Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 1 of 22 PageID #:6313

Exhibit 1

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 2 of 22 PageID #:6314

Minute Order Form (06/97)

United States District Court, Northern District of Illinois

Name of Assigned Judge or Magistrate Judge			Ronald A.	Guzman	Sitting Judge if Other than Assigned Judge	Nan R. I	Nolan			
CASE NUMBER			02 C :	5893	DATE	6/22/2	004			
CASE TITLE			Lawre	wrence E. Jaffe Pension Plan vs. Household InterNatl, Inc., et al						
мот	ION:		[In the following box (a) is of the motion being present		e motion, e.g., plaintiff, defer	ndant, 3rd party plaintiff, and (b) state briefly the nature			
	KET ENTR'									
(1)			notion of [use listing		love.j					
(2)		1								
(3)										
(4)		•								
(5)		Status hearing[held/continued to] [set for/re-set for] on set for at								
(6)	<u> </u>	Pretrial conference[held/continued to] [set for/re-set for] on set for at								
(7)		Trial[set for/re-set for] on at								
(8)		[Bench/Jury trial] [Hearing] held/continued to at								
(9)		This case is dismissed [with/without] prejudice and without costs[by/agreement/pursuant to] FRCP4(m) Local Rule 41.1 FRCP41(a)(1) FRCP41(a)(2).								
(10)	- D. C. Janes Martin for Extension of Time to File their Answers to the									
(11)	#	[For fi	urther detail see order	attached to the orig	inal minute order.]					
	No notices req	uired, a	dvised in open court.				Document Number			
	No notices req					number of notices				
	Notices mailed					described 2000				
	Docketing to r					date dockeled				
\vdash	Mail AO 450					docketing deputy initials				
	Copy to judge	/magist	rate judge.			6/23/2004				
			courtroom			date mailed notice	1			
SRB			deputy's mitials		ne received in Clerk's Office	mailing deputy initials	· · · · · · · · · · · · · · · · · · ·			

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

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

INTERIM STIPULATION AND ORDER GOVERNING THE CONFIDENTIAL TREATMENT OF DISCOVERY MATERIAL

WHEREAS, the parties hereto are negotiating the terms of a proposed order governing the confidential treatment of certain material exchanged by the parties during discovery (the "Confidentiality Order"); and

WHEREAS, pending the entry of the Confidentiality Order by the Court, the parties wish to begin exchanging documents and other materials (the "Discovery Material") in connection with the discovery process;

NOW, THEREFORE, UPON THE CONSENT OF THE PARTIES, IT IS

HEREBY ORDERED THAT the following principles and procedures shall govern discovery

among the parties pending the Court's entry of the Confidentiality Order:

1. All Discovery Material will be deemed confidential and may be disclosed

NY2:#4596434

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 4 of 22 PageID #:6316

only to counsel to the parties in the litigation, including in-house counsel, and to their employees and contractors (including contract lawyers and litigation support firms) retained by counsel to the parties, who are involved with the preparation for and proceedings concerning, this action or any appeal herein. Any such employee or contractor to whom Discovery Material is made available shall be advised of, and become subject to, the provisions of this Interim Order.

- 2. Discovery Material may be used for purposes of this action only.
- 3. To the extent a party producing Discovery Material may be subject to the Gramm-Leach-Bliley Act, 15 U.S.C. § 6801, et seq., or the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq., (e.g., financial and personal information of Household customers), or any applicable state privacy provisions, such Discovery Material shall be deemed confidential and subject to the protections of this Order. Production of such Discovery Material in this litigation shall not be deemed to be a violation of either the Gramm-Leach-Bliley Act or the Fair Credit Reporting Act or any applicable state privacy provisions.
- 4. This Interim Order shall remain in effect until the Court enters the Confidentiality Order, which latter order shall control Discovery Material produced in this litigation, including that Discovery Material produced pursuant to the Interim Order. The parties agree to attempt to submit a joint proposed Confidentiality Order promptly.

APPROVED AND HEREBY ORDERED THIS 12 day of 2004.

Honorable Nan R. Nolan, U.S.M.J.

Lead Plaintiffs

By: Upa Muhah One of their Attorneys

Patrick J. Coughlin
Azra Z. Mehdi
Luke O. Brooks
LERACH COUGHLIN STOIA
& ROBBINS LLP
100 Pine Street, Suite 2600
San Francisco, CA 94111
Tel: (415) 288-4545
Fax: (415) 288-4534

William S. Lerach
LERACH COUGHLIN STOIA
& ROBBINS LLP
401 B Street, Suite 1700
San Diego, CA 92101
Tel: (619) 231-1058
Fax: (619) 213-7423

Marvin A. Miller
Jennifer Winter Sprengel
Lori A. Fanning
MILLER FAUCHER AND
CAFFERTY LLP
30 North LaSalle Street, Suite 3200
Chicago, IL 60062

Tel: (312) 782-4800 Fax: (312) 782-4485 Defendants Household International, Inc. Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmerand J.A. Vozar

> Nathan P. Eimer Adam B. Deutsch EIMER STAHL KLEVORN & SOLBERG LLP 224 South Michigan Avenue, Suite 1100 Chicago, IL 60605

One of their Attorneys

David R. Gelfand
Michael L. Hirschfeld
Douglas W. Henkin
MILBANK, TWEED, HADLEY
& McCLOY LLP
1 Chase Manhattan Plaza
New York, NY 10005
Tel: (212) 530-5000

Tel: (312) 660-7600

Fax: (312) 692-1718

Defendant Arthur Andersen LLP

Fax: (212) 530-5219

By: One of their Attorneys

Stanley Parzen
Lucia Nale
MAYER, BROWN, ROWE & MAW LLP
190 South LaSalle Street
Chicago, IL 60603
Tel: (312) 782-0600

Fax: (312) 701-7711

NY2:# 4596434

By:

Lead Plaintiffs

Defendants Household International, Inc. Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar

By: One of their Attorneys

Patrick J. Coughlin Azra Z. Mehdi Luke O. Brooks LERACH COUGHLIN STOLA & ROBBINS LLP 100 Pine Street, Suite 2600 San Francisco, CA 94111 Tel: (415) 288-4545 Fax: (415) 288-4534

William S. Lerach LERACH COUGHLIN STOLA & ROBBINS LLP 401 B Street, Suite 1700 San Diego, CA 92101 Tel: (619) 231-1058 Fax: (619) 213-7423

Marvin A. Miller Jenniser Winter Sprengel Lori A. Fanning MILLER FAUCHER AND CAFFERTY LLP 30 North LaSalle Street, Suite 3200 Chicago, IL 60062

Tel: (312) 782-4800 Fax: (312) 782-4485 One of their Attorneys

Nathan P. Eimer Adam B. Deutsch EIMER STAHL KLEVORN & SOLBERG LLP 224 South Michigan Avenue, Suite 1100 Chicago, IL 60605 Tel: (312) 660-7600 Fax: (312) 692-1718

David R. Gelfand Michael L. Hirschfeld Douglas W. Henkin MILBANK, TWEED, HADLEY & McCLOY LLP l Chase Manhattan Plaza

New York, NY 10005 Tel: (212) 530-5000 Fax: (212) 530-5219

Defendant Auffur Andersen LLP

Stanley Parzen Lucia Nale MAYER, BROWN, ROWE & MAW LLP 190 South LaSalle Street Chicago, IL 60603 Tel: (312) 782-0600

Fax: (312) 701-7711

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 7 of 22 PageID #:6319

Exhibit 2



SAN DIRGO - SAN FRANCISCO LOS ANGELES - NEW YORK - BUCA RATON WASHINGTON, DC - HOUSTON PHILADELPHIA - SFATTLE

FACSIMILE

			Fax	No.	<u>Telephone No.</u>		
[Ol	Landis Best, Esq. Cahill Gordon & Reindel LLP		212/269-5420		212/701-3000		
cc:	Marvir	A. Miller, Esq.	312-782-4485		312-782-4880		
Adam		Faucher And Cafferty LLP B. Deutsch, Esq. Stahl Klevorn & Solberg LLP	312-692-1718		312-660-7600		
From	-	Azra Z. Mehdi		Date:	June 22, 2005		
Case	Code:	020377-00001					
Subject:		Lawrence E. Jaffe Pension Plan v. Household International, Inc., et al. Case No. 02-CIV-5893 (N.D. III.)					
		operator at 415/288-4545					



SAN DIBOU - SAN PKANCILCO JOS ANGELES - NEW YORK - BOCA BATON WASHINGTON, DC - HOUSTON PHILADELPHIA - SEATTLE

Azra Z. Mehdi azram@lerachlaw.com

June 22, 2005

VIA FACSIMILE

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

Re:

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

Case No. 02-CIV-5893 (N.D. III.)

Landis:

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

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

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

- In the Erisa litigation, Household was ordered to produce an index of the documents produced to the SEC and any document index provided to the state regulators. See Declaration of Luke O. Brooks in Support of Lead Plaintiffs' Motion to Compel the Household Defendants to Produce Source Logs for Documents Produced in This Litigation, Exhibit 1. The June 17, 2005 log simply lists numerous entries as documents produced to the SEC or in the Erisa litigation rather than providing plaintiffs here with the pre-existing index produced to the Erisa plaintiffs.
- Documents HHS 02129843-02130016 and HHS 03062400-03062429 are listed as "Publicly Available Documents received from Milbank Tweed." Yet, both sets of documents are marked "Confidential." HHS 02129843-02130016 appear to be Vision-related documents. The Household Defendants have taken a hard-line position relating to the confidentiality of Vision documents which is inconsistent with the designation of these documents as "publicly



Landis Best, Esq. June 22, 2005 Page 2

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

- 3. You list multiple sources for the following documents:
 - (a) HHS 02429447-02429456 and HHS 02764359-02765291 The log indicates the source to be both Household Legal Department and Outside Counsel;
 - (b) HHS 03050081-03055080 The log indicates the source to be Credit Card Services Executive Management Administration, Including Margaret Sprude; and
 - (c) HHS 0372256 03073205 The log indicates the source to be Auto Financial Planning, including Joan Coppenrath.

Please designate more precisely the source of these documents.

- 4. Is there a department called "Consumer Lending Training"? If yes, is that the complete name of the department?
- 5. Finally, the log lists 64 individual custodians. Yet during the May 20, 2005 meet and confer, you represented that you had searched the files of over 110 individuals. Further, during the June 14, 2005 meet and confer, you stated that you searched the files of over 120 individuals. Yet, you only list 64 custodians in the June 17, 2005 chart. Please explain this discrepancy.

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

Very truly yours,

Shua Phihoh-Azra/Z. Mehdi

AZM:mog

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

T:\casesSF\household Inti\corres\Best_062205.doc

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 11 of 22 PageID #:6323

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 12 of 22 PageID #:6324

CAHILL GORDON & REINDEL LLP EIGHTY PINE STREET New York, N.Y. 10005-1702

LOYD ABRAMS HOWARD ADAMS OBERT A. ALESSI OGER ANDRUS ELENE R. BANKS IICHAEL A. BECKER ANDIS C. BEST ARY A. BROOKS USAN BUCKLEY EVIN J. BURKE AMES J. CLARK ENJAMIN J. COHEN HRISTOPHER T. COX 1. LESLIE DUFFY DAM M. DWORKIN ICHARD E. FARLEY ATRICIA FARREN OAN MURTAGH FRANKEL ART FRIEDMAN IRO A. GAMBONI ILLIAM B. GANNETT HARLES A. GILMAN

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

TELEPHONE: (212) 701-3000 FACSIMILE: (212) 269-5420

1990 K STREET, N.W. WASHINGTON, D.C. 20006-1181 (202) 862-8900 FAX: (202) 862-8958

AUGUSTINE HOUSE 6A AUSTIN FRIARS LONDON, ENGLAND EC2N 2HA (011) 44.20.7920.9800 FAX: (011) 44.20.7920.9825

WRITER'S DIRECT NUMBER

(212) 701-3955

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

SENIOR COUNSEL

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

COUNSEL

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

June 30, 2005

Re:

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

Dear Azra:

I write in response to your June 22 letter to Landis Best regarding the Household Defendants' production log.

With regard to each of the questions you raised concerning the production log, the Household Defendants respond as follows:

- 1. Enclosed herewith is a document bearing production numbers HHE 01999907-19, which was provided to us by Milbank Tweed as being the index produced in the Erisa litigation.
- 2. With regard to the documents bearing production numbers HHS 02129843-02130016, those documents that do not contain handwriting or other markings were inadvertently stamped "Confidential." We are sending replacement copies to you today.

With regard to the documents bearing production numbers HHS 03062400-29, the "Confidential" stamps were not applied in connection with the Household Defendants' document production in this matter, but rather were previously applied to those documents and produced as they were received.

3a. Documents bearing production numbers HHS 02429447-56 and HHS 02764359-5291 consist of correspondence with the SEC, some of which was collected from Household's Legal Department, and some of which was collected from outside counsel.

- 3b. With regard to the documents bearing production numbers HHS 03050081-5080 the enclosed revised production log indicates that they were collected from Credit Card Services (of which Margaret Sprude is a member).¹
- 3c. With regard to documents bearing production numbers HHS 03072256-3205,² the enclosed revised production log indicates that they were collected from Auto Finance (of which Joan Coppenrath is a member).
- 4. With regard to the entries previously designated "Consumer Lending Training", the enclosed revised production log indicates that they were collected from Human Resources.
- 5. The Household Defendants conducted interviews individually and in groups by department, as indicated in the production log. Additionally, documents collected from some individuals who were interviewed were not responsive to plaintiffs' requests.

Further, as we have informed you on more than one occasion, the Household Defendants do intend to inform plaintiffs of the "sources" of documents going forward, and in fact have already done so. See Craig Kesch's letter to you dated June 23, 2005. Let me know if you have any additional questions or issues relating to the production log.

Sincerely,

David Owen

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

VIA FACSIMILE

[Enclosures]

The Household Defendants' revised production log also reflects that documents bearing production numbers HHS 02132319 - 2169452, HHS 02170476 - 3578 and HHS 02408832 - 34 were produced in the Erisa litigation.

Referred to in your letter as HHS 03772256 - HHS 03073205.

CAHILL GORDON & REINDEL LLP

-3-

cc: Adam Deutsch, Esq. (via facsimile)
Marvin A. Miller, Esq. (via facsimile)
Thomas J. Kavaler, Esq. (w/o enclosures)
Peter Sloane, Esq. (w/o enclosures)
Landis C. Best, Esq. (w/o enclosures)

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 16 of 22 PageID #:6328

CAHILL GORDON & REINDEL LLP

EIGHTY PINE STREET
NEW YORK, N.Y. 10005-1702

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

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

TELEPHONE: (212) 701-3000 FACSIMILE: (212) 269-5420

1990 K STREET, N.W. WASHINGTON, D.C. 20006-1181 (202) 862-8900 FAX: (202) 862-8958

AUGUSTINE HOUSE 6A AUSTIN FRIARS LONDON, ENGLAND EC2N 2HA (O11) 44.20.7920.9800 FAX: (O11) 44.20.7920.9825

WRITER'S DIRECT NUMBER

(212) 701-3692

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

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

GARY W. WOLF

COUNSEL

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

June 30, 2005

Re:

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

Dear Azra:

Pursuant to David Owen's letter to you of today, enclosed please find replacement copies of documents bearing production numbers HHS 02129854 - 02129865, HHS 02129883 - 02129911, HHS 02129937 - 02129940, HHS 02129944 - 02129951, HHS 02129955 - 02129959, HHS 02129966 - 02129967, HHS 02129978 - 02129987, HHS 02129991 - 02130000, HHS 02130006 - 02130008, and HHS 02130012 - 02130016.

Sincerely,

Craig S. Kesch

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

VIA FEDERAL EXPRESS

[Enclosures]

r Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 17 of 22 PageID #:6329

CAHILL GORDON & REINDEL LLP

-2-

cc: Adam Deutsch, Esq. (via facsimile / w/o enclosures)
Marvin A. Miller, Esq. (via facsimile / w/o enclosures)
Stanley Parzen, Esq. (via facsimile / w/o enclosures)
Thomas J. Kavaler, Esq. (w/o enclosures)
Peter Sloane, Esq. (w/o enclosures)
Landis C. Best, Esq. (w/o enclosures)

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 18 of 22 PageID #:6330

Exhibit 3

MILBANK, TWEED, HADLEY & MCCLOY LLP

1 CHASE MANHATTAN PLAZA

LOS ANGELES 813-892-4000 FAX: 213-629-8063

PALO ALTO 650-739-7000 FAX: 650-739-7100

WASHINGTON, D.C. 202-835-7500 FAX: 202-835-7586

LONDON 44-207-448-3000 FAX: 44-207-448-3029 NEW YORK, N.Y. 10005-1418

212-530-5000

FAX: 212-530-5219

Stacey J. Rappaport
Associate
DIRECT DIAL NUMBER
212-530-5347
Fax: 212-822-5347
E-MAIL: srappaport@milbank.com

June 23, 2004

FRANKFURT 49-69-7593-7170 FAX: 49-69-7593-8303

TORYO 813-3504-1050 FAX: 813-3595-2790

HONG KONG 852-2971-4888 FAX: 852-2840-0792

SINGAPORE 65-6426-2400 FAX: 65-6426-2500

VIA E-MAIL

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

Re:

Jaffe v. Household International, Inc. et al.

Dear Azra:

In response to Plaintiffs' First Request for Production of Documents to Household Defendants, a hard drive containing documents bates-stamped HHS 00000001 – HHS 01850180 is available for plaintiffs to pick up today at the offices of Eimer Stahl.

Very truly yours

Stacey J. Rapbapor

Copies to:

Adam Deutsch, Esq. Marvin Miller, Esq. Lucia Nale, Esq. Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 20 of 22 PageID #:6332

Exhibit 4

Case: 1:02-cv-05893 Document #: 312 Filed: 10/12/05 Page 21 of 22 PageID #:6333

Cahill Gordon & Reindel Llp Eighty Pine Street New York, N.Y. 10005-1702

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

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

TELEPHONE: (212) 701-3000 FACSIMILE: (212) 269-5420

1990 K STREET, N.W. WASHINGTON, D.C. 20006-1181 (202) 862-8900 FAX: (202) 862-8958

AUGUSTINE HOUSE GA AUSTIN FRIARS LONDON, ENGLAND EC2N 2HA (O11) 44.20.7920.9800 FAX: (O11) 44.20.7920.9825

WRITER'S DIRECT NUMBER

(212) 701-3692

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

SENIOR COUNSEL
WALTER C. CLIFF
DAVID R. HYDE
WILLIAM T. LIFLAND
IRWIN SCHNEIDERMA
JOHN R. VAUGHAN
GARY W. WOLF

COUNSEL

CORYDON 8. DUNHA! JASON W. KAPLAN RAND McQUINN*

> *ADMITTED IN DC, TX, VA ONLY

October 11, 2005

Re:

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

Dear Azra:

Enclosed please find replacement copies of documents bearing production numbers HHS 00109796-99, HHS 00120130, HHS 01311153-54, HHS 013111155-64, HHS 01311117-27, HHS 01277693-94, HHS 00121399-401, HHS 00119735-37, HHS 01243050-52, HHS 01311128-38, HHS 01263696-701, HHS 01340675-76, HHS 01517383-90, HHS 01785946-47, HHS 01789238-39, HHS 00679729-31, HHS 01767257-60, HHS 00097324-29 and HHS 00416691, as referenced on page 8 of Lead Plaintiffs' Response To Household Defendants' Supplemental Submission In Support Of Their Motion To Amend Protective Order.

Sincerely,

Craig S. Kesch

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

VIA FEDERAL EXPRESS

[Enclosures]

CAHILL GORDON & REINDEL LLP

-2-

Adam Deutsch, Esq. (via facsimile / w/o enclosures)
Marvin A. Miller, Esq. (via facsimile / w/o enclosures)
Stanley Parzen, Esq. (via facsimile / w/o enclosures)
Thomas J. Kavaler, Esq. (w/o enclosures)
Peter Sloane, Esq. (w/o enclosures)
Landis C. Best, Esq. (w/o enclosures)