Mary B. Johnston (Director, Operations Support) Kathleen K. Curtin, Esq. (General Counsel) Paula G. McGuire (Paralegal)	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email correspondence between counsel and employees containing questions of counsel regarding complaints filed in Arizona and response of Household employee for the purpose of responding to Arizona Attorney General Investigative Demand.
85	HHS 02407445							Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
86	HHS 02407446- HHS 02407447	08/12/2002	Angela K. Boyle (Senior Credit/Policy Risk Analyst)	Katie D. Moorshead, Esq. (HFC Law Department)	Elizabeth A. De Paula Arias, Esq. (Household Counsel)	Civil Investigation Demand from the State of Arizona.	Email correspondence regarding Arizona Attorney General loans.	Work Product and Attorney-Client privilege; Email to counsel containing customer information for purposes of drafting responses re: Arizona Attorney General loans.
87	HHS 02407448	08/19/2002	David S. Curcio, Esq. (Attorney, Boudreaux and Leonard, LLP)	Katie D. Moorshead, Esq. (HFC Law Department)	N/A	Arizona Civil Investigation Demand.	Email from outside counsel relaying review and advice re: conciliation agreements with customers in Arizona.	Work Product and Attorney-Client privilege; Email correspondence between outside counsel and client containing counsel's review and advice re: settlements with customers in Arizona.
88	HHS 02407451 - HHS 02407503	08/06/2002	Glen Boudreaux (Attorney, Boudreaux and Leonard, LLP)	Household Legal Department	N/A	Arizona Civil Investigation Demand.	Draft response to Arizona Attorney General Demand faxed to Household by Household's outside counsel for review.	Work Product and Attorney-Client privilege; Draft letter containing initial response to Civil Investigation Demand, including draft responses and objections with handwritten legal comments.
89	HHS 02407504	08/02/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and Leonard, LLP)	Kathleen K. Curtin, Esq. (General Counsel)  Elizabeth A. De Paula Arias, Esq. (Household Counsel)	Tim S. Leonard, Esq. (Attorney, Boudreaux and Leonard, LLP)  David S. Curcio, Esq. (Attorney, Boudreaux and Leonard, LLP)	Arizona Fair Housing Settlements.	Email from outside counsel containing advice and relaying settlement terms.	Work Product and Attorney-Client privilege; Email correspondence between outside counsel and client containing review, advice and summary re: Arizona Fair Housing settlements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
90	HHS 02407505	08/02/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and Leonard, LLP)	Kathleen K. Curtin, Esq. (General Counsel) Elizabeth A. De Paula Arias, Esq. (Household Counsel)	Tim S. Leonard (Attorney, Boudreaux and Leonard, LLP) David Curcio, Esq. (Attorney, Boudreaux and Leonard, LLP)	Arizona Fair Housing settlements.	Email from outside counsel containing advice and relaying settlement terms.	Work Product and Attorney-Client privilege; Email correspondence between outside counsel and client containing review, advice and summary re: Arizona Fair Housing settlements.
91	HHS 02407507- HHS 02407509	07/18/2002	Thomas M. Detelich (MD - Consumer Lending)	Katie D. Moorshead, Esq. (HFC Law Department)	Kathleen K. Curtin, Esq. (General Counsel)	Complaints filed with the Arizona Attorney General.	Email correspondence regarding new complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence, including forwarded emails, containing facts relayed by household employees and attorney analysis of new complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response.
92	HHS 02407521	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq.), regarding scope of responsive documents to Arizona Attorney General Civil Investigation Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
93	HHS 02407523	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq.), regarding scope of responsive documents to Arizona Attorney General Civil Investigation Demand.
94	HHS 02407525	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq.), regarding scope of responsive documents to Arizona Attorney General Civil Investigation Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
95	HHS 02407533- HHS 02407534	07/02/2002	Connie M. Scott (Policy and Compliance Support)	Joanne M. Schaffeld (Manager - Policy Forms & Compliance)  Ron L. Bryar (Group Director - Sales)  Tim J. Titus (CFO/Director - Financial Control)  Gerard J. Lunemann (Actuarial Director)  Jo Ann Davis, Esq. (Household Counsel)	Maryann E. Bennett (Unit Manager - Product Compliance)  Nancy J. Bromley, Esq. (Senior Counsel)  Tom G. Schneider (Director, Policy and Compliance Support)  April S. Thorne (Policy and Compliance Support)	Civil Investigation Demand from the State of Arizona.	Email sent to obtain assistance in Responding to Civil Investigation Demand of Arizona Attorney General.	Work Product and Attorney-Client privilege; Document summarizing Civil Investigation Demand of attorney general, adding internal determination of objections to requests, which Household employees should bear responsibility for gathering materials and which employees should assist in drafting answers to each request.
96	HHS 02408188 - HHS 02408190	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	Email correspondence regarding response to Arizona Civil Investigation Demand.	Work Product and Attorney Client Privilege; Email forwards email correspondence requesting information from individuals, as requested by counsel, and reply emails relaying information from such individuals to be incorporated in draft responses to Arizona Attorney General Civil Investigation Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
97	HHS 02408662	02/08/2002	Katie D. Moorhead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaint filed with the Arizona Attorney General's office.	Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence reflecting questions from attorney regarding answering a complaint filed with the Arizona attorney general and forwarded to Household Legal Department by branch office for response.
98	HHS 02408832 - HHS 02408834	07/29/2002	Angela Miracle (Senior Legal Secretary)	Chris C. Snyder (Director for Mortgage Services Wholesale P&C Support; Household Attorney)	Jeffrey S. Bransford (Wholesale Mortgage Processor)  Douglas A. Friedrich (Managing Director-Specialty finance)  Sarah M. Harris (Wholesale Collections)  Margo J. Hickman (Corporate Risk Management)  Loren J. Morris (HMS Business Development)  John J. O'Brien (Consultant - Business Systems)  Sean A. Rockway (Policy and Compliance)  Chris K. Worwa (Controllers Group)	<i>Ciccarelli v. Household Mortgage Services, Residential Money Centers, Inc. and Gettysburg Funding, Inc.</i>	Email attaching summary and analysis with respect to pending litigation.	Work Product and Attorney-Client Privilege; summary of a pending litigation prepared by an attorney.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
99	HHS 02408835	04/11/2002	Jean S. Raisbeck (Policy and Compliance)	Keith A. Clardy (HFC-Training and Communications)	Winslow Thomas S. (HMS Business Development) John W. Blenke (Corporate Legal Department) Gregory A. Gibson (Wholesale Operations) Elaine H. Markell (Wholesale Default Services) Ashraf R. Ibrahim (Mortgage Services REO) Andrew M. Budish, Esq. (Senior Counsel)	Price Options Training	Communicate to recipients legal advice regarding price options training, including discussion of when the idea of discount points should be raised.	Attorney-Client privilege; Email reflecting legal advice of Andrew M. Budish, Esq., as communicated to clients, regarding necessary requirements for employees to follow when discussing discount points.
100	HHS 02408836							Document Has Been Produced.
101	HHS 02408837							Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
102	HHS 02408838 - HHS 02408840	03/29/2002	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)	N/A	Price Operations form and Training Materials.	Communicate to recipients legal advice regarding price options training, including discussion of when the idea of discount points should be raised.	Attorney-Client privilege: Email reflecting questions to and legal advice of Andrew M. Budish, Esq., regarding necessary requirements for employees to follow when discussing discount points.
103	HHS 02408842 - HHS 02408843	03/28/2002	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)	N/A	Price Operations form and Training Materials.	Communicate to recipients legal advice regarding price options training, including discussion of when the idea of discount points should be raised.	Attorney-Client privilege: Email reflecting questions to and legal advice of Andrew M. Budish, Esq., regarding necessary requirements for employees to follow when discussing discount points.
104	HHS 02408847 - HHS 02408848							Document Has Been Produced.
105	HHS 02408849 - HHS 02408855	04/06/1999	Regina A. Nowlan (Training and Communications)	Kathleen K. Curtin, Esq. (General Counsel)	N/A	Advanced Sales Training Legal Review.	Memo forwarding training materials as per request of counsel.	Attorney-Client privilege; Memo forwarding training information for legal review, including handwritten notes regarding a conversation with counsel.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
106	HHS 02408856	05/28/2001	Bernie D. Wilson (HFC Real Estate Collections)	Thais M. McClain (Training and Development Department Manager)	Chris A. Snyder (Vice President in Collections - Consumer Lending)	Fair Debt Collection Practices Act.	Email relaying advice of counsel re: FDCPA compliance.	Attorney-Client privilege; Redacted material for-wards email containing legal advice of Andrew Budish, Esq. (Senior Counsel) re: compliance with Fair Debt Collection Practices Act.
107	HHS 02408867 - HHS 02408868	02/2/2000	Michael Mulconrey (National Training Manager)	Anne Marie Marks (B/U Training & Development Manager)	N/A	Mini-Miranda warnings.	Communicate to client regarding state law requirements regarding mini-Miranda warnings.	Attorney-Client privilege; Facsimile enclosing memorandum from Andrew Budish, Esq. (Senior Counsel) to George Wilson (MD-Consumer Lending Operations) regarding application of state laws re: Mini-Miranda Warnings. Memo follows up on an earlier discussion on mini-Miranda warnings.
108	HHS 02408869 - HHS 02408871	11/1/1999	Andrew M. Budish, Esq. (Senior Counsel)	Bernie Wilson (HFC Real Estate Collections) Chris Snyder (Vice President in Collections - Consumer Lending) Mike Marks (VP - Collections) David Little (MD - Consumer Lending Operations) Kathy Huston (Unit Manager - Collections)	N/A	Mini-Miranda warnings.	Communicate to client regarding state law requirements regarding mini-Miranda warnings.	Attorney-Client privilege; Redacted material contains a memo providing analysis regarding application of state laws re: Mini-Miranda Warnings, including attorney's recommendations.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
109	HHS 02408875	01/31/2000	Andrew M. Budish, Esq. (Senior Counsel)	George Wilson (MD - Consumer Lending Operations)	N/A	Mini-Miranda warnings.	Communicate to client regarding state law requirements regarding mini-Miranda warnings.	Attorney-Client privilege; Memorandum from Andrew Budish, Esq. (Senior Counsel) to George Wilson (MD-Consumer Lending Operations) regarding application of state laws re: Mini-Miranda Warnings. Memo follows up on an earlier discussion on mini-Miranda warnings.
110	HHS 02408876 - HHS 02408878	11/1/1999	Andrew M. Budish, Esq. (Senior Counsel)	Bernie Wilson (HFC Real Estate Collections) Chris Snyder (Vice President in Collections - Consumer Lending) Mike Marks (VP - Collections) David Little (MD - Consumer Lending Operations) Kathy Huston (Unit Manager - Collections)	N/A	Mini-Miranda warnings.	Communicate to client regarding state law requirements regarding mini-Miranda warnings.	Attorney-Client privilege; Memoranda from Senior Counsel to employees regarding application of state laws re: Mini-Miranda Warnings, including attorney's recommendations.
111	HHS 02408880 - HHS 02408887	07/22/2002	Andrew M. Budish, Esq. (Senior Counsel)	Mike J. Mulconrey (National Training Manager)	N/A	U.S. Fair Debt Collection Practices Act.	Communicate to Policy and Compliance Department regarding legal review of a training manual concerning compliance with the FDCPA.	Attorney-Client privilege; Redacted material contains handwritten notes and comments of Andrew M. Budish to a section of a training manual made to ensure compliance with federal law.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
112	HHS 02408888 - HHS 02408894	5/20/2002	Kathleen K. Curtin, Esq. (General Counsel)  Lorraine Bieber (Regional Director - Underwriting)  M.A. Dougherty (Approving Executive Sponsor)	M.A. Dougherty (Approving Executive Sponsor)  Ken Cashmer (Regional Director - Quality Control)	N/A	Title and Appraisal work; Collateral guide-lines.	Communicate to Policy and Compliance Department regarding legal review of a training manual concerning compliance with the FDCA.	Attorney-Client privilege; Draft training manual contains changes of Kathleen K. Curtin, Esq., M.A. Dougherty and Lorraine Bieber, as determined during a meeting between the three.

# Exhibit C

## Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.

Lead Case No. 02-C5893 (Consolidated)

**Second Revised** Third REVISED First Privilege Log of the Household Defendants~~May 18, June 23, 2005~~

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
1	<del>HHS 02201493</del> <del>HHS 02201494</del>	N/A	<del>Andrew M. Budish, Esq. (Senior Counsel)</del> <del>Elizabeth De Paula Arias, Esq. (Household Counsel)</del>	N/A	N/A	<del>Price Options Form</del>	<del>Education and training of employees.</del>	<del>Attorney-Client privilege: Redacted material contains handwritten notes reflecting suggested changes of Andrew M. Budish, Esq. and Elizabeth De Paula Arias, Esq. to draft Price Options Form Document Has Been Produced.</del>
2	HHS 02201551	N/A	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC- Training and Communications) <u>Jean S. Raisbeck (Policy and Compliance)</u>	N/A	Price Options Training and Trainings	Education and Communicate to recipients legal review and questions regarding content of worksheets used for training of employees regarding Price Options, as per request of clients.	Attorney-Client privilege: Redacted material contains handwritten notes communicated to recipient from attorney reflecting legal review of training worksheets and suggesting changes to content of training manual thereto, including references to legal requirements of Washington and New York.
3	HHS 02201555							Document Has Been Produced.
4	HHS 02201556	N/A	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC- Training and Communications)	N/A	Price Options Training	Education and training of employees.	Attorney-Client privilege: Redacted material contains email relaying legal review

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
5	HHS 02201653	<del>04/11/2002</del>	Jean S. Raisbeck (Policy and Compliance)	Jean S. Raisbeck (Policy and Compliance) Andrew M. Budish, Esq. (Senior Counsel) Keith A. Clardy (HFC-Training and Communications)	N/A	Price Options Training and Point Training	Education and training of employees. Communicate to recipients legal advice regarding price options, including necessary requirements for employees to follow when discussing discount points, in order to be compliant with the law.	of training worksheets Document Has Been Produced. Attorney-Client privilege; Email reflecting legal review of training worksheets and suggesting changes to content of training manual advice of Andrew M. Budish, Esq., as communicated to clients, regarding necessary requirements for employees to follow when discussing discount points, in order to be compliant with the law.
6	HHS 02217827- HHS 02217828	<del>10/6/1999</del>	Regina A. Nowlan (Training and Communications)	Kathleen K. Curtin, Esq. (General Counsel)	N/A	Transcript of training video.	Request for attorney to review training materials.	Attorney-Client privilege; Redacted material contains handwritten notes regarding legal review of a training video. transcript Document Has Been Produced.
7	HHS 02232531- HHS 02232541	03/09/2001	Victor H. Miller, Esq. (Legal Department) Sally Holloway, Esq. (Legal Department)	Kathy Ruhaak (Learning and Development Instructional Designer)	N/A	Fair Debt Collection Practices Act (FDCPA)	Education and training of employees. Communicate to Kathy Ruhaak regarding legal review of a training manual in	Attorney-Client privilege; Material Redacted material contains a handwritten memo from Victor H. Miller, Esq. and a draft of training manual containing handwritten notes and comments of Sally A. Holloway, Esq.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
8	HHS 02232542- HHS 02232559	N/A	<del>N/A</del> Sally Holloway, Esq. (Legal Department)	<del>N/A</del> Policy and Compliance Department	N/A	Fair Debt Collection Practices Act- (FDCPA)	order to insure compliance with the FDCPA, <del>Education and training of employees-Co</del> communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	<u>communicated to client and written to ensure compliance with federal law.</u> Attorney-Client privilege; <del>Draft of training manual re: FDCPA, containing Redacted</del> material contains handwritten notes and comments of Sally A. Holloway, Esq., <del>suggesting changes to the manual which were</del> communicated to the client, and written to insure compliance with federal law.
9	HHS 02232561- HHS 02232570	N/A	<del>N/A</del> Sally Holloway, Esq. (Legal Department)	<del>N/A</del> Policy and Compliance Department	N/A	Fair Debt Collection Practices Act- (FDCPA)	<del>Education and training of employees-Co</del> communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; <del>Draft of training manual re: FDCPA, containing Redacted</del> material contains handwritten notes and comments of Sally A. Holloway, Esq., <del>suggesting changes to the manual—which were</del> communicated to the client, and written to insure compliance with federal law.
10	HHS 02232571- HHS 02232572							Document Has Been Produced.
11	HHS 02232842-	04/21/2000	Victor H. Miller,	<del>N/A</del> Kathy Ruhhaak (Learning	N/A	Fair Debt	<del>Education and</del>	Attorney-Client privilege;

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
	HHS <del>02232899</del> 022328 87		Esq. (Legal Department)	<u>and Development Instructional Designer</u>		Collection Practices Act- (FDCPA)	<del>training of employees</del> Communicate to <u>Kathy Ruhaak</u> regarding <u>legal review of a training manual in order to insure compliance with the FDCPA.</u>	<del>Draft of training manual for legal compliance procedures;</del> <del>including</del> <u>Redacted</u> material contains handwritten notes and comments of Victor H. Miller, Esq. <u>which were communicated to the client and written to insure compliance with federal law.</u>
12	HHS 02232890- HHS 02232938	03/31/2000	Victor H. Miller, Esq. (Legal Department)	<del>N/A</del> <u>Kathy Ruhaak (Learning and Development Instructional Designer)</u>	N/A	Fair Debt Collection Practices Act- (FDCPA)	<del>Education and training of employees</del> Communicate to <u>Kathy Ruhaak</u> regarding <u>legal review of a training manual in order to insure compliance with the FDCPA.</u>	Attorney-Client privilege; <del>Draft of training manual for legal compliance procedures;</del> <del>including</del> <u>Redacted</u> material contains handwritten notes and comments of Victor H. Miller, Esq. <u>which were communicated to the client and written to insure compliance with federal law.</u>
13	HHS 02233092- HHS 02233095	02/02/2000	<del>Andrew M. Budish, Esq. (Senior Counsel)</del> <u>Kathy Ruhaak (Learning and Development Instructional Designer)</u>	<del>George Wilson</del> <u>Anne Marie Marks (ADD-Cosumer Lending-Operations B/U Training &amp; Development Manager)</u>	<del>Kathleen K. Curtin, Esq. (General Counsel)</del> <u>N/A</u>	Fair Debt Collection Practices Act- (FDCPA) <u>Changes and Mini Miranda Warnings</u>	<del>Education and training of employees</del> Communicate to <u>client</u> regarding <u>state law requirements regarding mini-Miranda warnings.</u>	Attorney-Client privilege; <del>Facsimile enclosing draft of training manual re: FDCPA, prepared for attorney review; and enclosing draft</del> <u>Redacted</u> material encompassing memos from Andrew Budish, Esq. <del>re: state laws on</del> (1) <u>George Wilson</u> and <u>Kathleen Curtin</u> and (2) <u>Bernie D. Wilson</u>



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				To	CC/BCC			
14	HHS 02290819	05/12/1999	Andrew M. Budish, Esq. (Senior Counsel)	Martina Vargas (Policy and Compliance)	N/A	Alabama loan agreements.	Email correspondence requesting and relaying attorney comments to Alabama loan agreements.	<u>(HFC Real Estate Collections), Chris Snyder (Policy and Compliance), Mike Marks (VP - Collections), David Little (MD - Consumer Lending Operations), and Kathy Huston (Unit Manager - Collections) regarding application of state laws re: Mini-Miranda Warnings.</u> Attorney-Client privilege; Email regarding loan language and application of Alabama law.
15	HHS 02291392	05/05/2000	Sandra Iniguez (Manager - Systems Quality Assurance)	Robert P. O'Han (HFC Sales)	Krista M. Eads (Executive Assistant)	Alabama insurance and loan information.	Email relaying advice of legal department re: draft bulletin board.	<del>Attorney-Client privilege; Redacted material relays legal advice to be incorporated in draft document.</del> Document Has Been Produced.
16	HHS 02291884 - HHS 02291898	04/05/2002	Andrew M. Budish, Esq. (Senior Counsel)	EFS (Electronic Forms Systems), Part of Policy and Compliance, headed by Marian Iverson.	N/A	Loan language, agreement forms, and forms in Lending Disclosure s, FMP Pilot Loan Agreement	Attorney comments regarding loan language communication to client of attorney's edits and comments to draft loan documents, based on legal	Attorney-Client privilege; Redacted material <del>contains</del> communicates attorney comments and edits to draft loan language to client, based on legal requirements of state and federal law.

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				To	CC/BCC			
17	HHS 02294030 - HHS 02294031	08/20/1998	Andrew M. Budish, Esq. (Senior Counsel)	Cindy Silver (Policy and Compliance)	N/A	Home Equity Credit Line Revolving Loan Agreement	Redacted material providing attorney sign-off of loan agreement.	Attorney-Client privilege; Redacted material reflects attorney comments and attorney sign-off re: loan agreement Document Has Been Produced.
18	HHS 02294279	08/20/1998	Andrew M. Budish, Esq. (Senior Counsel)	Cindy Silver (Policy and Compliance)	N/A	Arizona pre-payment penalty.	Email providing attorney sign-off and comments re: pre-payment penalty section of loan agreement.	Attorney-Client privilege; Email reflects attorney comments and attorney sign-off re: pre-payment penalty section of loan agreement Document Has Been Produced.
19	HHS 02294333	03/01/1999	Elizabeth De Paula Arias, Esq. (Household Counsel)	Sherry L. Woodson (Policy and Compliance)	William Connolly (Senior Manager - Customer Information Management)	Arizona Consumer Contracts law.	Email correspondence requesting and relaying edits to Arizona loan documents based on application of Arizona law.	Attorney-Client privilege; Email between lawyer and client regarding Arizona Consumer Contracts and application of Arizona law.
20	HHS 02294873 -	01/04/2000	Jim D. Pommier	Elizabeth De Paula Arias, Esq.	Robert P. Norwich (Policy)	Arizona	Email	Attorney-Client privilege;

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
	HHS 02294874		(Policy and Compliance)	(Household Counsel)	and Compliance)	<del>loan issues</del> ; <u>Per</u> <u>sonal Home Loans</u>	correspondence <del>re: edits to Arizona loan documents</del> ; <u>regarding and providing advice regarding Arizona loans, including application of state and federal law, and including handwritten notes re: same.</u>	Email between lawyer and client requesting and providing advice regarding Arizona loan documents, including advice re: application of Arizona state and federal law.
21	HHS 02299144 - HHS 02299145	04/04/2002	<del>Celia Gomez (Consumer Lending)</del>	<del>Katie Moorshead, Esq. (HFC Law Department)</del>	N/A	Arizona loan documents;	<del>Facsimile cover sheet requesting advice and reapplying earlier discussion with attorney.</del>	<del>Attorney-Client privilege; Facsimile cover sheet requests advice and recaps earlier discussion between lawyer and client re: loan language Document Has Been Produced.</del>
22	HHS 02299305 - HHS <del>02299307</del> 02299306	04/11/2002	Katie Moorshead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	<del>Isabel Pietri-Isabelle (Assistant Vice President - Policy &amp; Compliance Support) N/A</del>	Iowa loan document; <u>Loan Repayment and Security Agreement</u>	Email correspondence <del>re: edits to requesting and providing advice, edits and comments to client regarding Iowa loan documents as per legal requirements.</del>	Attorney-Client privilege; Email correspondence between lawyer and client <del>regarding sign-off on</del> requesting and providing attorney advice, edits and comments to Iowa loan documents as per legal requirements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
23	HHS 02299315 - HHS <del>02299324</del> 02299318	03/25/2002	Katie Moorshead, Esq. (HFC Law Department)	Adrian L. Bolding (Policy and Compliance Specialist)	Celia Gomez (Consumer Lending)	Iowa <del>loan document</del> <del>re: Loan Repayment and Security Agreement</del>	<del>Email</del> <del>correspondence</del> <del>re: edits to Communications requesting and providing attorney advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.</del>	Attorney-Client privilege; <del>Email</del> <del>Redacted material</del> contains email between lawyer and client <del>regarding application of Iowa law, and</del> <del>edit</del> <del>requesting and</del> <del>providing legal advice, edits and comments to Iowa loan</del> <del>agreements, including</del> <del>documents, and</del> <del>approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.</del>
24	HHS 02299325 - HHS 02299332	04/01/2002	Katie Moorshead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	N/A	Iowa <del>loan document</del> <del>re: Loan Repayment and Security Agreement</del>	<del>Email</del> <del>correspondence</del> <del>re: Communications requesting and providing attorney advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.</del>	Attorney-Client privilege; <del>Email</del> <del>Redacted material</del> contains email between lawyer and client <del>regarding sign-off</del> <del>on</del> <del>requesting and</del> <del>providing legal advice, edits and comments to Iowa loan documents, and</del> <del>includes comments and approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
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25	HHS 02300741 - HHS 02300742	09/11/2002	Lidia Lemus (Policy and Compliance) Donna L. Radzik, Esq. (Household Counsel)	Donna L. Radzik, Esq. (Household Counsel) Lidia Lemus (Policy and Compliance) Andrew M. Budish, Esq. (Senior Counsel)	G.D. Rauenbuehler (Manager - Policy & Compliance Support) Jim D. Pommier (Policy and Compliance Support) Daniel J. Doyle (Policy and Compliance) Isabel Pierri-Isabelle (Assistant Vice President - Policy & Compliance Support) Martina Vargas (Policy and Compliance) Cynthia L. Weaver (Policy and Compliance) N/A	Loan language for Contract Rates.	Email correspondence reflecting attorney comments and attorney sign off re-requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan language, as per legal requirements.	Attorney-Client privilege; Redacted material contains an email relaying attorney comments email correspondence requesting and providing attorneys advice regarding draft loan language, as per legal requirements.
26	HHS 02300745- HHS 02300746	09/10/2002	Donna L. Radzik, Esq. (Household Counsel)	Lidia Lemus (Policy and Compliance)	N/A	Loan language for Contract Rates.	Email correspondence reflecting attorney comments re: loan language requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan	Attorney-Client privilege; Redacted material contains email between attorney and clients correspondence requesting and providing advice of attorneys regarding draft loan language, as per legal requirements.

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27	HHS 02300771 - HHS 02300772	08/15/2002	Andrew M. Budish, Esq. (Senior Counsel)	Sean E. Casey (Assistant Manager - Policy & Compliance Support)	N/A	Illinois Revolving Real Estate and PHL <del>forms</del> <del>For</del> <del>ms</del>	Email correspondenc e <del>requesting</del> <del>attorney review</del> <del>and advice re: loan</del> <del>and advice re: loan</del> <del>agreement forms</del> <del>Redacted</del> <del>material contains email</del> <del>correspondence requesting</del> <del>and providing advice of</del> <del>attorney regarding draft</del> <del>loan language. as per legal</del> <del>requirements.</del> g and <u>providing</u> <u>advice of</u> <u>Andrew M. Budish</u> <u>regarding draft</u> <u>loan language.</u> <u>as per legal</u> <u>requirements.</u>	Attorney-Client privilege; <del>Email contains attorney</del> <del>review and advice re: loan</del> <del>agreement forms</del> <del>Redacted</del> <del>material contains email</del> <del>correspondence requesting</del> <del>and providing advice of</del> <del>attorney regarding draft</del> <del>loan language. as per legal</del> <del>requirements.</del>
28	HHS 02301553 - HHS 02301554	09/05/1997	Jeff Wood, Esq. (Law Department)	Stephen P. Pickett (Southwestern Unit Manager)	Daniel J. Doyle (Policy and Compliance) <del>David W. Urbane</del> <del>(Policy and Compliance Support)</del>  Tom G. Schneider (Director, Policy and Compliance Support)  Lee Leggette, Esq. (Household Counsel)  Jo Ann Davis, Esq. (Household Counsel)  Kathleen K. Curtin, Esq. (General Counsel)	Household loan policies for California Commercial Properties.	Email correspondenc e requesting and relaying attorney advice <u>to client</u> regarding Household loan policies, <u>as per</u> <u>requirements</u> <u>of California</u> <u>law.</u>	Attorney-Client privilege; Redacted material requests and relays advice from attorney to client regarding Household loan policies, <u>as per requirements of California law.</u>

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				To	CC/BCC			
29	HHS 02301983	01/13/1998	Nancy J. Bromley, Esq. (Senior-Counsel)	Cynthia M. Silver (Policy and Compliance)	Thomas M. Detelich (MD - Consumer Lending) Dave J. Philipps (Policy and Compliance Support) John J. Berwanger, Esq. (HFC Law) Patrick F. Zenzola (Government Relations - California)	Escrow law in California	Email from Nancy J. Bromley, Esq. regarding draft of California Escrow Document Preparation memo.	Attorney-Client privilege; Redacted material relays legal advice re: draft loan memo Document Has Been Produced.
30	HHS 02302527	04/11/30/26/1998 1997	John J. Berwanger, Esq. (HFC Law) Shehad A. Mohammed (Responsible Lending)	Shehad A. Mohammed (Responsible Lending) Cindy M. Brown (Household employee)	N/A	California sales forms.	Email chain containing question to attorney John J. Berwanger, Esq. (HFC Law), and attorney answer, regarding question regarding use of form under California law.	Attorney-Client privilege; Email between lawyer and client regarding interpretation of California law.
31	HHS 02302532	04/30/1998	Nancy J.	Cynthia M. Silver (Policy and Compliance)	N/A	California	Email	Attorney-Client privilege;

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				To	CC/BCC			
32	HHS 02302533	04/17/1998	Bromley, Esq. (Senior Counsel)	Compliance)		fair lending law.	containing question to attorney answer, <del>regarding</del> <del>question</del> regarding California fair lending law.	Email between lawyer and client regarding application of California Fair Lending law.
33	HHS 02302534 - HHS 02302535	<del>12/02/04</del> 12/17/1998	Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Email containing question to attorney <del>regarding</del> <del>question</del> regarding California fair lending law.	Attorney-Client privilege; Email between lawyer and client regarding application of California Fair Lending law.
			Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Facsimile containing email seeking and <del>relaying</del> <del>providi</del> ng legal advice <del>on</del> <del>from</del> <del>Nancy</del> <del>J.</del> <del>Bromley</del> , Esq., John J. Berwanger, Esq., (HFC Law) and Jeff Wood, Esq. (Law Department) regarding California fair lending law.	Attorney-Client privilege; Communication between <del>lawyer</del> lawyers and client regarding interpretation of California law.



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34	HHS 02302538 - HHS 02302539	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	Kathleen K. Curtin, Esq. (General Counsel)	California fair lending law.	Email correspondence requesting and <del>relaying</del> <del>advice</del> providing legal advice from John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) regarding California fair lending law.	Attorney-Client privilege; Redacted material contains email between <del>lawyers</del> lawyers and client regarding application of California law.
35	HHS 02302542 - HHS <del>02302544</del> 02302543	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	N/A	California fair lending law.	Facsimile containing email <del>seeking</del> requesting and providing legal advice from John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) on California fair lending law.	Attorney-Client privilege; Redacted material contains a communication between lawyer and client regarding interpretation of California law.
36	HHS 02302595 - <del>HHS-02302596</del>	05/07/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Trustee	Email seeking and providing legal advice from Nancy J.	Attorney-Client privilege; <del>Email</del> Redacted material contains a communication between lawyer and client

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37	HHS 02302672	04/28/1998	Daniel J. Doyle (Policy and Compliance)	Jon R. Shrum (AVP Quality Assurance and Compliance)	Cindy M. Brown (Household employee) Dave J. Philipps (Policy and Compliance Support)	California <del>loan</del> <del>issue</del> <u>law</u> re: <u>questions concerning a race in connection with certain loans.</u>	Email correspondenc e relating legal advice of Nancy J. Bromley, Esq. (Senior Counsel) and John Berwanger, Esq. (HFC Law), as per <u>question of client, regarding California <del>loan</del> <del>issue</del> <u>legal requirements re. race</u> questions.</u>	Attorney-Client privilege; Redacted material relays communication <del>between</del> <u>from</u> lawyer <del>and</del> <u>client</u> regarding interpretation of California law.
38	HHS 02302674	05/21/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Fair Lending Notice.	Email correspondenc e <u>requesting and relaying advice of Nancy J. Bromley</u> regarding California fair lending notice and <u>requirements of law.</u>	Attorney-Client privilege; Email <del>between lawyer and client</del> <u>correspondence requesting and relaying advice of Nancy J. Bromley</u> regarding <del>interpretation of</del> <u>California law</u> <u>fair lending notice and requirements of law.</u>

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39	HHS 02303071	04/06/1998	Daniel J. Doyle (Policy and Compliance)	Jon J. Shrum (AVP Quality Assurance and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	California loan agreements.	Email requesting advice from Nancy Bromley, Esq. re: appropriate language for loan documents.	Attorney-Client privilege; Redacted material <del>request</del> contains a request for legal advice re: from Nancy Bromley, Esq. re: appropriate language for loan documents.
40	HHS 02303490- HHS 02303492	11/15/1999	Dave J. Philipps (Policy and Compliance Support)	Jo Ann Davis, Esq. (Household Counsel)	N/A	Loan Chart Report.	Facsimile requesting and relaying advice from counsel.	Attorney-Client privilege; Facsimile demonstrates request and receipt of legal advice re: loan chart report. Document Has Been Produced.
41	HHS 02303494	11/15/1999	Dave J. Philipps (Policy and Compliance Support)	Jo Ann Davis, Esq. (Household Counsel)	N/A	Loan Agreement.	Facsimile seeking advice from counsel.	Attorney-Client privilege; Redacted material seeks legal advice re: loan document language. Document Has Been Produced.
42	HHS 02303613 - HHS 02303614	10/07/1998	Kathy Thompson (Legal Secretary to Loren Morris, Esq., Nancy J. Bromley, Esq. (both Household Counsel) and Mary Winslow (Household paralegal))	Bill Connolly (Senior Manager - Customer Information Management)	N/A	Facsimile discussing California lending law.	Facsimile to counsel seeking advice re: new California law.	Attorney-Client privilege; Redacted material contains a facsimile seeking advice of counsel re: new California law. Document Has Been Produced.
43	HHS 02303791 - HHS 02303792	11/12/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Tracy Hortatos (Policy and Compliance)	N/A	California lending law.	Facsimile containing attorney comments to proposed update re:	Attorney-Client privilege; Facsimile contains attorney comments regarding proposed update re: California lending law. Document Has Been Produced.

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44	HHS 02303852	10/29/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Tracy Hortatsos (Policy and Compliance)	Jo Ann Davis, Esq. (Household Counsel)	California lending law.	<p><del>California</del>                      Email correspondence containing attorney's responses to questions regarding California lending law.</p> <p><del>Produced.</del></p>	
45	HHS 02303912 - HHS 02303914	02/19/1999	Vincent A. Ruiz, Esq. (Gutierrez and Associates)	Martina Vargas (Policy and Compliance)	N/A	California customer survey.	<p>Attorney-Client privilege; Facsimile contains communication <del>to</del> <u>from</u> attorney <del>requesting</del> <u>providing</u> legal review and sign off for proposed changes to survey.</p>	
46	HHS 02303915 - HHS 02303918	02/19/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	<p>Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.</p>	
47	HHS 02303921 - HHS 02303924	02/11/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	<p>Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.</p>	

*Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al.*  
 Lead Case No. 02-C5893 (Consolidated)  
**Second Revised Third REVISED First Privilege Log of the Household Defendants**  
May 18, June 23, 2005

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				To	CC/BCC			
1	HHS-02201493- HHS-02201494	N/A	Andrew M. Budish, Esq. (Senior Counsel)  Elizabeth De Paula-Arias, Esq. (Household Counsel)	N/A	N/A	Price Options Form	Education and training of employees.	Attorney-Client privilege: Redacted material contains handwritten notes reflecting suggested changes of Andrew M. Budish, Esq. and Elizabeth De Paula-Arias, Esq. to draft Price Options Form Document Has Been Produced.
2	HHS 02201551	N/A	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)  Jean S. Raisbeck (Policy and Compliance)	N/A	Price Options Training and Point Training	Education and Communicate to recipients legal review and questions regarding content of worksheets used for training of employees regarding Price Options, as per request of clients.	Attorney-Client privilege: Redacted material contains handwritten notes communicated to recipient from attorney reflecting legal review of training worksheets and suggesting changes to content of training manual thereto including references to legal requirements of Washington and New York.
3	HHS 02201555							Document Has Been Produced.
4	HHS 02201556	N/A	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)	N/A	Price Options Training	Education and training of employees.	Attorney-Client privilege: Redacted material contains email relating legal review

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
5	HHS 02201653	<del>04/11/02</del> 002	Jean S. Raisbeck (Policy and Compliance)	Jean S. Raisbeck (Policy and Compliance)	N/A	Price Options Training and Point Trainings	Education and training of employees. Communicate to recipients legal advice regarding price options, including necessary requirements for employees to follow when discussing discount points, in order to be compliant with the law.	of training worksheets Document Has Been Produced. Attorney-Client privilege: Email reflecting legal review of training worksheets and suggesting changes to content of training manual. Advice of Andrew M. Budish, Esq., as communicated to clients, regarding necessary requirements for employees to follow when discussing discount points, in order to be compliant with the law.
6	HHS 02217827- HHS 02217828	10/6/1999	Regina A. Nowlan (Training and Communications)	Kathleen K. Curtin, Esq. (General Counsel)	N/A	Transcript of training video.	Request for attorney to review training materials.	Attorney-Client privilege; Redacted material contains handwritten notes regarding legal review of a training video transcript. Document Has Been Produced.
7	HHS 02232531- HHS 02232541	03/09/2001	Victor H. Miller, Esq. (Legal Department)  Sally Holloway, Esq. (Legal Department)	Kathy Ruhaak (Learning and Development Instructional Designer)	N/A	Fair Debt Collection Practices Act (FDCPA)	Education and training of employees. Communicate to Kathy Ruhaak regarding legal review of a training manual in	Attorney-Client privilege; Redacted material contains a handwritten memo from Victor H. Miller, Esq. and a draft of training manual containing handwritten notes and comments of Sally A. Holloway, Esq.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
8	HHS 02232542- HHS 02232559	N/A	<del>N/A</del> Sally Holloway, Esq. (Legal Department)	<del>N/A</del> Policy and Compliance Department	N/A	Fair Debt Collection Practices Act- (FDCPA)	order to insure compliance with the FDCPA, <del>Education and training of employees-Co</del> communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	<u>communicated to client and written to ensure compliance with federal law.</u> Attorney-Client privilege; <del>Draft of training manual re: FDCPA, containing Redacted</del> material contains handwritten notes and comments of Sally A. Holloway, Esq., <del>suggesting changes to the manual</del> which were communicated to the client and written to insure compliance with federal law.
9	HHS 02232561- HHS 02232570	N/A	<del>N/A</del> Sally Holloway, Esq. (Legal Department)	<del>N/A</del> Policy and Compliance Department	N/A	Fair Debt Collection Practices Act- (FDCPA)	<del>Education and training of employees-Co</del> communicate to Policy and Compliance Department regarding legal review of a training manual in order to insure compliance with the FDCPA.	Attorney-Client privilege; <del>Draft of training manual re: FDCPA, containing Redacted</del> material contains handwritten notes and comments of Sally A. Holloway, Esq., <del>suggesting changes to the manual</del> —which were communicated to the client and written to insure compliance with federal law.
10	HHS 02232571- HHS 02232572							Document Has Been Produced.
11	HHS 02232842-	04/21/2000	Victor H. Miller,	<del>N/A</del> Kathy Ruhhaak (Learning	N/A	Fair Debt	<del>Education and</del>	Attorney-Client privilege;

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
	HHS <del>02232899</del> 022328 87		Esq. (Legal Department)	<u>and Development Instructional Designer</u>		Collection Practices Act- (FDCPA)	<del>training of employees</del> Comunicate to <u>Kathy Ruhaak</u> regarding <u>legal review of a training manual</u> in order to insure compliance with the <u>FDCPA</u> .	<del>Draft of training manual for legal compliance procedures;</del> <del>including</del> Redacted material contains handwritten notes and comments of Victor H. Miller, Esq. which were communicated to the client, and written to insure compliance with federal law.
12	HHS 02232890- HHS 02232938	03/31/2000	Victor H. Miller, Esq. (Legal Department)	<del>N/A</del> <u>Kathy Ruhaak (Learning and Development Instructional Designer)</u>	N/A	Fair Debt Collection Practices Act- (FDCPA)	<del>Education and training of employees</del> Comunicate to <u>Kathy Ruhaak</u> regarding <u>legal review of a training manual</u> in order to insure compliance with the <u>FDCPA</u> .	Attorney-Client privilege; <del>Draft of training manual for legal compliance procedures;</del> <del>including</del> Redacted material contains handwritten notes and comments of Victor H. Miller, Esq. which were communicated to the client, and written to insure compliance with federal law.
13	HHS 02233092- HHS 02233095	02/02/2000	<del>Andrew M. Budish, Esq. (Senior Counsel)</del> <u>Kathy Ruhaak (Learning and Development Instructional Designer)</u>	<del>George Wilson</del> <u>Anne Marie Marks (MD-Consumer Lending Operations B/U Training &amp; Development Manager)</u>	<del>Kathleen K. Curtin, Esq. (General Counsel)</del> N/A	Fair Debt Collection Practices Act- (FDCPA) <u>Changes and Mini Miranda Warnings</u>	<del>Education and training of employees</del> Comunicate to <u>client</u> regarding <u>state law requirements</u> regarding <u>mini-Miranda warnings</u> .	Attorney-Client privilege; <del>Facsimile enclosing draft of training manual re: FDCA, prepared for attorney review, and enclosing draft</del> Redacted material encompassing memos from Andrew Budish, Esq. re: <del>state laws</del> <del>sent to</del> (1) <u>George Wilson</u> and <u>Kathleen Curtin</u> and (2) <u>Bernie D. Wilson</u>



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				To	CC/BCC			
14	HHS 02290819	05/12/1999	Andrew M. Budish, Esq. (Senior Counsel)	Martina Vargas (Policy and Compliance)	N/A	Alabama loan agreements.	Email correspondence requesting and relaying attorney comments to Alabama loan agreements.	<u>(HFC Real Estate Collections), Chris Snyder (Policy and Compliance), Mike Marks (VP - Collections), David Little (MD - Consumer Lending Operations), and Kathy Huston (Unit Manager - Collections) regarding application of state laws i.e. Mini-Miranda Warnings.</u> Attorney-Client privilege; Email between lawyer and client regarding loan language and application of Alabama law.
15	HHS 02291392	05/05/2000	Sandra Iniguez (Manager - Systems Quality Assurance)	Robert P. O'Han (HFC Sales)	Krista M. Eads (Executive Assistant)	Alabama Insurance and loan information.	Email relaying advice of legal department re: draft bulletin board.	<del>Attorney-Client privilege; Redacted material relays legal advice to be incorporated in draft document.</del> Document Has Been Produced.
16	HHS 02291884 - HHS 02291898	04/05/2002	Andrew M. Budish, Esq. (Senior Counsel)	EFS (Electronic Forms Systems), Part of Policy and Compliance, headed by Marian Iverson.	N/A	Loan language agreement forms. In Lending Disclosure s. FMP Pilot Loan Agreement	Attorney comments regarding loan language communication to client of attorney's edits and comments to draft loan documents, based on legal	Attorney-Client privilege; Redacted material <del>contains</del> communicates attorney comments and edits to draft loan language to client, based on legal requirements of state and federal law.

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				To	CC/BCC			
17	HHS 02294030 - HHS 02294031	08/20/1998	Andrew M. Budish, Esq. (Senior Counsel)	Cindy Silver (Policy and Compliance)	N/A	Home Equity Credit Line Revolving Loan Agreement	Redacted material providing attorney sign-off re: loan agreement.	Attorney-Client privilege; Redacted material reflects attorney comments and attorney sign-off re: loan agreement Document Has Been Produced.
18	HHS 02294279	08/20/1998	Andrew M. Budish, Esq. (Senior Counsel)	Cindy Silver (Policy and Compliance)	N/A	Arizona pre-payment penalty.	Email providing attorney sign-off and comments re: pre-payment penalty-section of loan agreement.	Attorney-Client privilege; Email reflects attorney comments and attorney sign-off re: pre-payment penalty-section of loan agreement Document Has Been Produced.
19	HHS 02294333	03/01/1999	Elizabeth De Paula Arias, Esq. (Household Counsel)	Sherry L. Woodson (Policy and Compliance)	William Connolly (Senior Manager - Customer Information Management)	Arizona Consumer Contracts law.	Email correspondence requesting and relaying edits to Arizona loan documents based on application of Arizona law.	Attorney-Client privilege; Email between lawyer and client regarding Arizona Consumer Contracts and application of Arizona law.
20	HHS 02294873 -	01/04/2000	Jim D. Pommier	Elizabeth De Paula Arias, Esq.	Robert P. Norwich (Policy)	Arizona	Email	Attorney-Client privilege;

#	Bates Number	Date	Author/From (Policy and Compliance)	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To (Household Counsel)	CC/BCC and Compliance)			
	HHS 02294874					<p><del>loan issues: Personal Home Loans</del></p>	<p>correspondence re: <del>edit</del> to <del>Arizona loan documents</del> regarding and providing advice re: application of <del>Arizona</del> state and federal law.</p>	
21	HHS 02299144 - HHS 02299145	04/04/2002	Celia Gomez (Consumer Lending)	Katie Moorshead, Esq. (HFC Law Department)	N/A	<p>Arizona loan document for:</p>	<p>Facsimile cover sheet requesting advice and recapping earlier discussion with attorney.</p>	<p>Attorney-Client privilege; Facsimile cover sheet requests advice and recaps earlier discussion between lawyer and client re: loan language Document Has Been Produced.</p>
22	HHS 02299305 - HHS <del>02299307</del> 02299306	04/11/2002	Katie Moorshead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	Isabel Pierr-Isabelle (Assistant Vice President Policy & Compliance Support) N/A	<p>Iowa loan document for: Loan Repayment and Security Agreement</p>	<p>correspondence re: <del>edit</del> to requesting and providing advice, edits and comments to client regarding Iowa loan documents, as per legal requirements.</p>	<p>Attorney-Client privilege; Email correspondence between lawyer and client regarding sign-off on attorney advice, edits and comments to Iowa loan documents as per legal requirements.</p>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
23	HHS 02299315 - HHS <del>02299324</del> 02299318	03/25/2002	Katie Moorshead, Esq. (HFC Law Department)	Adrian L. Bolding (Policy and Compliance Specialist)	Celia Gomez (Consumer Lending)	Iowa <del>loan document</del> <del>Loan Repayment</del> <del>and Security</del> <del>Agreement</del>	<del>Email</del> <del>correspondence</del> <del>re-edits</del> <del>Communications</del> requesting <del>and providing</del> attorney <del>advice, edits</del> and <del>comments</del> to <del>client</del> regarding Iowa loan documents as per legal requirements.	Attorney-Client privilege; <del>Email</del> Redacted material contains email between lawyer and client regarding <del>application of Iowa law, and draft</del> requesting and providing legal advice, edits and comments to Iowa loan <del>agreements, and including</del> documents, and includes comments and approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.
24	HHS 02299325 - HHS 02299332	04/01/2002	Katie Moorshead, Esq. (HFC Law Department)	Celia Gomez (Consumer Lending)	N/A	Iowa <del>loan document</del> <del>Loan Repayment</del> <del>and Security</del> <del>Agreement</del>	<del>Email</del> <del>correspondence</del> <del>Communications</del> requesting <del>and providing</del> attorney <del>advice, edits</del> <del>and</del> <del>comments</del> to <del>client</del> regarding Iowa loan documents, <del>adapted to an</del> <del>edited draft of</del> <del>a loan</del> <del>agreements</del> per legal	Attorney-Client privilege; <del>Email</del> Redacted material contains email between lawyer and client regarding <del>sign-off</del> requesting and providing legal advice, edits and comments to Iowa loan documents, and includes comments and approval from Donna L. Radzik, Esq. (Household Counsel) to Iowa loan document, per legal requirements.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
25	HHS 02300741 - HHS 02300742	09/10/2002	Lidia Lemus (Policy and Compliance) Donna L. Radzik, Esq. (Household Counsel)	Donna L. Radzik, Esq. (Household Counsel) Lidia Lemus (Policy and Compliance) Andrew M. Budish, Esq. (Senior Counsel)	G.D. Rauenbuehler (Manager - Policy & Compliance Support) Jim D. Pommier (Policy and Compliance Support) Daniel J. Doyle (Policy and Compliance) Isabel Pierrri Isabelle (Assistant Vice President - Policy & Compliance Support) Martina Vargas (Policy and Compliance) Cynthia L. Weaver (Policy and Compliance) N/A	Loan language for Contract Rates.	Email correspondence reflecting attorney comments and attorney sign off re: requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan language as per legal requirements.	Attorney-Client privilege; Redacted material contains an email relating attorney comments email correspondence requesting and providing attorneys advice regarding draft loan language as per legal requirements.
26	HHS 02300745- HHS 02300746	09/10/2002	Donna L. Radzik, Esq. (Household Counsel)	Lidia Lemus (Policy and Compliance)	N/A	Loan language for Contract Rates.	Email correspondence reflecting attorney comments re: loan language requesting and providing advice of Donna L. Radzik, Esq. and Andrew M. Budish, Esq. regarding draft loan	Attorney-Client privilege; Redacted material contains email between attorney and clients correspondence requesting and providing advice of attorneys regarding draft loan language as per legal requirements.

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				To	CC/BCC			
27	HHS 02300771 - HHS 02300772	08/15/2002	Andrew M. Budish, Esq. (Senior Counsel)	Sean E. Casey (Assistant Manager – Policy & Compliance Support)	N/A	Illinois Revolving Real Estate and PHL <del>forms</del> - <u>For</u> <u>ms</u>	Email correspondenc e <del>regarding attorney-review and-advise-re: loan-agreement</del> <del>forms</del> <u>Redacted</u> <u>material contains email</u> <u>correspondence requesting and providing advice of attorney regarding draft loan language, as per legal requirements.</u>	Attorney-Client privilege; <del>Email contains attorney review and advise re: loan agreement forms</del> <u>Redacted material contains email correspondence requesting and providing advice of attorney regarding draft loan language, as per legal requirements.</u>
28	HHS 02301553 - HHS 02301554	09/05/1997	Jeff Wood, Esq. (Law Department)	Stephen P. Pickett (Southwestern Unit Manager)	Daniel J. Doyle (Policy and Compliance) <del>David W. Urbane</del> <del>(Policy and Compliance Support)</del>  Tom G. Schneider (Director, Policy and Compliance Support)  Lee Leggette, Esq. (Household Counsel)  Jo Ann Davis, Esq. (Household Counsel)  Kathleen K. Curtin, Esq. (General Counsel)	Househol d loan policies for California Commerci al Properties.	Email correspondenc e requesting and relaying attorney advice <u>to client</u> regarding Household loan policies, <u>as per requirements of California law.</u>	Attorney-Client privilege; Redacted material requests and relays advice from attorney to client regarding Household loan policies, <u>as per requirements of California law.</u>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
29	HHS 02301983	<del>01/13/1998</del>	<del>Nancy J. Bromley, Esq. (Senior Counsel)</del>	<del>Cynthia M. Silver (Policy and Compliance)</del>	Thomas M. Detelich (MD - Consumer Lending)  Dave J. Philipps (Policy and Compliance Support)  John J. Berwanger, Esq. (HFC Law)  Patrick F. Zenzola (Government Relations - California)	<del>Eserow law in California</del>	<del>Email from Nancy J. Bromley, Esq. regarding draft of California Eserow Document Preparation memo.</del>	<del>Attorney-Client privilege; Redacted material-relays legal advice re: draft loan memo Document Has Been Produced.</del>
30	HHS 02302527	<del>04/11/30/26/1998</del> 1997	<del>John J. Berwanger, Esq. (HFC Law)</del> Shehad A. Mohammed (Responsible Lending) M. Brown (Household employee)	<del>Shehad A. Mohammed (Responsible Lending)</del> Cindy M. Brown (Household employee)	N/A	California sales forms.	Email chain containing question to attorney John J. Berwanger, Esq. (HFC Law), and attorney answer, regarding question regarding use of form under California law.	Attorney-Client privilege; Email between lawyer and client regarding interpretation of California law.
31	HHS 02302532	04/30/1998	Nancy J.	Cynthia M. Silver (Policy and	N/A	California	Email	Attorney-Client privilege;

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
			Bromley, Esq. (Senior Counsel)	Compliance)		fair lending law.	containing question to attorney, and attorney answer, <del>regarding question</del> regarding California fair lending law.	Email between lawyer and client regarding application of California Fair Lending law.
32	HHS 02302533	04/17/1998	Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Email containing question to attorney <del>regarding question</del> regarding California fair lending law.	Attorney-Client privilege; Email between lawyer and client regarding application of California Fair Lending law.
33	HHS 02302534 - HHS 02302535	<del>12/02/04</del> 12/1997	Cynthia M. Silver (Policy and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	N/A	California fair lending law.	Facsimile containing email seeking and <del>reley</del> providing legal advice <del>es</del> from Nancy J. Bromley, Esq., John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department) regarding California fair lending law.	Attorney-Client privilege; Communication between <del>lawyer</del> lawyers and client regarding interpretation of California law.



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34	HHS 02302538 - HHS 02302539	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	Kathleen K. Curtin, Esq. (General Counsel)	California fair lending law.	Email correspondence requesting and <del>relaying</del> <del>edit</del> providing legal advice from <u>John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department)</u> regarding California fair lending law.	Attorney-Client privilege; Redacted material contains email between <del>lawyer</del> lawyers and client regarding application of California law.
35	HHS 02302542 - HHS <del>02302544</del> 02302543	12/01/1997	John J. Berwanger, Esq. (HFC Law)	Cindy M. Brown (Household employee)	N/A	California fair lending law.	Facsimile containing email <del>seeking</del> requesting and providing legal advice from <u>John J. Berwanger, Esq. (HFC Law) and Jeff Wood, Esq. (Law Department)</u> on California fair lending law.	Attorney-Client privilege; Redacted material contains a communication between lawyer and client regarding interpretation of California law.
36	HHS 02302595 - <del>HHS-02302596</del>	05/07/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Trustee	Email seeking and providing legal advice from <u>Nancy J.</u>	Attorney-Client privilege; <del>Email</del> Redacted material contains a communication between lawyer and client

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
37	HHS 02302672	04/28/1998	Daniel J. Doyle (Policy and Compliance)	Jon R. Shrum (AVP Quality Assurance and Compliance)	Cindy M. Brown (Household employee) Dave J. Philipps (Policy and Compliance Support)	California <del>loan</del> <del>issue</del> <u>law</u> re: <u>questions concerning race in connection with certain loans</u>	Bromley re: <u>use of trustee on California loans</u> . Email correspondence relating legal advice of Nancy J. Bromley, Esq. (Senior Counsel) and John Berwanger, Esq. (HFC Law), as per question of client regarding California <del>loan</del> <u>issue</u> <u>legal requirements re: race questions</u> .	regarding application of California law re: trustees. Attorney-Client privilege; Redacted material relays communication <del>between</del> <u>from lawyer and</u> <u>client</u> regarding interpretation of California law.
38	HHS 02302674	05/21/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Cynthia M. Silver (Policy and Compliance)	N/A	California Fair Lending Notice.	Email correspondence requesting and relaying advice of Nancy J. Bromley regarding California fair lending notice and requirements of law.	Attorney-Client privilege; Email <del>between lawyer and client</del> <u>correspondence requesting and relaying advice of Nancy J. Bromley</u> regarding <del>interpretation of California law</del> <u>fair lending notice and requirements of law</u> .

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39	HHS 02303071	04/06/1998	Daniel J. Doyle (Policy and Compliance)	Jon J. Shrum (AVP Quality Assurance and Compliance)	Nancy J. Bromley, Esq. (Senior Counsel)	California loan agreement s.	Email requesting <u>advice from Nancy Bromley, Esq. re: appropriate language for loan documents.</u>	Attorney-Client privilege; Redacted material <u>requests contains a request for legal advice re: from Nancy Bromley, Esq. re: appropriate language for loan documents.</u>
40	HHS 02303490- HHS 02303492	11/15/1999	Dave J. Philipps (Policy and Compliance Support)	Jo-Ann Davis, Esq. (Household Counsel)	N/A	Loan Chart Report.	Facsimile requesting and relaying advice from counsel.	Attorney-Client privilege; Facsimile demonstrates request and receipt of legal advice re: loan chart report. Document Has Been Produced.
41	HHS 02303494	11/15/1999	Dave J. Philipps (Policy and Compliance Support)	Jo-Ann Davis, Esq. (Household Counsel)	N/A	Loan Agreements.	Facsimile seeking advice from counsel.	Attorney-Client privilege; Redacted material seeks legal advice re: loan document language. Document Has Been Produced.
42	HHS 02303613 - HHS 02303614	10/07/1998	Kathy Thompson (Legal Secretary to Loren Morris, Esq., Nancy J. Bromley, Esq. (both Household Counsel) and Mary Winslow (Household paralegal))	Bill Connolly (Senior Manager - Customer Information Management)	N/A	Facsimile discussing California lending law.	Facsimile to counsel seeking advice re: new California law.	Attorney-Client privilege; Redacted material contains a facsimile-seeking advice of counsel re: new California law. Document Has Been Produced.
43	HHS 02303791 - HHS 02303792	11/12/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Tracy Hortatos (Policy and Compliance)	N/A	California lending law.	Facsimile containing attorney comments to proposed update re:	Attorney-Client privilege; Facsimile contains attorney comments regarding proposed update re: California lending law. Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
44	HHS 02303852	10/29/1998	Nancy J. Bromley, Esq. (Senior Counsel)	Tracy Hortatso (Policy and Compliance)	Jo Ann Davis, Esq. (Household Counsel)	California lending law.	<p><del>California lending law.</del></p> <p>Email correspondence containing attorney's responses to questions regarding California lending law.</p>	<p><u>Produced.</u></p> <p>Attorney-Client privilege; Email correspondence containing attorney's responses to questions regarding California lending law.</p>
45	HHS 02303912 - HHS 02303914	02/19/1999	Vincent A. Ruiz, Esq. (Gutierrez and Associates)	Martina Vargas (Policy and Compliance)	N/A	California customer survey.	<p><del>Facsimile seeking providing attorney comments and attorney sign off as per request of client re: California customer survey.</del></p>	<p>Attorney-Client privilege; Facsimile contains communication <del>to</del> <u>from</u> attorney <del>requesting</del> <u>providing</u> legal review and sign off for proposed changes to survey.</p>
46	HHS 02303915 - HHS 02303918	02/19/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	<p>Facsimile seeking attorney comments and attorney sign off re: California customer survey.</p>	<p>Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.</p>
47	HHS 02303921 - HHS 02303924	02/11/1999	Martina Vargas (Policy and Compliance)	Vincent A. Ruiz, Esq. (from Gutierrez and Associates)	N/A	California customer survey.	<p>Facsimile seeking attorney comments and attorney sign off re: California customer survey.</p>	<p>Attorney-Client privilege; Facsimile contains communication to attorney requesting legal review and sign off for proposed changes to survey.</p>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
48	HHS 02304525	12/21/1998	Lee Leggette, Esq. (Household Counsel)	Cynthia Weaver (Policy and Compliance)	N/A	Overlimit Fee Language for Check Loan Notes.	Memo from attorney to employee in the Policy and Compliance Department re: change to loan language.	Attorney-Client privilege; Memorandum <del>contains</del> provides legal advice to client regarding overlimit fee language for check note loans.
49	HHS 02305238- HHS 02305239	06/07/1999	Andrew M. Budish, Esq. (Senior Counsel)	<del>EFS (Electronic Forms Systems). Part of John L. Morrisson (Policy and Compliance--headed by Marian Iverson. Support)</del>	N/A	Truth In Lending Application Disclosure	<del>Draft Email</del> seeking and providing advice of attorney regarding draft Truth <del>in</del> Lending Application Disclosure, as per legal requirements, and attaching attorney comments to said documents.	Attorney-Client privilege; Redacted material contains an email exchange between Household Legal Counsel and an employee seeking legal advice, and comments of Andrew M. Budish, Esq. re: <del>draft</del> attorney and client seeking advice regarding legal requirements for Truth in Lending Application Disclosure, and attaching attorney comments to said document.
50	HHS 02306616	12/13/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	N/A	California <del>broker</del> <del>commissi</del> <del>on</del> <del>checks</del> <del>law</del> <del>ie.</del> <del>brokers'</del> <del>commissi</del> <del>ons.</del>	Email between lawyer and Policy and Compliance Department asking questions and conveying approval for a	Attorney-Client privilege; Redacted material contains an email exchange between Household Legal Counsel and an employee seeking legal advice regarding a bulletin board re: broker commission checks.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
51	HHS 02306624	12/13/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	<del>N/A</del> <u>Daniel J. Doyle (Policy and Compliance)</u>	California <del>broker</del> <del>commissi</del> <del>on</del> <del>on</del> <del>cheeks-la</del> <del>w re:</del> <del>brokers'</del> <del>commissi</del> <del>ons</del>	bulletin board. Email from lawyer relating interpretation of California law to Policy and Compliance department.	Attorney-Client privilege; Email from lawyer to client relating interpretation of California law.
52	HHS 02306625 - <del>HHS-02306626</del>	12/01/1999	Nancy J. Bromley, Esq. (Senior Counsel)	Peter B. Barr (Policy and Compliance)	Daniel J. Doyle (Policy and Compliance)	California law re: brokers' commissions.	Email requesting and relaying advice from counsel regarding broker commission check.	Attorney-Client privilege; <del>Email</del> <del>Redacted material</del> contains email between lawyer and client relating interpretation of California law re: broker commission checks.
53	HHS 02307964	<del>07/17/2000</del>	<del>Juliette Sode,</del> (Policy and Compliance)	<del>Nancy J. Bromley, Esq</del> (Senior Counsel)	<del>N/A</del>	<del>California hazard insurance disclosure.</del>	<del>Legal question directed to Nancy Bromley, Esq regarding disclosure issues.</del>	<del>Attorney-Client privilege; Redacted material contains question to counsel and response re: California hazard insurance disclosure Document Has Been Produced.</del>
54	HHS 02308621	<del>11/14/2000</del>	<del>Sharon S. Seodius</del> (Operations Support)	<del>Isabel Pierri-Isabelle</del> (Assistant Vice-President—Policy & Compliance Support) <del>Gary Rauenbuehler</del> (Manager—Policy & Compliance Support) <del>Martina Vargas</del> (Policy and Compliance)	<del>N/A</del>	<del>Document Preparation Fee.</del>	<del>Email relaying advice of counsel regarding changes to fee.</del>	<del>Attorney-Client privilege; Email correspondence reflecting legal advice to household employee regarding document preparation fees Document Has Been Produced.</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
55	HHS 02308924 - HHS 02308925	10/22/2000	<del>Nancy J. Bromley, Esq. (Senior Counsel)</del>	<del>Ferry N. Price (Regulatory Relationship Manager)</del>	<del>N/A</del>	<del>California fair lending practices.</del>	<del>Email requesting and relaying legal advice regarding disclosure issues.</del>	<del>Attorney-Client privilege; Redacted material relays legal advice re: California fair lending practices Document Has Been Produced.</del>
56	HHS 02309462 - HHS-02309463	01/10/2002	Maryann E. Bennett (Unit Manager - Product Compliance)	Joanne Schaffeld (Manager - Policy Forms & Compliance)	Tom G. Sokan (Policy and Compliance Support) <u>Cornie M. Scott (Policy and Compliance Support)</u> <u>Marvann E. Bennett (Unit Manager - Product Compliance)</u>	California insurance.	Email correspondence reflecting relaying legal advice to Jo Ann Davis, Esq. (Household employee Counsel) to client regarding language permitted for use in California insurance document.	Attorney-Client privilege; Redacted material relays legal advice of Jo Ann Davis, Esq. (Household Counsel) to client regarding language permitted for use in California insurance document.
57	HHS 02309527	12/13/2000	Cynthia E. Weaver (Policy and Compliance)	Robin Smith (HFC Policy and Compliance) Jim D. Pommier (Policy and Compliance Support) Daniel J. Doyle (Policy and Compliance)	Martina Vargas (Policy and Compliance) April S. Thorne (Policy and Compliance Support) Isabel Pierrre Isabelle (Assistant Vice President - Policy & Compliance Support) Jill A. Moon (Senior Analyst - Business	Loan payment language.	Email relaying advice of counsel to Household employees re: lending practices.	Attorney-Client privilege; Redacted material relays legal advice re: lending practices Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
58	HHS 02310313	04/06/2001	Nancy J. Bromley, Esq. (Senior Counsel) Dovle (Policy and Compliance)		Systems Sherry L. Woodson (Policy and Compliance) Gary Rauenbuehler (Manager Policy & Compliance Support) Ron J. Stanke (Consumer Lending, Policy and Compliance) Sean E. Casey (Assistant Manager Policy & Compliance Support) Veronica Rodriguez (Senior Process Procedure and System Analyst) N/A	California sales finance contracts.	Email requesting and relaying advice of Nancy J. Bromley regarding California law on refinancing sales finance contracts.	Attorney-Client privilege; Email contains advice of an attorney responding to a question on a specific California rule.
59	HHS 02310481 - HHS 02310482	05/15/2001	Nancy J. Bromley, Esq. (Senior Counsel)		N/A	California Parity Act.	Email correspondence requesting and relaying advice of Nancy Bromley, Esq.	Attorney-Client privilege; Email contains advice of an attorney responding to a question on a specific California rule.



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
60	HHS 02379109 - HHS 02379126	06/4/2002	Katie Moorshead, Esq. (HFC Law Department)	N/A	N/A	Civil Investigati on Demand from the State of Arizona.	( <del>Senior Counsel</del> ) <del>en</del> regarding the California Parity Act. <del>Notes</del> Attorney's notes used in preparing response to Civil Investigation Demand.	Work Product; Redacted material contains handwritten notes of Katie Moorshead, Esq. <del>responding in preparation of response</del> to requests of attorney general, including <del>determination of which Household employee should bear responsibility for gathering materials and answers to each request</del> legal strategies, requests to be clarified and objections to requests.
61	HHS 02379385 - HHS 02379431	07/3/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and Leonard, LLP)	<del>Sandra R. Kane, Esq. (Assistant Attorney General, Arizona) Household Legal Department</del>	N/A	Arizona Civil Investigati on Demand.	<del>Response</del> Draft response to Arizona Attorney General Demand faxed to Household <del>by Household's outside counsel</del> for review.	Work Product and Attorney-Client privilege; Draft letter containing initial response to Civil Investigation Demand, <del>as well as including</del> draft <del>answers</del> responses and objections with handwritten legal comments.
62	HHS 02385615 - HHS 02385616	N/A	N/A	N/A	N/A	Restateme nt of Earnings.	Statements prepared at the request of counsel regarding restatement of	Attorney-Client privilege; <del>Bullet point memo summarizing facts regarding the restatement of earnings, accounting for stock options and the</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
63	HHS 02405727	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation on by HUD re: <u>Arizona</u> <u>complaint</u> §.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	<del>KPMG audit, and stating on its face "Privileged and Confidential: Prepared at the request of counsel."</del> <u>Document Has Been Produced.</u> <u>Work Product and Attorney-Client privilege;</u> Email contains advice of an attorney responding to a question regarding <u>legal strategy concerning the response to a letter received from HUD.</u>
64	HHS 02405728	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation on by HUD re: <u>Arizona</u> <u>complaint</u> §.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	<u>Work Product and Attorney-Client privilege;</u> Email contains advice of an attorney responding to a question regarding <u>legal strategy concerning the response to a letter received from HUD.</u>
65	HHS 02405959	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation on by HUD re: <u>Arizona</u> <u>complaint</u> §.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	<u>Work Product and Attorney-Client privilege;</u> Email contains advice of an attorney responding to a question regarding <u>legal strategy concerning the response to a letter received from HUD.</u>
66	HHS 02405960	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigation on by HUD re: <u>Arizona</u> <u>complaint</u> §.	Email correspondence reflecting advice of Katie Moorshead, Esq. regarding a response to HUD.	<u>Work Product and Attorney-Client privilege;</u> Email contains advice of an attorney responding to a question regarding <u>legal strategy concerning the response to a letter received from HUD.</u>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
67	HHS 02406152	02/11/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaint filed with the Arizona Attorney General's office.	HUD. <del>Response</del> <u>Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.</u>	received from HUD. <u>Work Product and Attorney-Client privilege;</u> Email correspondence reflecting questions from attorney regarding answering a complaint filed with the Arizona attorney general and <u>forwarded to Household Legal Department by branch office for response.</u>
68	HHS 02406344	04/17/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaints filed with the Arizona Attorney General's office.	<del>Response</del> <u>Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.</u>	<u>Work Product and Attorney-Client privilege;</u> Email correspondence reflecting questions from attorney regarding answering complaints filed with the Arizona attorney general and <u>forwarded to Household Legal Department for response.</u>
69	HHS 02406345 - HHS 02406346	04/17/2002	Tom G. Schneider (Director, Policy and Compliance Support)	Katie Moorshead, Esq. (HFC Law Department)		Complaints filed with the Arizona Attorney General's office.	<del>Response</del> <u>Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.</u>	<u>Work Product and Attorney-Client privilege;</u> Email correspondence <del>reflecting answers to attorney questions re:</del> <u>contains questions by Katie Moorshead, Esq. to Jessie D. McClure (Quality Assurance/Compliance Manager) and Ken A. Walker (National Quality Assurance Manager), and responses thereto, obtained for the purpose of</u>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
70	HHS 02406347 - HHS 02406348	05/21/2002	Katie Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Possible Investigations on by HUD re: Arizona Complaints filed with the Arizona Attorney General's office.	Response to complaints filed with the Arizona Attorney General's office. Email corresponding to advice of Katie Moorshead, Esq. regarding a response to HUD.	answering complaints filed with the Arizona attorney general and forwarded to Household Legal Department for response. Work Product and Attorney-Client privilege; Email correspondence reflecting questions from attorney re: complaints filed with the Arizona attorney general contains advice of an attorney responding to a question regarding legal strategy concerning the response to a letter received from HUD.
71	HHS 02406349							Document Has Been Produced.
72	HHS 02406373 - HHS 02406379	04/03/2002	Katie Moorshead, Esq. (HFC Law Department)	Rachel N. Grant (Assistant Sales Manager) Mary B. Johnston (Director, Operations Support) Kenneth T. Scruggs (Director Government Relations (state))	Lisa M. Sodeika (VP - Consumer Affairs) Jada M. Howard (Rapid Response) Kathleen K. Curtin, Esq. (General Counsel)	Complaints filed with the Arizona Attorney General.	Response Email corresponding to response to complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence regarding strategy and attorney analysis of complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response; attaching emails to counsel from Kenneth T. Scruggs and Jada M. Howard summarizing and providing status of

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
73	HHS 02406667 - <u>HHS 02406669</u>	04/03/2002	Katie Moorshead, Esq. (HFC Law Department)	<del>Kathleen K. Curtin, Esq. (General Counsel)</del> <u>Rachel N. Grant (Assistant Sales Manager)</u> <u>Mary B. Johnston (Director Operations Support)</u> <u>Kenneth T. Scruggs (Director Government Relations (state))</u>	Lisa M. Sodeika (VP - Consumer Affairs)  Jada M. Howard (Rapid Response)  <del>Rachel N. Grant (Assistant Sales Manager)</del> <u>Kathleen K. Curtin, Esq. (General Counsel)</u>  <del>Mary B. Johnston (Director Operations Support)</del>  <del>Kenneth T. Scruggs (Director Government Relations (state))</del>	Complaints filed with the Arizona Attorney General.	<del>Response</del> <u>Email correspondence regarding response to complaints filed with the Arizona Attorney General's office.</u>	<u>individual complaints.</u> <u>Work Product and Attorney-Client privilege;</u> Email correspondence <del>requesting</del> <u>contains legal strategy and attorney analysis of complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response.</u>
74	HHS 02406926 - HHS 02406942	06/28/2002	Paula G. McGuire (Paralegal)	<del>Marci M. Geddes Goldfarb, (Director Consumer Affairs)</del>  Rose K. Patenaude (Director - Corporate Licensing)  Ron J. Stanko (Consumer Lending, Policy and Compliance)  April S. Thorne (Policy and Compliance Support)  Ellen E. Kirkham (Assistant Vice President - Financial Analysis)  James J. O'Brien (Director - Credit Policy/Risk)	Katie Moorshead, Esq. (HFC Law Department)  Susan S. Lindsey (Paralegal)	Arizona Attorney General Civil Investigation on Demand.	<del>Response to Email correspondence regarding response to Arizona Civil Investigation Demand.</del>	Work Product and Attorney Client Privilege; Email correspondence <del>requesting and relaying</del> <u>information from individuals identified by Katie Moorshead, Esq. and reply emails relaying information from such individuals, as requested by counsel, to be incorporated in draft responses to Arizona Attorney General Civil Investigation Demand.</u>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
				Steve R. Nesbitt (Vice President – Human Resources) Richard J. Kolb (Director – Sales Support & MIS) Amanda K. Hines (Director – Payroll Operations) Martina Vargas (Policy and Compliance) John W. Blenke (VP Corporate Law and Assistant Secretary) Mary B. Johnston (Director, Operations Support) Thomas M. Detelich (MD - Consumer Lending) Larry H. Zell (Director – Policy & Compliance) Jo Ann Davis, Esq. (Household Counsel) Carla J. Madura (AVP – Policy Compliance Support) Lynne C. Zaremba (Paralegal) Jada M. Howard (Rapid Response)				

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
75	HHS 02406943	07/02/2002	Paula G. McGuire (Paralegal)	Loretta R. Abrams (National Director, Consumer Affairs) Patricia A. Wisniewski (Senior Human Resources Manager) Brad A. Firlle (Senior Human Resources Manager) Susan S. Lindsey (Paralegal)	N/A	Civil Investigation on Demand from the State of Arizona.	<del>Response to Email correspondence regarding response to Arizona Civil Investigation Demand.</del>	<del>Work Product and Attorney-Client privilege; Email correspondence forwarded to paralegals contains advice of by Paula G. McGuire is an email chain containing correspondence between Kathleen K. Curtin, Esq. re: (Household Counsel), Lindy B. Hood (Consumer Lending Policy) and Paula G. McGuire re: data to be included in preparation of draft response to the Arizona Attorney General Investigative Demand.</del>
76	HHS 02406944 - HHS 02406955	N/A	Paula G. McGuire (Paralegal)	N/A	N/A	Civil Investigation on Demand from the State of Arizona.	<del>Document prepared to assist in Response to Civil Investigation Demand of Arizona Attorney General.</del>	<del>Work Product and Attorney-Client privilege; Document summarizing what is sought by attorney general, including determination of which Household employee should bear responsibility for gathering materials and answers to each request Civil Investigation</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
77	HHS 02406999	06/26/2002	Mark F. Leopold, Esq. (Assistant General Counsel)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General and the Illinois Attorney General demands.	Response to Civil Investigation Demand.	<u>Demand of attorney general. Redacted material concerns determination of objections regarding scope of Household's knowledge, and partial draft response.</u> <u>Attorney-Client privilege;</u> <u>Email to Household legal counsel asking question regarding responses to investigations of attorneys general Document Has Been Produced.</u>
78	HHS 02407079- HHS 02407081	08/08/2002	Glen Boudreaux (Attorney, Boudreaux and Leonard, LLP)	Sandra R. Kane (Assistant Attorney General, Arizona Household Legal Department)	N/A	Arizona Attorney General Civil Investigation on Demand.	Response to Civil Investigation Demand Draft response to Arizona Attorney General Demand faxed to Household by Household's outside counsel for review.	Work Product and Attorney-Client privilege; Draft of discovery responses, including handwritten notes, in connection with Arizona letter containing initial response to Civil Investigation Demand, including draft responses and objections with handwritten legal comments.
79	HHS 02407082 - HHS 02407087	07/05/2002	Paula G. McGuire (Paralegal)	Susan Lindsey (Paralegal)	N/A	Arizona Attorney General Civil Investigation Demand.	Response Email correspondence regarding response to Arizona Attorney General Civil Investigation Demand.	Work Product and Attorney-Client privilege; Email chain containing draft responses to the Client Privilege; Email forwards email correspondence requesting



#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
80	HHS 02407088 - HHS 02407090	07/09/2002	Nancy J. Bromley, Esq. (Household Attorney)	Paula G. McGuire (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<u>Investigation Demand.</u>	<u>information from individuals, as requested by counsel, and reply emails relaying information from such individuals to be incorporated in draft responses to Arizona Attorney General Investigative Demand, as requested by counsel, including forwards of earlier emails re: same Civil Investigation Demand.</u>
81	HHS 02407241 - HHS 02407242	07/02/2002	Richard J. Kolb (Household Employee)	Paula G. McGuire (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<u>Response Email correspondence regarding response to Arizona Attorney General Investigation Demand.</u>	Work Product and Attorney-Client privilege; Email from Nancy J. Bromley, Esq. requesting information from employees and forwarding response in connection with Arizona Attorney General investigation
82	HHS 02407435	07/03/2002	Paula G.	Susan Lindsey (Paralegal)	N/A	Arizona	<u>Response Email</u>	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel, replying with information to be incorporated in draft responses to Arizona Attorney General Investigative Civil Investigation Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
83	HHS 02407442	06/05/2002	McGuire (Paralegal)	Katie D. Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response) Mary B. Johnston (Director, Operations Support) Kathleen K. Curtin, Esq. (General Counsel) Paula McGuire (Paralegal)	Arizona Attorney General Investigation Demand.	<u>correspondence regarding</u> Arizona <del>Attorney</del> <u>General Civil Investigation</u> Demand.	Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel, replying with information to be incorporated in draft responses to Arizona Attorney General <del>Investigative Civil</del> <u>Investigation</u> Demand.
84	HHS 02407443	06/05/2002	Shehad A. Mohammed (Responsible Lending)	Katie D. Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response) Mary B. Johnston (Director, Operations Support) Kathleen K. Curtin, Esq. (General Counsel) Paula G. McGuire (Paralegal)	Arizona Attorney Civil Investigation Demand.	<u>Response Email</u> <u>correspondence regarding</u> Arizona <del>Attorney</del> <u>General Civil Investigation</u> Demand.	<u>Work Product and</u> Attorney-Client privilege; Email correspondence between counsel and employees <del>discussing</del> <u>response containing</u> questions of counsel regarding complaints filed in Arizona and response of Household employee for the purpose of responding to Arizona Attorney General Investigative Demand.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
85	HHS 02407445							General Investigative Demand. Document Has Been Produced.
86	HHS 02407446- HHS 02407447	08/12/2002	Angela K. Boyle (Senior Credit/Policy Risk Analyst)	Katie D. Moorshead, Esq. (HFC Law Department)	Elizabeth A. De Paula Arias, Esq. (Household Counsel)	Civil Investigation on Demand from the State of Arizona.	Email correspondence regarding Arizona Attorney General loans.	Work Product and Attorney-Client privilege; Email to counsel containing <del>draft</del> customer information for purposes of drafting responses re: Arizona Attorney General loans.
87	HHS 02407448	08/19/2002	David S. Curcio, Esq. (Attorney, Boudreau and Leonard, LLP)	Katie D. Moorshead, Esq. (HFC Law Department)	N/A	Arizona Civil Investigation on Demand.	Email from outside counsel relaying review and advice re: conciliation agreements with customers in Arizona.	Work Product and Attorney-Client privilege- <del>Outside</del> ; Email correspondence between outside counsel and client containing counsel's review and advice re: <del>agreements, as relayed to in-house counsel via email</del> settlements with customers in Arizona.
88	HHS 02407451 - HHS 02407503	08/06/2002	Glen Boudreaux (Attorney, Boudreaux and Leonard, LLP)	<del>Sandra R. Kane (Assistant Attorney General, Arizona) Household Legal Department</del>	N/A	Arizona Civil Investigation on Demand.	Response Draft response to Arizona Attorney General Demand faxed to Household by Household's outside counsel for review.	Work Product and Attorney-Client privilege; Draft letter containing <del>draft</del> initial response to Civil Investigation Demand, <del>as well as</del> including draft <del>answers</del> responses and objections with handwritten legal comments.
89	HHS 02407504	08/02/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and	Kathleen K. Curtin, Esq. (General Counsel)	Tim S. Leonard, Esq. (Attorney, Boudreaux and Leonard, LLP)	Arizona Fair Housing	Email from outside counsel containing	Work Product and Attorney-Client privilege; Email correspondence

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
			Leonard, LLP)	Elizabeth A. De Paula Arias, Esq. (Household Counsel)	David S. Curcio, Esq. (Attorney, Boudreau and Leonard, LLP)	settlement s.	advice and relaying settlement terms.	between <u>outside</u> counsel and client <del>discussing</del> containing review, advice and summary re: Arizona Fair Housing settlements.
90	HHS 02407505	08/02/2002	Glen Boudreaux, Esq. (Attorney, Boudreaux and Leonard, LLP)	Kathleen K. Curtin, Esq. (General Counsel) Elizabeth A. De Paula Arias, Esq. (Household Counsel)	Tim S. Leonard (Attorney, Boudreaux and Leonard, LLP) David Curcio, Esq. (Attorney, Boudreau and Leonard, LLP)	Arizona Fair Housing settlement s.	Email from outside counsel containing advice and relaying settlement terms.	Work <del>Product</del> Product and Attorney-Client privilege; Email correspondence between <u>outside</u> counsel and client <del>discussing</del> containing review, advice and summary re: Arizona Fair Housing settlements.
91	HHS 02407507- HHS 02407509	07/18/2002	Thomas M. Detelich (MD - Consumer Lending)	Katie D. Moorshead, Esq. (HFC Law Department)	Kathleen K. Curtin, Esq. (General Counsel)	Complaint s filed with the Arizona Attorney General.	<del>Response</del> <u>Response</u> to Email correspondence regarding new complaints filed with the Arizona Attorney General's office.	Work Product and Attorney-Client privilege; Email correspondence, including forwarded emails, <del>regarding</del> containing facts relayed by household employees and attorney analysis of new complaints filed against Household with the Arizona Attorney General and forwarded to Household Legal Department for response.
92	HHS 02407521	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<del>Response</del> <u>Response</u> Email correspondence regarding response to Arizona Attorney General Civil Investigation	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq., <del>forwarded</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
93	HHS 02407523	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<u>Response Email</u> corresponding to response to Arizona <del>Attorney General</del> <u>Investigation</u> Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq., forwarded to paralegals, detailing which documents are to be turned over in response to the), regarding scope of responsive documents to Arizona Attorney General <del>demand</del> <u>Civil Investigation Demand</u> .
94	HHS 02407525	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<u>Response Email</u> corresponding to response to Arizona <del>Attorney General</del> <u>Investigation</u> Demand.	Work Product and Attorney-Client privilege; Email forwarded to paralegal containing email reply of individuals, as requested by counsel (and copying Nancy J. Bromley, Esq., forwarded to paralegals, detailing which documents are to be turned over in response to the), regarding scope of responsive documents to Arizona Attorney General <del>demand</del> <u>Civil Investigation Demand</u> .

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
95	HHS 02407533- HHS 02407534	07/02/2002	Connie M. Scott ( <del>Household</del> <u>employee Policy and Compliance Support</u> )	Joanne M. Schaffeld (Manager - Policy Forms & Compliance) Ron L. Bryar (Group Director - Sales) Tim J. Titus (CFO/Director - Financial Control) Gerard J. Lunemann (Actuarial Director) Jo Ann Davis, Esq. (Household Counsel)	Maryann E. Bennett (Unit Manager - Product Compliance) Nancy J. Bromley, Esq. (Senior Counsel) Tom G. Schneider (Director, Policy and Compliance Support) April S. Thorne (Policy and Compliance Support)	Civil Investigation Demand from the State of Arizona.	<del>Response to Email sent to obtain assistance in Responding to Civil Investigation Demand of Arizona Attorney General Demand.</del> Work Product and Attorney-Client privilege; <del>Email detailing provision of written responses to Arizona Attorney General's Civil Investigative Demand Document summarizing Civil Investigation Demand of attorney general, adding internal determination of objections to requests, which Household employees should bear responsibility for gathering materials and which employees should assist in drafting answers to each request.</del>	Arizona Attorney General <del>demand</del> <u>Civil Investigation Demand.</u>
96	HHS 02408188 - HHS 02408190	07/03/2002	Paula G. McGuire (Paralegal)	Susan S. Lindsey (Paralegal)	N/A	Arizona Attorney General Investigative Demand.	<del>Response Email correspondence regarding response to Arizona Attorney General Civil Investigation Demand.</del> Work Product and Attorney-Client privilege; <del>Email chain originally copying Katie Moershead, Esq., and forwarded to paralegals, Client Privilege, Email forwards email correspondence requesting information from individuals, as requested by counsel, and reply emails relaying information to be turned over in response to request.</del>	Arizona Attorney General <del>demand</del> <u>Civil Investigation Demand.</u>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
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97	HHS 02408662	02/08/2002	Katie D. Moorshead, Esq. (HFC Law Department)	Jada M. Howard (Rapid Response)	N/A	Complaint filed with the Arizona Attorney General's office.	Response to <del>complaint</del> <u>email</u> regarding <u>response to complaints</u> filed with the Arizona Attorney General's office.	<del>the</del> <u>from such individuals to be incorporated in draft responses to Arizona Attorney General <del>demanded</del> Civil Investigation Demand.</u> Work Product and Attorney-Client privilege; Email <del>from counsel to employee re: response to allegations in complaint filed against Household</del> <u>correspondence reflecting questions from attorney regarding answering a complaint filed with the Arizona attorney general and forwarded to Household Legal Department by branch office for response.</u>
98	HHS 02408832 - HHS 02408834	07/29/2002	Angela Miracle (Senior Legal Secretary)	Chris C. Snyder (Director for Mortgage Services Wholesale P&C Support; Household Attorney)	Jeffery S. Bransford (Wholesale Mortgage Processor)  Douglas A. Friedrich (Managing Director-Specialty finance)  Sarah M. Harris (Wholesale Collections)  Margo J. Hickman (Corporate Risk Management)  Loren J. Morris (HMS)	<i>Ciccarelli v. Household Mortgage Services, Residenita I Money Centers, Inc. and Gettysburg Funding, Inc.</i>	Email attaching summary and analysis with respect to pending litigation.	Work Product and Attorney-Client Privilege; summary of a pending litigation prepared by an attorney.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
99	HHS 02408835	04/11/2002	Jean S. Raisbeck (Policy and Compliance)	Keith A. Clardy (HFC-Training and Communications)	Business Development John J. O'Brien (Consultant – Business Systems) Sean A. Rockway (Policy and Compliance) Chris K. Worwa (Controllers Group) Winslow Thomas S. (HMS Business Development) John W. Blenke (Corporate Legal Department) Gregory A. Gibson (Wholesale Operations) Elaine H. Markell (Wholesale Default Services) Ashraf R. Ibrahim (Mortgage Services REO) Andrew M. Budish, Esq. (Senior Counsel)	Price Options- <u>Training</u>	Email <del>correspondence</del> <del>e-reflecting attorney change-of training materials</del> <u>Com</u> <u>communicate to clients</u> <u>regarding necessary requirements for</u> <u>employees to follow when</u> <u>regarding price</u>	Attorney-Client privilege; Email <del>reflects discussing</del> <del>with reflecting legal advice</del> of Andrew M. Budish, Esq. <del>(copied on email)</del> <u>regarding the change to pricing options, as communicated to clients, requirements for employees to follow when</u>



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100	HHS 02408836	04/11/2002	Keith A. Clardy (HFC-Training and Communications)	Andrew M. Budish, Esq. (Senior Counsel)	Jean S. Raisbeck (Policy and Compliance) Regina A. Nowlan (Training and Communications)	Price Options	Question to counsel re: Price-Options	Attorney-Client privilege; redacted material reflects communications with attorney re: seeking attorney approval re: price options form Document Has Been Produced.
101	HHS 02408837	04/09/2002	Keith A. Clardy (HFC-Training and Communications)	Andrew M. Budish, Esq. (Senior Counsel)	Jean S. Raisbeck (Policy and Compliance)	Price Options	Email correspondence re: requesting and relaying advice of counsel re: price options form.	Attorney-Client privilege; Email correspondence reflecting communications with attorney re: attorney approval of price options form Document Has Been Produced.
102	HHS 02408838- HHS 02408840	03/29/2002	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)	N/A	Price Options Training Materials.	Communications with attorney discussing approval of price options form and training materials-Communicate to recipients legal advice regarding price options	Attorney-Client privilege; Email correspondence reflecting attorney approval of training materials; Email reflecting questions to and legal advice of Andrew M. Budish, Esq. regarding necessary requirements for employees to follow when discussing discount points.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
				To	CC/BCC			
103	HHS 02408842 - HHS 02408843	03/28/2002	Andrew M. Budish, Esq. (Senior Counsel)	Keith A. Clardy (HFC-Training and Communications)	N/A	Price Options form and Training Materials.	training, including discussion of when the idea of discount points should be raised. <del>Communicatio</del> ns with attorney discussing approval of price options form and training materials. Com municate to recipients legal advice regarding price options training, including discussion of when the idea of discount points should be raised.	Attorney-Client privilege; <del>Email correspondence reflecting attorney approval of training materials; Email reflecting questions to and legal advice of Andrew M. Budish, Esq., regarding necessary requirements for employees to follow when discussing discount points.</del>
104	HHS 02408847 - HHS 02408848	N/A	<del>Regina A. Nowlan (Training and Communications)</del>	N/A	N/A	Training and marketing forms.	Household employee's handwritten notes reflecting legal questions to be asked of Lee-Leggette, Esq. (Household)	Attorney-Client privilege; Notes reflecting legal advice to be sought of Lee Leggette, Esq. (Household Counsel) and possibly of others re: training and marketing documents. Document Has Been Produced.

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
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105	HHS 02408849 - HHS 02408855	04/06/1999	Regina A. Nowlan (Training and Communications)	Kathleen K. Curtin, Esq. (General Counsel)	N/A	Advanced Sales Training Legal Review.	Memo forwarding training materials as per request of counsel.	Attorney-Client privilege; Memo forwarding training information <del>as per request of counsel</del> for legal review, including handwritten notes regarding a conversation with counsel.
106	HHS 02408856	05/28/2001	Bernie D. Wilson (HFC Real Estate Collections)	Thais M. McClain (Training and Development Department Manager)	Chris A. Snyder (Vice President in Collections - Consumer Lending)	Fair Debt Collection Practices Act.	Email relaying advice of counsel re: <u>FDCPA</u> compliance.	Attorney-Client privilege; Redacted material <del>reflects</del> forwards email containing legal advice of Andrew Budish, Esq. (Senior Counsel) re: compliance with Fair Debt Collection Practices Act.
107	HHS 02408867 - HHS 02408868	02/2/2000	Michael Mulconrey (National Training Manager)	Anne Marie Marks (B/U Training & Development Manager)	N/A	Mini-Miranda warnings.	<del>Education and training of employees</del> ; <u>Com</u> <u>communicate to client</u> <u>regarding state law requirements regarding mini-Miranda warnings.</u>	Attorney-Client privilege; Facsimile enclosing <del>memo</del> <del>and</del> <u>memorandum</u> from Andrew Budish, Esq. (Senior Counsel) to George Wilson (MD-Consumer Lending Operations) <del>re: mini</del> <u>regarding application of state laws re: Mini-Miranda warning under state laws</u> <u>Warnings.</u> Memo follows up on an earlier discussion on mini-Miranda warnings.
108	HHS 02408869 - HHS 02408871	11/1/1999	Andrew M. Budish, Esq. (Senior Counsel)	Bernie Wilson (HFC Real Estate Collections)  Chris Snyder (Vice President in Collections - Consumer Lending)	N/A	Mini-Miranda warnings.	<del>Education and training of employees</del> ; <u>Com</u> <u>communicate to client</u> <u>regarding state</u>	Attorney-Client privilege; Redacted material contains a memo providing analysis <del>of</del> <u>regarding application of state laws re: Mini-Miranda warnings</u> ; <del>in</del>

#	Bates Number	Date	Author/From	Recipient(s)		Subject Matter	Purpose for Its Production	Explanation of Privilege
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109	HHS 02408875	01/31/2000	Andrew M. Budish, Esq. (Senior Counsel)	Mike Marks (VP - Collections) David Little (MD - Consumer Lending Operations) Kathy Huston (Unit Manager - Collections) George Wilson (MD - Consumer Lending Operations)	N/A	Mini-Miranda warnings.	<u>law requirements regarding mini-Miranda warnings.</u>	<del>several states</del> <u>Warnings</u> , including attorney's recommendations.
110	HHS 02408876 - HHS 02408878	11/1/1999	Andrew M. Budish, Esq. (Senior Counsel)	Bernie Wilson (HFC Real Estate Collections) Chris Snyder (Vice President in Collections - Consumer Lending) Mike Marks (VP - Collections) David Little (MD - Consumer Lending Operations)	N/A	Mini-Miranda warnings.	<del>Education and training of employees</del> <u>Communicate to client regarding state law requirements regarding mini-Miranda warnings.</u>	Attorney-Client privilege; <del>Memoranda</del> <u>Memorandum</u> from Andrew Budish, Esq. (Senior Counsel <del>to employee re: mini-Miranda warning under state laws, following</del> ) to George Wilson (MD - Consumer Lending Operations) regarding application of state laws re: Mini-Miranda Warnings. Memo follows <u>up on an earlier discussion on mini-Miranda warnings.</u>
						Mini-Miranda warnings.	<del>Education and training of employees</del> <u>Communicate to client regarding state law requirements regarding mini-Miranda warnings.</u>	Attorney-Client privilege; Memoranda from Senior Counsel to employees <del>re: mini-Miranda warning under state laws</del> regarding application of state laws re: Mini-Miranda Warnings, including attorney's recommendations.

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111	HHS 02408880 - HHS 02408887	07/22/2002	Andrew M. Budish, Esq. (Senior Counsel)	Kathy Huston (Unit Manager - Collections) Mike J. Mulcomrey (National Training Manager)	N/A	U.S. Fair Debt Collection Practices Act.	<del>Education and training of employees-Co</del> <u>communicate to Policy and Compliance Department regarding legal review of a training manual concerning compliance with the FDCA.</u> Attorney-Client privilege; <del>Facsimile-relaying-staff</del> <del>containing the changes</del> <u>Redacted material contains handwritten notes and comments of Andrew M. Budish to a section of a training manual made to ensure compliance with federal law.</u>	
112	HHS 02408888 - HHS 02408894	5/20/2002	Kathleen K. Curtin, Esq. (General Counsel) Lorraine Bieber (Regional Director - Underwriting) M.A. Dougherty (Approving Executive Sponsor)	<del>N/A</del> <u>M.A. Dougherty (Approving Executive Sponsor)</u> <u>Ken Cashmer (Regional Director - Quality Control)</u>	N/A	Title and Appraisal work; Collateral guidelines	<del>Education and training of employees-Co</del> <u>communicate to Policy and Compliance Department regarding legal review of a training manual concerning compliance with the FDCA.</u> Attorney-Client privilege; Draft training manual contains changes of Kathleen K. Curtin, Esq., M.A. Dougherty and Lorraine Bieber, as determined during a meeting between the three.	

Document comparison done by DeltaView on Friday, June 24, 2005 12:28:53 PM

<b>Input:</b>	
Document 1	pcdocs://cgrny1/702295/1
Document 2	pcdocs://cgrny1/711226/2
Rendering set	Standard

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

<b>Statistics:</b>	
	Count
Insertions	388
Deletions	430
Moved from	1
Moved to	1
Style change	0
Format changed	0
Total changes	820

**Exhibit D through O  
Filed Under Seal**

DECLARATION OF SERVICE BY UPS OVERNIGHT 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 LUKE O. BROOKS IN SUPPORT OF LEAD PLAINTIFFS' REPLY IN SUPPORT OF MOTION TO COMPEL THE HOUSEHOLD DEFENDANTS TO PRODUCE DOCUMENTS IMPROPERLY WITHHELD ON THE BASIS OF PRIVILEGE** 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/

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MARCY MEDEIROS



HOUSEHOLD INTERNATIONAL (LEAD)

Service List - 7/21/2005 (02-0377)

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HOUSEHOLD INTERNATIONAL (LEAD)

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