

**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,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**DECLARATION OF AZRA Z. MEHDI IN SUPPORT OF THE CLASS' MOTION TO
COMPEL ANDREW KAHR DOCUMENTS IMPROPERLY WITHHELD AS
PRIVILEGED OR DESTROYED BY THE HOUSEHOLD DEFENDANTS**

REDACTED VERSION

I, AZRA Z. MEHDI, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the States of New York and California, and the District Court for the Northern District of Illinois. I am a member of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP, counsel of record for the Lead Plaintiffs and Lead Counsel on behalf of the certified Class 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 1: Household summary of meeting with Andrew Kahr on December 18, 1998, Bates No. HHS 02861137-39;
- Exhibit 2: Memorandum from Gary Gilmer to various Household executives with subject line Initiatives to Accelerate Growth of U.S. Consumer Finance, dated January 27, 1999, Bates Nos. HHS 02861365-71;
- Exhibit 3: Memorandum from Andrew Kahr to Joe Vozar with subject line Redoing HFC Mortgage Forms To Impose High Prepayment Penalties, dated March 20, 1999, Bates Nos. HHS 02923887-92;
- Exhibit 4: Document entitled Performance Based Pricing Initiative, Bates No. HHS 02924086;
- Exhibit 5: Memorandum from Andrew Kahr to Dick Schaffer with subject line Project 7, "PBP", dated May 8, 1999, Bates Nos. HHS 03243102-05;
- Exhibit 6: Memorandum from Andrew Kahr to Gary Gilmer with subject line Customer Statements, dated May 28, 1999, Bates Nos. HHS 03243160-63;
- Exhibit 7: Memorandum from Andrew Kahr to Joe Vozar with subject line Late Fees; Parity Act; Communications, dated May 28, 1999, Bates Nos. HHS 03243158-59;
- Exhibit 8: Memorandum from Andrew Kahr to Gordon Cliff with subject line Impediments To Product and Marketing Improvements in USCF, dated May 30, 1999, Bates Nos. HHS 03243152-54
- Exhibit 9: Memorandum from Andrew Kahr to Dick Schaffer with subject line Project 7, dated May 30, 1999, Bates Nos. HHS 03243147-51
- Exhibit 10: Memorandum from Andrew Kahr to Tom Detelich with subject line Design of Projects 6B Mortgage, dated July 25, 1999, Bates Nos. HHS 02923860-62;

- Exhibit 11: Memorandum from Andrew Kahr to Vineet Saxena with subject line Considerations Affecting Marketing and Operations for Parity Act Loans, dated August 5, 1999, Bates Nos. HHS 02878164-68
- Exhibit 12: Memorandum from Andrew Kahr to Vineet Saxena with subject line Contract Language for Alternative Mortgage, dated August 7, 1999, Bates Nos. HHS 02878194-95;
- Exhibit 13: Memorandum from Andrew Kahr to Tom Detelich with subject line Analysis and Development of Projects 6B Mortgage, dated September 6, 1999, Bates Nos. HHS 02923847-48;
- Exhibit 14: E-mail from Joe Vozar dated October 21, 1999, Bates Nos. HHS 02878132-33;
- Exhibit 15: Household International Summary of Andrew Kahr Ideas Review and Commentary, Bates Nos. HHS-ED 003323-24;
- Exhibit 16: Memorandum from Andrew Kahr to Dave Schoenholz with subject line Revenue Recognition for Prepayment Penalties, dated February 1, 2000, Bates Nos. HHS 02927473-74;
- Exhibit 17: Memorandum from Andrew Kahr to Dick Schaffer with subject line Use Of Direct Debit To Reduce Losses Delinquencies, dated February 25, 2000, Bates Nos. HHS 02923906-09;
- Exhibit 18: E-mail from Bobby Mehta dated October 25, 2000, Bates No. HHS 01886647;
- Exhibit 19: Memorandum from Andrew Kahr to Tom Detelich with subject line Questions on ACH, dated December 16, 2000, Bates Nos. HHS 03352515-21;
- Exhibit 20: E-mail from Peggy Karich dated January 12, 2001, Bates Nos. HHS 03352502-07;
- Exhibit 21: Memorandum from Andrew Kahr to Paul Makowski with Obtaining Credit Reports for Loss Mitigation Purposes; FCRA, dated February 19, 2001, Bates Nos. HHS 02960780-86;
- Exhibit 22: Memorandum from Andrew Kahr to Dave Little and Mary Johnston with subject line Contractual Direct Debit Status and Opportunities, dated April 26, 2001, Bates Nos. HHS 03355495-504;
- Exhibit 23: Memorandum from Andrew Kahr to Dave Schoenholz with subject line AE Enrollment of Current USCF Customers in EZ-Pay, dated June 28, 2001, Bates Nos. HHS 03349124-26;

- Exhibit 24: Memorandum from Andrew Kahr to Chuck Colip with subject line Projects, dated January 1, 2002, Bates Nos. HHS 00123888-89;
- Exhibit 25: E-mail from Dick Klesse dated March 13, 2002, Bates No. HHS 00087225;
- Exhibit 26: SF Gate article entitled How Providian misled card holders, dated May 5, 2002;
- Exhibit 27: E-mail from Dave Schoenholz dated June 28, 2002, Bates No. HHS-E 001255.0001;
- Exhibit 28: Tom Detelich Housemail note dated January 4, 1999, Bates No. HHS 02190556;
- Exhibit 29: Document entitled Steps to finding equivalent interest rate, Bates No. HHS 03239328;
- Exhibit 30: E-mail from Tom Detelich dated July 24, 2002, Bates No. HHS 02868009-10;
- Exhibit 31: E-mail from Bruce McNair dated February 7, 2001 with attached document entitled Pay Rights Reward Program, Bates Nos. HHS 03356421-22;
- Exhibit 32: E-mail from Kathleen Curtin dated June 29, 2002 with attached document entitled Framework For the Discussion of Issues Concerning Lending Practices of Household International, Inc., Bates Nos. HHS 03070939-47;
- Exhibit 33: Letter from David Huey, Multi-State Working Group to Kathleen Curtin, HFC/Beneficial, dated August 14, 2002, Bates Nos. WA AG 018784-805;
- Exhibit 34: E-mail from John Blenke dated October 7, 2002 with attached Term Sheet, Bates Nos. WA AG 018660-91;
- Exhibit 35: Transcript of 2004 Frontline Report entitled Secret History of the Credit Card;
- Exhibit 36: Letter from Bing Z. Ryan to Samantha K. Sherman dated September 21, 2006;
- Exhibit 37: Letter from Samantha K. Sherman to Bing Z. Ryan dated October 23, 2006;
- Exhibit 38: Letter from Jason C. Davis to Landis C. Best dated December 14, 2006;
- Exhibit 39: E-mail from Landis C. Best to Jason C. Davis dated December 14, 2006;

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 9th day of January, 2007, at San Francisco, California.

s/ Azra Z. Mehdi

AZRA Z. MEHDI

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