

COPY

United States Courts
Southern District of Texas
FILED

JUN 28 2002

Michael N. Milby, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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 MARK NEWBY, et al., Individually and On Behalf :
 of All Others Similarly Situated, :
 :
 Plaintiffs, : Civil Action No. H-01-3624
 : (Consolidated)
 :
 vs. : CLASS ACTION
 :
 ENRON CORP., et al., : Hon. Melinda Harmon
 :
 Defendants. :
 ----- X

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 THE REGENTS OF THE UNIVERSITY OF :
 CALIFORNIA, et al., Individually and On Behalf of :
 All Others Similarly Situated, :
 :
 Plaintiffs, :
 :
 vs. :
 :
 KENNETH L. LAY, et al., :
 :
 Defendants. :
 ----- X

**DECLARATION OF JAIRAJ
PURANDARE IN SUPPORT OF
ANDERSEN-INDIA'S MOTION
TO DISMISS THE COMPLAINT**

JAIRAJ PURANDARE declares, under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner of Arthur Andersen & Co., India ("Andersen-India"). I submit this Declaration in support of Andersen-India's motion to dismiss the Consolidated Complaint (the "complaint"). I have personal knowledge of the facts set forth herein.
2. In the papers previously submitted to the Court on this motion, Andersen-India stated that from 1997 to 2000 it was not engaged by Enron Corp. and had not performed any professional services for Enron Corp. However, we discovered today in a review of files that Andersen-India did perform work in

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1999 for Enron Corp. on Indian tax issues, customs duty rates and support letter issues. These services were performed exclusively in India.

3. The remaining statements in the initial motion papers are accurate to the best of my knowledge. In particular, while Andersen-India performed statutory audits and limited agreed upon procedures in respect of certain Enron subsidiaries and associated entities in India (the latter procedures at the request of Andersen LLP, USA, in connection with its audit of Enron Corp.'s financial statements), Andersen-India did not participate in any audits of Enron Corp.

Dated: Mumbai, India
June 24, 2002



JAIRAJ PURANDARE