United States Courts
Southern District of Texas
FILED

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Michael N. Milby, Clerk of Court

UNITED STATES DISTRICT COURT
SOURTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re ENRON CORPORATION SECURITIES, DERIVATIVE & "ERISA" LITIGATION	§	MDL 1446 and Consolidated, Related and Coordinated Cases
This Document Relates To:	§	
MARK NEWBY, et al., Individually and on Behalf of All Others Similarly Situated,	§	Civil Action No. H-01-3624 and Consolidated, Related and Coordinated Cases
Plaintiffs,	§	
vs.	§	
ENRON CORP., et al.,	§	
Defendants.	§	

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

AFFIDAVIT OF ALAN KAPLAN IN SUPPORT
OF THE MOTION FOR CONFIDENTIALITY ORDER

BEFORE ME, the undersigned authority, on this day personally appeared Alan Kaplan, who, being by me duly sworn, deposed as follows:

1. My name is Alan Kaplan. I am Deputy General Counsel of Barclays Capital, Americas, a division of defendant Barclays Bank PLC, a U.K. public limited company.

2. I am of sound mind, capable of making this Affidavit, and have personal knowledge of all facts stated herein (except as otherwise expressly stated), and such facts are all true and correct.

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3. I submit this Affidavit in support of the Motion for Confidentiality Order of Barclays PLC, Barclays Bank PLC and Barclays Capital Inc. (collectively, "Barclays").

4. I have worked with Barclays' employees and outside counsel to respond to Lead Plaintiff's First Request for the Production of Documents (the "Request").

5. On October 1, 2003, in response to Lead Plaintiff's Request, Barclays produced more than 400,000 pages of documents to the document depository in accordance with the Court's July 11, 2003 Scheduling Order.

6. In accordance with the Court's December 19, 2002, March 27, 2003 and September 16, 2003 Orders, Barclays has identified a limited number of documents (approximately 70 pages, or less than 0.02% of Barclays' entire production) that contain confidential personal information — personal telephone numbers and home addresses — regarding current or former Barclays' employees. Those documents are listed on Barclays' "Confidential Documents Log" (attached hereto as Exhibit 1). I have personally reviewed and am familiar with these documents.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 3, 2003

Alan Kaplan

Subscribed and sworn to me
this 3rd day of November,
2003, to certify which witness
my hand and official seal.

Notary Public

RICHARD W. KNAUB
Notary Public, State of New York
No. 02KN6086840
Qualified in New York County
Commission Expires Feb. 03, 2007

In re ENRON CORPORATION SECURITIES, DERIVATIVE, & "ERISA" LITIGATION, No. H-01-3624

CONFIDENTIAL DOCUMENT LOG OF BARCLAYS PLC, BARCLAYS BANK PLC AND BARCLAYS CAPITAL INC.

Bates Number/Range	Date	Doc. Type	Author(s)	Recipients(s)	CC(s)	Designation
BARC 000057178 - BARC 000057185	Undated	Corporate Document	Mayer Brown & Platt	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000108911 - BARC 000108912	1/21/1998	E-Mail	Clemmens, Robert	McKean, George	Pullman, Henry; Cavelli, Helen; Williams, Richard; Esposito, Sal; O'Neill, Chris	This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000113500	9/18/1998	E-Mail	Boylan, Sean	Ritchie, Timothy	Hancock, Peter; Jefferson, Ina, Rajguru, Vijay; Pierce, Janet; Rody, Gavin, Williams, Richard	This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000205353 - BARC 000205363	4/21/1999	E-Mail	Lafferty, Dennis	Rodiea, B; Mayou, Helen; Jefferson, Ian		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000219725 - BARC 000219734	2/28/1997	Corporate Document	Unknown	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000229427 - BARC 000229441	10/12/1999	Corporate Document	ENRON Corporation	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000233405 - BARC 000233410	1/14/1999	Corporate Document	Unknown	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee

CONFIDENTIAL DOCUMENT LOG OF BARCLAYS PLC, BARCLAYS BANK PLC AND BARCLAYS CAPITAL INC.

BARC 000242892 - BARC 000242893	Undated	Corporate Document	Jedi Investment	McKean, George; Calvelli, Helen; Sullivan, John, Ward, Sarah; Brown, William; Mordaunt, Christina		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000250753	Undated	Corporate Document	Unknown	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000250866	Undated	Handwritten Notes	Unknown	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000385618	7/3/2001	E-Mail	Woodhams, Martin	Sutherland, Nikola		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000401822 - BARC 000401826	8/30/2000	E-Mail	Jindrich, Scott	Palmer, Richard, McLoughlin, Glenda	Matthews, David	This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000401926	Undated	Corporate Document	Barclays Capital Inc	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000425715	Undated	Corporate Document	Unknown	Unknown		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee

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BARC 000433960	11/25/2001	E-Mail	Woodhams, Martin	Leigh, Preston-Whyte; Smith, Brian; Firth, Richard		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee
BARC 000433961	11/25/2001	E-Mail	Woodhams, Martin	Woodhams, Martin, Leigh, Preston-Whyte; Smith, Brian; Firth, Richard		This document contains personal information - personal phone numbers and/or addresses - regarding a Barclays employee