

I, Helen Hodges, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California. I am a partner with the law firm of Milberg Weiss Bershad Hynes & Lerach LLP. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Thus far, Roman McAlindon and Philip Randall's counsel have refused to accept service for them.

3. Plaintiffs are in the process of serving defendants Roman McAlindon and Philip Randall in accordance with the Hague Convention.

4. As plaintiffs understand, service under the Hague Convention can take months to be effected.

5. Defendants Roman McAlindon and Philip Randall have been sent a copy of the Complaint as a courtesy.

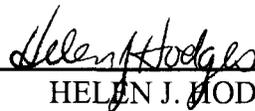
Attached are true and correct copies of the following exhibits:

Exhibit A: May 9, 2002 letter from Helen J. Hodges to William Matthews, attorney for Roman McAlindon and Philip Randall;

Exhibit B: Proof of service for defendants Andersen-United Kingdom and Andersen-Brazil; and

Exhibit C: Proof of service for defendant Andersen-India.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 7th day of June, 2002, at San Diego, California.


HELEN J. HODGES

Milberg Weiss Bershad Hynes & Lerach LLP

401 B Street, Suite 1700, San Diego, CA 92101-4297
(619) 231-1058 Fax: (619) 231-7423

www.milberg.com

New York
San Francisco
Los Angeles
Boca Raton
Seattle

May 9, 2002

VIA FACSIMILE

William Matthews
GARDERE WYNNE SEWELL LLP
1000 Louisiana, Suite 3400
Houston, TX 77002

Re: Newby v. Enron

Dear Mr. Matthews:

We have been trying to serve Roman McAlindan and Philip Randall with our Consolidated Complaint in the above-referenced action through the Hague Convention. Until you tell me that you will accept service for them, we will continue our efforts through the Hague Convention. We sent your client a copy of the Complaint as a courtesy.

Very Truly Yours,



HELEN J. HODGES

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In Re Enron Corporation Securities
Litigation

vs. This Document Relates To:
All Actions

Case Number H-01-3624

AFFIDAVIT OF SERVICE

I, Corey Fertel, being first duly sworn on oath deposes and states

that I am over the age of 21 years and not a party to this action, and on the 10 day of April, 2002,
at 03:40 PM at 33 West Monroe Street, Chicago, Illinois 60603, did serve the following document(s):

Summons, Consolidated Complaint For Violation Of The Securities Laws, Lead Plaintiffs Appendix Of
Exhibits In Support Of Consolidated Complaint and Lead Plaintiffs Appendix Of Certifications in Support
Of Consolidated Complaint

Upon Arthur Andersen (Andersen- United Kingdom)

By: Personally handing copies to: Carol Gadbois (Executive Assistant)

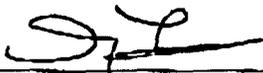
leaving copies at the usual place of abode with:

a member of the household 13 years or upwards and informed that person of the contents thereof

by mailing copies of said document(s) in a sealed envelope with postage prepaid to:

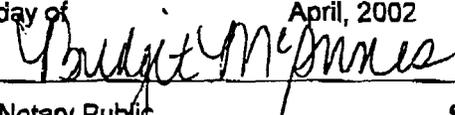
On

Description: Sex Female Race White Approximate Age 45

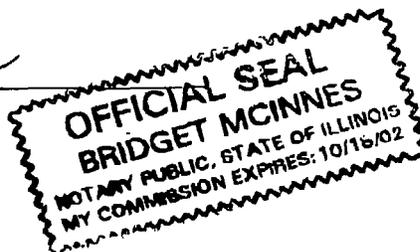


Corey Fertel

Signed and Sworn to
before me this 22
day of April, 2002



Notary Public



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Litigation

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Upon Arthur Andersen-Brazil

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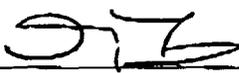
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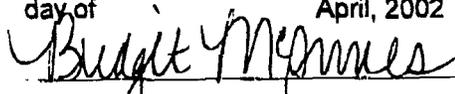
On

Description: Sex Female Race White Approximate Age 45



Corey Fertel

Signed and Sworn to
before me this 22
day of April, 2002



Notary Public



In Re Enron Corporation Securities
Litigation

vs.

This Document Relates To:

All Actions

Case Number H-01-3624

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Exhibits In Support Of Consolidated Complaint and Lead Plaintiffs Appendix Of Certifications in Support
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Upon Andersen Co. (Andersen-India)

By: Personally handing copies to: Carol Gadbois (Executive Assistant)

leaving copies at the usual place of abode with:

a member of the household 13 years or upwards and informed that person of the contents thereof

by mailing copies of said document(s) in a sealed envelope with postage prepaid to:

On

Description: Sex Female

Race White

Approximate Age

45



Corey Fertel

Signed and Sworn to
before me this

22

April, 2002



Notary Public

