

1-28-2008

# Citibank (South Dakota) N.A. v. Carroll Clerk's Record v. 7 Dckt. 35053

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COPY VOL. 7098

IN THE  
SUPREME COURT  
OF THE  
STATE OF IDAHO

Citibank (South Dakota) N.A.

Plaintiff and  
Respondent  
VS.

Miriam G. Carroll

Defendant and  
Appellant

Appealed from the District Court of the Second  
Judicial District for the State of Idaho, in and

for Idaho County

Hon. John Bradbury District Judge

Pro Se

Attorney  for Appellant

Sheila R. Schwager

Attorney  for Respondent

Filed this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

\_\_\_\_\_  
Clerk

By \_\_\_\_\_ Deputy

35053

OCT 22 2007

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose E. Gehring* DEPUTY

**DOCKETED**

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Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,  
Plaintiff/Counterdefendant,  
v.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV 2006 37067

**NOTICE OF FILING OF DEPOSITION  
OF MICHAEL LARSEN, CONSUMER  
FINANCE BUREAU CHIEF FOR THE  
IDAHO DEPARTMENT OF FINANCE**

Plaintiff, Citibank (South Dakota), N.A., by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby submits this Notice of Filing of Deposition of Michael Larsen, Consumer Finance Bureau Chief for the Idaho Department of Finance. Attached as Exhibit 1 is a true and correct copy of Mr. Larsen's deposition, taken on October 5, 2007 pursuant to a Notice of Deposition served by the Defendant. Mr. Larsen's deposition testimony further confirms his statement in his Affidavit, filed on June 17, 2007, that National Banks are not subject to the Idaho Collection Agency Act.

NOTICE OF FILING OF DEPOSITION OF MICHAEL LARSEN, CONSUMER FINANCE  
BUREAU CHIEF FOR THE IDAHO DEPARTMENT OF FINANCE - 1 -

DATED THIS 17<sup>th</sup> day of October 2007.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By



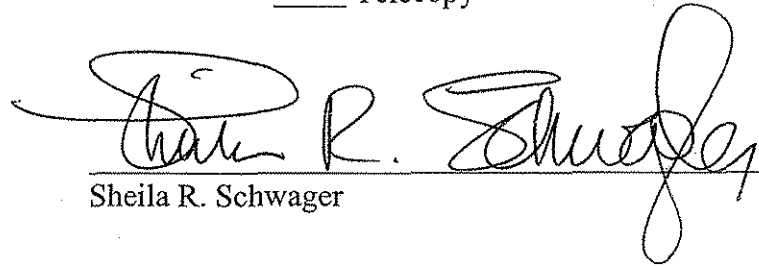
Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ~~16~~<sup>17</sup> day of July, 2007, I caused to be served a true copy of the foregoing **NOTICE OF FILING OF DEPOSITION OF MICHAEL LARSEN, CONSUMER FINANCE BUREAU CHIEF FOR THE IDAHO DEPARTMENT OF FINANCE** by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[*pro se*]

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Telecopy



Sheila R. Schwager

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IN THE DISTRICT COURT OF THE SECOND JUDICIAL  
DISTRICT OF THE STATE OF IDAHO,  
IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A, )  
 )  
Plaintif/Counterdefendant, )  
 )  
vs. ) Case No. CV-2006-37067  
 )  
MIRIAM G. CARROLL, )  
 )  
Defendant/Counterclaimant )

VOLUME 1  
Pages 1 through 14  
Deposition of Mike Larsen

Reported by  
Holly R. Cotney  
IDAHO CSR No. 263

COPY



**HEDRICK**  
COURT REPORTING

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BOISE, IDAHO 83701  
208-336-9208

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1 The Deposition of Mike Larsen, was SCHEDULED at the  
2 Instance of DEFENDANT, at the Idaho Department of Finance, 800  
3 Park Boulevard, Suite 200, city of Boise,  
4 State of Idaho, commencing at 3:00 p.m., on October 5, 2007,  
5 before Holly R. Cotney, a Notary Public in and for the State of  
6 Idaho, pursuant to notice, and in accordance with the Idaho  
7 Rules of Procedure.

8 APPEARANCES:

9 FOR DEFENDANT/COUNTERCLAIMANT, MIRIAM CARROLL:

10 Pro se

11 FOR THE PLAINTIFF/COUNTERDEFENDANT, CITIBANK (SOUTH DAKOTA) N.A.

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13 HAWLEY TROXELL ENNIS & HAWLEY LLP  
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17 Telephone: (208) 388-4928

18 FOR THE DEPARTMENT OF FINANCE:

19 Alan Conilogue, Deputy Attorney General  
20 P.O. Box 83720  
21 Boise, Idaho 83720  
22  
23  
24  
25

INDEX OF DEPOSITION

WITNESS: Mike Larsen

INDEX OF EXHIBITS

Identified

X-A...Affadavit of Mike Larsen.....5

X-B...Office of Comptroller document.8

## 1 PROCEEDINGS

2 OCTOBER 5, 2007

3 3 p.m.

4 MS. CARROLL: My name is Miriam Carroll. I'm the defendant  
5 in this case, Citibank vs. Miriam G. Carroll, Case No.  
6 CV-06-37067, Second Judicial District of the State of Idaho,  
7 County Of Idaho.

8 Today's date is October 5, 2007. This is a defendant's  
9 deposition of Michael Larsen. The purpose of this deposition is  
10 to clarify what the Department of Finance means by third party.

11 And do you put him under oath?

12 MIKE LARSEN,

13 having been first duly sworn, testified upon examination as  
14 follows:

15 EXAMINATION

16 BY MS. CARROLL:

17 Q. Please identify yourself for the record.

18 A. My name is Michael Larsen.

19 Q. State your title and department that employs you.

20 A. My title is Consumer Finance Bureau Chief at the Idaho  
21 Department of Fiance.

22 Q. And how long have you held this position?

23 A. September 11, 2003, I believe, is the year.

24 Q. What are your general responsibilities in this  
25 position?



1 A. I oversee a staff of 15 individuals. Collectively we  
2 are involved in oversight of entities that fall under the  
3 statutes -- we have regulatory authority.

4 Q. Okay, and are you making this deposition in your  
5 capacity as Bureau Chief of the Idaho Department of Finance

6 A. Yes.

7 Q. Have you been coached or prepared by anyone as to how  
8 to answer questions in this deposition?

9 A. No.

10 Q. Are you on any medications that would prevent you from  
11 answering truthfully?

12 A. No.

13 Q. Okay, Exhibit A -- let's see what this is.

14 Exhibit A is your affidavit.

15 A. Yes, that appears to be a copy of my affidavit.

16 Q. And who drafted the affidavit?

17 A. The original affidavit was drafted -- well, precisely,  
18 I don't know who, actually. It was drafted by someone at the  
19 firm of Hawley Troxell. This is the original draft.

20 Q. Okay, who selected the wording?

21 A. I do not know. Do you mean of the original draft?

22 Q. Yeah, of the affidavit. I guess of the original --  
23 who did the original? You don't know.

24 A. Are you --

25 Q. And how about the final? Who selected the wording of

1 the final draft?

2 A. I did.

3 Q. You did, okay.

4 My next question, I guess we've answered: Were there  
5 changes made to the first draft before you signed it?

6 A. Yes.

7 Q. Apparently was.

8 And who made the changes and what were the changes?

9 A. I made the changes and I do not recall what the  
10 changes were.

11 Q. Did anyone else review or approve the affidavit  
12 besides yourself?

13 A. I consulted with counsel for the Department of  
14 Finance.

15 Q. Okay. Okay. Are you familiar with the Office of the  
16 Comptroller of the Currency?

17 A. By name.

18 Q. Just by name? Are you familiar with what they do --  
19 with what the OCC does?

20 A. I have a limited understanding of what they do.

21 Q. Okay, are you familiar with the OCC handbook titled  
22 "Activities Permissible for a National Bank"?

23 A. No.

24 Q. Okay, do you expect banks to follow the OCC handbook  
25 while doing business in Idaho -- national banks?

1 A. Do I?

2 Q. Do you expect them to follow the OCC guidelines and  
3 regulations?

4 A. Now, the department has a banking -- a Bureau of  
5 Financial Institutions that deals with banks.

6 Q. Uh-hu.

7 A. I do not in my position deal with depository  
8 institutions. So are you asking me my opinion?

9 Q. Well, we're trying to find out exactly how the  
10 department handles banks.

11 A. Then you need to ask probably someone in that  
12 department -- in that bureau within the department.

13 Q. Okay. There's two sections -- now, can we get that  
14 person here or -- because you did the affidavit. We're  
15 deposing you.

16 A. Absolutely I understand that. But you've asked me a  
17 question about banks.

18 Q. Well, the affidavit is about the banks, though, yeah.

19 There are two sections in the handbook where  
20 collection activities are authorized. The first one is on the  
21 third sheet, which is page 11 of the handbook and the section is  
22 highlighted.

23 Would you, please read the highlighted section out  
24 loud?

25 A. Loan Collection and Repossession Services: National

1 banks may offer loan collection and repossession services for  
2 other banks and thrifts, OCC interpretive letter, parens,  
3 December 14th, 1983, end parens, OCC interpretive letter,  
4 parens, March 15, 1971, end parens.

5 Q. Are you familiar with this rule?

6 A. No.

7 Q. Okay, the second section is on the fourth sheet, which  
8 is page 18.

9 Would you read the highlighted section there?

10 A. Debt collection: National banks may collect delinquent  
11 loans on behalf of other lenders. May provide billing services  
12 for doctors, hospitals, or other service providers, and may act  
13 as an agent in the warehousing and servicing of other loans, OCC  
14 Interpretive Letter, parens, August 27, 1985, end parens.

15 Q. Are you familiar with this rule?

16 A. No.

17 Q. Okay, referring back to your affidavit on sheet 2,  
18 item 4, you state that the Department of Finance does not  
19 license national banks under the Idaho Collection Agency Act  
20 whether they are collecting their own debt or the debts of a  
21 third party; is that correct?

22 A. That is -- appears to be the correct wording of that  
23 affidavit, yes.

24 Q. Are the third parties you refer to in your affidavit  
25 the ones specified and authorized in this handbook by the OCC?

1 A. I don't know.

2 Q. Does your department, the Department of Finance,  
3 authorize a national bank to collect for parties which are not  
4 authorized by the OCC?

5 A. Would you repeat that question?

6 Q. Does the Department of Finance authorize a national  
7 bank to collect for parties which are not authorized by the OCC?

8 A. The Department of Finance does not have regulatory  
9 authority over national banks.

10 Q. Does anybody in Idaho have regulatory authority?

11 A. Not to my knowledge.

12 If I could ask you to clarify that question. Did you  
13 ask if anybody in Idaho has regulatory authority over national  
14 banks?

15 Q. Over national banks.

16 A. I do not know whether the Office of the Comptroller of  
17 the Currency has an office in Idaho, but I do not believe they  
18 do.

19 Q. You state in your affidavit the Department of Finance  
20 does not license national banks under the ICAA whether they are  
21 collecting their own debts or the debts of third parties because  
22 national banks are regulated lenders as defined in Idaho Code  
23 and are therefore exempt from the application of the ICAA.

24 If they are regulated lenders, then who are they  
25 regulated by?

1 A. The term "Regulated Lenders" is a defined term in the  
2 Idaho Credit Code and it does not imply they are regulated by  
3 the Idaho Department of Finance. In fact, they are not.

4 Q. But they are regulated by somebody; right?

5 A. I believe they are regulated by the Comptroller --  
6 Office of the Comptroller of the Currency?

7 Q. Yeah, and that's what we believe. And what we want to  
8 know is does Idaho allow the Office of the Comptroller of the  
9 Currency to regulate them -- or do they just let them do  
10 whatever they want?

11 This was too wide open, the third parties. Which  
12 third parties?

13 A. You asked me two questions. I was still thinking  
14 about the first question.

15 Q. Go back to the first one.

16 A. Would you repeat that first question?

17 Q. Does the Department of Finance expect the banks  
18 operating in Idaho to follow the OCC Regulations?

19 A. Well, as I said, the Department of Finance does not  
20 have a regulatory authority over national banks.

21 Q. Yeah.

22 A. And so to have --

23 Q. But somebody must -- I mean, somebody must have  
24 regulatory over national banks..

25 A. The Office of the Comptroller of the Currency.

1 Q. Yeah. Well, then Idaho would concur that the Office  
2 of Comptroller of the Currencies' regulations apply to national  
3 banks?

4 A. Yes.

5 Q. Okay.

6 I guess that's all.

7 MR. CONILOGUE: Do you need a few minutes to talk?

8 MS. CARROLL: Hu?

9 MR. CONILOGUE: Do you need a few minutes to talk?

10 MS. CARROLL: Are we allowed to?

11 MS. SCHWAGER: Sure.

12 MS. CARROLL: Okay.

13 MS. SCHWAGE: Did you want us to step out?

14 MS. CARROLL: No.

15 (Off the record.)

16 BY MS. CARROLL:

17 Q. The third parties is the whole reason we're here: It  
18 was vague. Can you clarify which third parties you mean?

19 A. I will try. Under the Idaho Collection Agency Act,  
20 there are some licensing requirements for individuals or  
21 businesses to collect for third parties. Third parties -- as  
22 Bureau Chief of the Department of Finance my interpretation of  
23 third parties is another party besides -- if a creditor is  
24 collecting on his or her or its own debts, that is not a third  
25 party to collect its debts.

1 Q. Right. But we've wondered which third parties are  
2 allowed -- but you say the OCC regulates, so I think that  
3 answers the question.

4 A. Well, I don't know if it does. I'm not sure I  
5 understood what you just said. The OCC -- if you're asking  
6 me if the OCC regulates national banks, that's my understanding.  
7 You asked about the third parties, and I'm not certain I've  
8 answered you -- answered your question yet.

9 Q. Does third parties mean anyone other than the bank?

10 A. Well, again, it's not a question of a bank or not from  
11 my perspective under the Idaho Collection Agency Act. Again,  
12 there are licensing requirements for entities that collect on  
13 behalf of third parties. That third party could be a bank, for  
14 instance. Collection agencies can collect on behalf -- and we  
15 do have -- can collect on behalf of a bank.

16 Q. Uh-hu.

17 A. But I'm trying my best to clarify this. A merchant or  
18 any creditor who extends consumer credit or makes regulated  
19 consumer loans can collect on those without a license under the  
20 Collection Agency Act because they are not -- if they are  
21 collecting on behalf of themselves then they would not be a third  
22 party --

23 Q. Yeah.

24 A. -- needing a license under the Collection Agency Act.

25 Q. Now, if they're collecting for someone other than a



1 bank do they need a permit?

2 MS. SCHWAGER: I'm sorry. Objection, it's vague. Who do  
3 you mean by "they"?

4 Q. If a national bank in Idaho is collecting for someone  
5 other than a bank, do they need a permit?

6 A. No.

7 Q. No, okay.

8 MS. CARROLL: Okay, I guess that's it.

9 MS. SCHWAGER: I have no questions:

10 MR. CONILOGUE: Thank you.

11 (Deposition concluded at approximately.

12 3:15 p.m.)

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A U T H E N T I C A T I O N

I D A H O :

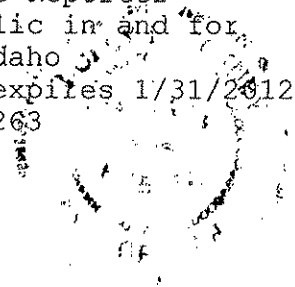
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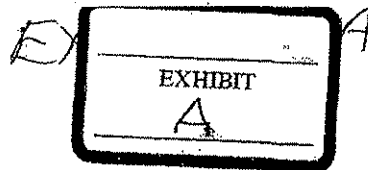
I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to writing by me; that the foregoing pages represent a true and correct transcript of the evidence upon said hearing to the best of my ability;

I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I interested in the result of said case.

*Holly R. Cotney* WITNESS my hand and official seal this the 17 day of July 2007.

*Holly R. Cotney*  
Holly R. Cotney  
Certified Court Reporter  
And Notary Public in and for  
The State of Idaho  
My commission expires 1/31/2012.  
Idaho CSR No. 263





COPY

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lmes@hteh.com

Attorneys for Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067  
AFFIDAVIT OF MICHAEL LARSEN

STATE OF IDAHO )  
County of Ada )

MICHAEL LARSEN, being first duly sworn upon oath, deposes and states as follows:

1. I am Bureau Chief of the Consumer Finance Bureau of the Idaho Department of Finance. The Idaho Department of Finance administers and enforces the Idaho Collection Agency Act ("ICAA"), Idaho Code § 26-2221, *et seq.* The Department of Finance is the state

AFFIDAVIT OF MICHAEL LARSEN - 1


agency to which applications for collection agency permits must be made. Idaho Code § 26-2223. The Department of Finance determines whether or not an applicant meets the qualifications of the ICAA. Idaho Code § 26-2229.

2. I have been contacted by a Boise attorney who stated that he is counsel for Citibank (South Dakota) N.A. ("CITIBANK"). The attorney represented to me that a question has arisen in the above-captioned action as to whether CITIBANK is required to be licensed under the ICAA, Idaho Code § 26-2221 *et seq.*, to engage in collection activities in Idaho.

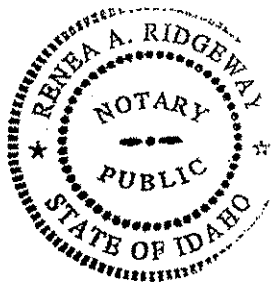
3 I am aware that CITIBANK is a national bank, and its regulator is the Office of the Comptroller of the Currency ("OCC").

4. The Department of Finance does not license national banks under the ICAA whether they are collecting their own debts or the debts of third parties because national banks are regulated lenders as defined at Idaho Code § 28-41-301(37) and are therefore exempt from the application of the ICAA, pursuant to I.C. § 26-2239(2).

DATED this 12<sup>th</sup> day of July, 2007.

  
MICHAEL LARSEN

SUBSCRIBED AND SWORN before me this 12 day of July, 2007.

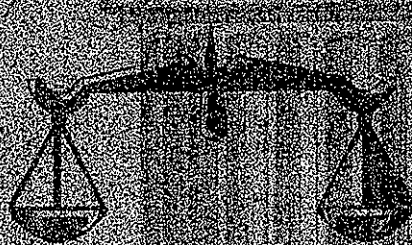


Name: Renea A. Ridgeway  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 11-20-09



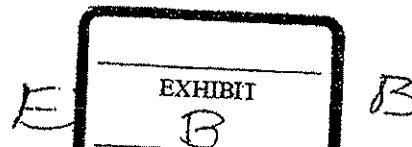
Comptroller of the Currency  
Administrator of National Banks  
U.S. Department of the Treasury

OFFICE OF THE COMPTROLLER OF THE CURRENCY  
1500 PENNSYLVANIA AVENUE, N.W.  
WASHINGTON, D.C. 20551



# Activities Permissible for a National Bank, Cumulative

2006



## Contents

<b>ACTIVITIES PERMISSIBLE FOR A NATIONAL BANK, CUMULATIVE</b> .....	<b>1</b>
<b>ACTIVITIES</b> .....	<b>1</b>
<i>General Banking Activities</i> .....	<i>1</i>
Branching .....	1
Capital .....	2
Consulting and Financial Advice .....	3
Corporate Governance and Structure .....	6
Correspondent Services .....	11
Finder Activities .....	12
Leasing .....	14
Lending .....	16
Other Activities .....	22
Payment Services .....	27
<i>Fiduciary Activities</i> .....	<i>28</i>
<i>Insurance and Annuities Activities</i> .....	<i>29</i>
Insurance Underwriting and Reinsurance .....	29
Title Insurance .....	32
<i>Securities Activities</i> .....	<i>32</i>
Derivatives .....	36
Other .....	40
Tying .....	40
<i>Technology and Electronic Activities</i> .....	<i>40</i>
Digital Certification .....	40
Electronic Bill Payments .....	41
Electronic Commerce .....	42
Electronic Correspondent Services .....	44
Electronic Storage and Safekeeping .....	44
Internet Access Service .....	44
Internet and PC Banking .....	45
Software Development, Production, and Licensing .....	46
<b>COMPLIANCE</b> .....	<b>46</b>
<i>Bank Secrecy Act/Anti-Money Laundering</i> .....	<i>46</i>
<i>Consumer</i> .....	<i>48</i>
<b>INVESTMENTS</b> .....	<b>51</b>
<i>Community Development</i> .....	<i>66</i>
<i>Other Investments</i> .....	<i>66</i>
<b>PREEMPTION</b> .....	<b>67</b>
<b>REGULATIONS</b> .....	<b>82</b>

## *Correspondent Services*

- *Correspondent Services, In General.* National banks may hold deposits for other banks and perform correspondent services for those banks, such as check clearing. Other examples of correspondent services are:
  - *ATM Sales to Other Banks and ATM Services.* National banks may purchase ATMs for resale to other banks, which will be in the same shared network, convert their own ATMs into a shared network, and provide services for other banks in the network. OCC Interpretive Letter (October 2, 1975); No-Objection Letter No. 87-11, [1988-1989 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 84,040 (November 30, 1987).
  - *Disaster Relief Services.* National banks may market disaster relief services to other banks, including sharing of premises and data processing equipment. OCC Interpretive Letter (June 13, 1990).
  - *Electronic Imaging Services.* National banks may provide electronic imaging services to banks and other financial firms. OCC Interpretive Letter No. 805, reprinted in [1997-1998 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 81-252 (October 9, 1997).
  - *Financial and Consulting Services.* National banks may offer financial and consulting services, including market research and analysis, strategic planning, advertising and promotion planning, product development, personnel management, employee relations, affirmative action, and salary and benefit plans to banks and commercial customers. OCC Interpretive Letter No. 137, reprinted in [1981-1982 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 85,218 (December 27, 1979).
  - *Flood Hazard Determinations.* National bank may establish an operating subsidiary that makes flood hazard determinations for the bank, its affiliates, and unaffiliated mortgage lenders. Corporate Decision No. 97-79, 1998 OCC QJ LEXIS 6 (July 11, 1997).
  - *Internal Security Consulting Services.* National banks may provide internal security consulting services, including security and guard services at affiliate banks and non-national bank affiliates and may install and maintain vaults, locks, and ATMs for third-party banks. OCC Interpretive Letter No. 398, reprinted in [1988-1989 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 85,622 (September 28, 1987).
  - *Investment Portfolio Management Service.* National bank may establish an operating subsidiary to provide investment portfolio management services and computer networking services for the bank and other financial institutions. OCC Interpretive Letter No. 754, reprinted in [1996-1997 Transfer Binder] Fed. Banking L. Rep. (CCH) ¶ 81,118 (November 6, 1996).
  - *Loan Collection and Repossession Services.* National banks may offer loan collection and repossession services for other banks and thrifts. OCC Interpretive Letter (December 14, 1983); OCC Interpretive Letter (March 15, 1971).
  - *Other Correspondent Services.* National banks may print and market checks, drafts, loan payment coupons, and other banking documents; perform tax planning and tax preparation assistance; and perform financial data processing for correspondent banks. OCC Interpretive Letter (February 11, 1980); OCC Interpretive Letter (October 14, 1975).
  - *Payment and Information Processing Services.* National banks may establish an operating subsidiary that engages in payment and information processing services. The subsidiary may own/operate/sell electronic data processing and data interchange facilities, which will

Carroll's Trust is  
that Mas. Trust is  
not another  
"lender"

- *Debt Collection* National banks may collect delinquent loans on behalf of other lenders, may provide billing services for doctors, hospitals, or other service providers and may act as an agent in the warehousing and servicing of other loans. OCC Interpretive Letter (August 27, 1985)
- *Debt for Equity Swaps* National banks may enter into swaps of rescheduled foreign government loans through a series of interrelated transactions and hold the equity received to extinguish the debt pursuant to the national bank's DPC authority. Similarly, national banks may exchange nonperforming or rescheduled debt acquired DPC for equity in unaffiliated companies. Letter from Ralph E. Sharpe, Deputy Comptroller Multinational banking, dated September 25, 1996; Letter from Ralph E. Sharpe, Deputy Comptroller Multinational banking, dated February 25, 1997; Letter from Ralph E. Sharpe, Deputy Comptroller Multinational banking, dated March 25, 1997; OCC Interpretive Letter No 643, reprinted in [1994 Transfer Binder] Fed. Banking L. Rep. (CCH) 83,551 (July 1, 1992); OCC Interpretive Letter No 511, reprinted in [1990-1991 Transfer Binder] Fed. Banking L. Rep. (CCH) (July 20, 1990).
- *Debtor Bank Located in State of its Main Office for UCC Purposes* As a general matter, under revised Article 9 of the Uniform Commercial Code, the location of the debtor determines which state's law governs perfection of a security interest. Section 9-307 determines the location of debtors for choice of law purposes. For purposes of this section, a debtor national bank is located in the state in which its main office is located. OCC Interpretive Letter No. 913 (August 5, 2001).
- *Direct Deposit Advance Program* A direct deposit advance program, characterized as a program of advances, pursuant to a written agreement with the customer, made to a participating deposit account in defined increments, with a fixed finance charge per increment, and limited to a portion of a customer's monthly direct deposit deposits up to a maximum balance, to be repaid upon crediting of subsequent direct deposits, or charged in full to the customer's account if not repaid within a specified time frame, constitutes open-end consumer credit for purposes of the Truth in Lending Act and Regulation Z. OCC Interpretive Letter (April 11, 2001), *publication pending*
- *Disbursing Agent* National banks may act as disbursing agent for loans made by another bank. OCC Interpretive Letter (October 18, 1974).
- *Economic Development Loans to Native Americans* National banks may make loans to certain authorized Native American organizations, with at least 20 percent of the loans guaranteed, without being subject to restrictions of other statutes regarding loan to value ratios, maturity, security, priority of lien or percentage of assets that may be invested. 25 USC 1489.
- *Escrow Services* National banks may provide escrow services. OCC Interpretive Letter (May 6, 1968)
- *Exportation of Interest Rates*. Twelve USC 85, including "most favored lender" provision, applies to operating subsidiaries in the same manner and to the same extent that it applies to the parent national bank. OCC Interpretive Letters No. 968 (February 12, 2003) and 974 (July 21, 2003).
- *Financing through Interest in LLC*. A national bank may hold an interest in a limited liability company structured to be substantially equivalent to an extension of credit, to finance an alternative energy project. The LLC would, in turn, hold interests in real estate in connection with its business. The proposed structure facilitates the provision of



IDAHO COUNTY DISTRICT COURT  
AT 2:15 FILED  
O'CLOCK P.M.

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NOV 20 2007

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Kathy Johnson* DEPUTY

Sheila R. Schwager, ISB No. 5059  
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Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,  
Plaintiff/Counterdefendant,  
v.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV 2006 37067  
CITIBANK'S RESPONSE BRIEF RE  
TESTIMONY OF MICHAEL LARSEN

Plaintiff, Citibank (South Dakota), N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby responds to Defendant Miriam G. Carroll's Brief on the Deposition of Idaho Department of Finance Consumer Bureau Chief Michael Larsen (the "Brief").

At the November 1, 2007 hearing in this matter, the Court granted Defendant leave to submit a brief limited to a single issue: whether Michael Larsen of the Idaho Department of Finance was qualified to testify in this matter. However, the Brief submitted by Defendant does not address this discrete issue; indeed, Defendant proffers no reason as to why the affidavit of Michael Larsen and his deposition testimony should be not considered by this Court. Instead,

CITIBANK'S RESPONSE BRIEF RE  
TESTIMONY OF MICHAEL LARSEN - / -

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the Brief proffers a new legal theory – that there are supposed “gaps” between the Office of the Comptroller of the Currency (“OCC”) and the Idaho Department of Finance Banking and Consumer Divisions and their respective areas of regulation, which Defendant contends this Court should bridge.

Not only did Defendant fail to adhere to the Court's order, but Defendant simply is wrong. There is no need for this Court to make the determination that Defendant proposes because the Idaho Department of Finance already has determined that a national bank like Citibank is a “regulated lender” and is therefore exempt from the ICAA. Idaho Code § 26-2239 (stating that “[t]he provision of this chapter shall not apply to . . . (2) Any regulated lender as defined in section 28-41-301(37) . . .”). Indeed, the Idaho Supreme Court previously has relied upon the interpretation of the ICAA by the Idaho Department of Finance in determining the appropriate scope of the ICAA. See Davis v. Professional Bus. Servs., Inc., 109 Idaho 810, 712 P.2d 511, 517 (1985) (relying on amicus brief of the Idaho Department of Finance).

Moreover, the OCC – which has exclusive regulatory authority over national banks -- specifically authorizes the securitization of credit card receivables as a permissible activity for a national bank and part of the business of banking. See OCC Interpretive Letter No. 540, 1991 WL 570780 at \* 3 (approving transaction in which national bank subsidiary would sell bank's credit card receivables to trust, bank would continue to service all receivables through affiliate and subsidiary would cause trust to issue participation certificates to investors); see also OCC Corporate Decision, 1998 WL 667884, at \*4 (approving the securitization of credit card receivables “as part of the business of banking” and a “permissible activity for a national bank”); OCC Interpretive Letter No. 585, 1992 WL 598402 at \* 2 (Jun. 8, 1992) (recognizing OCC's approval of asset securitization by national banks as a means of selling or borrowing against credit card receivables). In fact, the OCC specifically has approved the securitization of credit card receivables by Citibank, N.A.. See OCC Corporate Decision No. 98-39, 1998 WL 667884,

CITIBANK'S RESPONSE BRIEF RE  
TESTIMONY OF MICHAEL LARSEN - 2 -

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at \*4 (Mar. 27, 1998). Put simply, the OCC has specifically addressed, and issued rulings regarding, the conduct at issue. Defendant cannot displace that authority by seeking an order from this Court preventing or interfering with Citibank's exercise of its powers under the National Bank Act. This is particularly true here, where the Idaho Legislature clearly has enacted legislation that exempts national banks from any requirements, licensing or otherwise, under the ICAA.

Finally, notwithstanding Defendant's skewed interpretation of the ICAA, it must be remembered that the asset securitization process both starts and ends with Citibank maintaining ultimate control of the credit card accounts, the Issuance Trust and Master Trust. Citibank owns all the credit card accounts involved in the asset securitization process and that Citibank is seeking to collect a debt which it owns, thus precluding the ICAA's application. See I.C. §§ 26-2222, 26-2223; Purco Fleet Servs., Inc. v. Idaho State Dept. of Fin., 140 Idaho 121, 90 P.3d 346, 350 (2004); see Citibank's Supplemental Reply Brief in Support of Summary Judgment at 10-13. The fact that the receivables relating to the Account may have been removed from the Master Trust when the Account was charged-off does not change the fact that Defendant's debt, and the corresponding obligation to repay such debt, is owed to Citibank, and not to the Master Trust, trustee or third-party investors. The fact that Citibank uses its assets (*i.e.*, its credit card receivables) as an investment vehicle does not alter Defendant's agreement to honor her debt to Citibank. Even after this latest round of briefing, it remains clear that Defendant simply is conjuring up new theories in order to continue to avoid liability for the transactions on the Account that Defendant authorized and agreed to pay.

Based upon the forgoing and the reasons discussed in Citibank's Supplemental Brief and at the November 1, 2007 hearing, Citibank respectfully requests that the Court enter summary judgment in favor of Citibank and against Defendant.

CITIBANK'S RESPONSE BRIEF RE  
TESTIMONY OF MICHAEL LARSEN - 3 -

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DATED THIS 20<sup>th</sup> day of November 2007.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By   
Loren K. Messerly, ISB No. 7434  
Attorneys for Plaintiff/Counterdefendant

CITIBANK'S RESPONSE BRIEF RE  
TESTIMONY OF MICHAEL LARSEN - 4 -

41834.0007.1095480.1

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20<sup>th</sup> day of November, 2007, I caused to be served a true copy of the foregoing CITIBANK'S RESPONSE BRIEF RE TESTIMONY OF MICHAEL LARSEN by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[pro se]

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Telecopy



\_\_\_\_\_  
Loren K. Messerly

DOCKETED

DEC 21 2007

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose E. Gehring* DEPUTY

Sheila R. Schwager, ISB No. 5059  
Loren K. Messerly, ISB No. 7434  
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lmes@hteh.com

Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

MOTION FOR ENTRY OF JUDGMENT  
AND REQUEST FOR ATTORNEY FEES  
AND COSTS

COMES NOW, Plaintiff/Counterdefendant Citibank (South Dakota), N.A. ("Plaintiff" or "Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, and hereby applies to this Court for entry of final judgment regarding the obligation due and owing on the Defendant's, Miriam G. Carroll, credit card account ("Account") and Citibank's attorney fees and costs. The request is made pursuant to this Court's Memorandum of Decision and Order dated December 10, 2007, granting summary judgment to Citibank ("Summary Judgment Order"), and pursuant to Idaho Code Sections 12-120 and 12-121. This Motion is supported by

MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS - 1

the Affidavit of Terri Ryning In Support of Motion For Entry of Judgment, the Affidavit of Sheila R. Schwager In Support of Plaintiff's Motion for Entry of Judgment and Request for Attorney Fees and Costs, and all records and files of the Court in this matter. Accordingly, Plaintiff is entitled to entry of judgment for \$40,812.81 in principal and interest due and owing on the Account, plus an award of attorney fees and costs in the sum of \$51,545.97, for a total judgment of \$92,358.78.

### **I. Introduction and Background**

This is a simple collection lawsuit filed by Citibank against the Defendant to collect amounts due on her credit card Account. This straightforward suit was unnecessarily complicated by the Defendant's baseless counterclaims and numerous motions, discovery and briefs that ultimately resulted in a two-year lawsuit, multiple court hearings, and substantial attorney fees and costs being incurred by Citibank.

#### **A. The Account**

Carroll applied for her Account on or about February 16, 1999. See Affidavit of Terri Ryning In Support of the Motion for Summary Judgment ("Ryning - SJ Aff."). Carroll does not dispute the fact that she used her Account to transfer significant amounts to pay off other credit cards and/or purchases made by her. See Affidavit of Sheila Schwager In Support of the Motion for Summary Judgment ("Schwager - SJ Aff.") (Defendant's Answer to Request for Admission Nos. 38, 40, 41-43, 45-52). In fact, Carroll specifically admits that she requested such transfers, over \$24,000 of which were to pay other creditors. Schwager - SJ Aff., Exh. 1 (Defendant's Answer to Request for Admissions Nos. 45-52); Ryning - SJ Aff., ¶ 3, Exh. 2. Thereafter, in late 2004, Carroll simply stopped paying the Account, leaving a balance of \$20,884.30.

Schwager SJ-Aff., Exh. 2 (Defendant's Answers to Admissions Nos. 7, 13). By the time this suit was filed in 2005, the Account balance was \$24,567.91.

Carroll stopped paying the Account, despite the provisions of the Account Card Agreement, which provides for the award of attorney fees and costs. See Ryning - SJ Aff., Exh. 4. The Card Agreement, referred to and cited to in Citibank's summary judgment briefing, specifically provides, "If we refer collection of your account to a lawyer who is not our salaried employee, you will have to pay our attorney's fee plus court costs or any other fees, to the extent permitted by law. If we sue to collect and you win, we will pay your reasonable legal fees and court costs." See Memorandum In Support of Plaintiff's Motion For Summary Judgment, filed January 19, 2007, at p.22; Card Agreement, attached as Exhibit 4 to the Ryning - SJ Aff., at p.7. Thus, the parties' agreement specifically authorizes the assessment of attorney fees and costs being sought in this Motion.

**B. The Litigation**

Citibank initially filed a collection action against the Defendant for unpaid amounts due and owing on the Account. Defendant did not file a timely Answer and a Default Judgment was entered. Defendant then appeared and filed a motion to set aside the Default Judgment, which this Court granted. Defendant filed an Answer to the Plaintiff's Complaint and Counterclaims. The parties proceeded with extensive written discovery related to Plaintiff's claims and the Defendant's counterclaims.

This case began as the product of a nationwide scheme sold and advocated over the Internet by the debt elimination industry and marketed to credit cardholders as a way to attempt to avoid paying their legitimate credit card bills. Citibank and other credit card companies have recently been inundated with form counterclaims from cardholders asserting vague, purported



errors relating to billing statements (“Billing Error Dispute” claims). The hallmark of these Billing Error Disputes is that cardholders typically assert elusive, and often times unintelligible, claims in various form letters that a billing error has occurred within the meaning of the Federal Truth in Lending Act, 15 U.S.C. § 1601, et seq., Regulation Z promulgated thereunder (12 C.F.R. § 226), and the Fair Credit Billing Act, 15 U.S.C. § 1666, et seq.. The strategy is an attempt to overwhelm the bank with frivolous paper, hoping that some of it will be ignored; that the bank will not treat the dispute as a legitimate “billing error;” and that the consumer will receive a windfall of statutory damages.

Because Defendant’s counterclaims alleged such Billing Error Disputes, Citibank was forced to proceed with discovery. Upon proceeding with discovery, Citibank was served with multiple sets of discovery by the Defendant, which forced Citibank to incur attorney fees and costs to respond and address via oral argument at several hearings. The Defendant also filed *multiple discovery motions and motions that were not permitted under the Idaho Rules of Civil Procedure*, such as the Motion for Evidentiary Hearing Regarding Dispute Letter. Like the discovery issued by the Defendant, Citibank was also forced to oppose each of the Defendant’s frivolous motions with a response and proceed with oral argument. Not surprisingly, discovery provided no facts to support Defendant’s Counterclaims.

Accordingly, in January of 2007, Citibank filed a motion for summary judgment to resolve all issues in the case, requesting Judgment on its collection action and dismissal of all of Defendant’s Counterclaims. In response, the Defendant did not deny the undisputed facts set forth by Citibank. Instead, the Defendant devised a new strategy to avoid paying her Account. She now claimed that Citibank could not pursue the collection action because Citibank supposedly did not have standing and/or was required to be licensed pursuant to the Idaho

Collection Agency Act (the "ICAA"). This Court entered a briefing schedule and set a hearing date to address those specific issues.

Despite good faith warnings from Citibank's counsel regarding the significant additional attorney fees that would be incurred in addressing such issues, and the irrelevance of such arguments in light of the undisputed fact that Citibank owned the Account, Defendant chose to proceed with extensively litigating those issues.

Over the next ten (10) months, Defendant filed multiple motions and briefs, requiring Citibank to respond and incur substantial attorney fees. Specifically, during the course of this litigation, the Defendant filed twelve (12) motions (motion to dismiss lack of personal jurisdiction and venue; set aside default; compel discovery; amend answer; evidentiary hearing on dispute letter; compel discovery; amend answer; set aside judicial notice; amend scheduling order; show cause; compel discovery; dismiss for lack of standing). The Defendant also submitted five (5) separate sets of discovery requests, including a total of one hundred ten (110) requests for admission; seven (7) interrogatories and twenty-six (26) requests for production. Eight (8) briefs were filed by the Defendant, in support of the various motions or supplemental briefs. These filings required responses from Citibank, with attendant attorney fees and costs. All of these briefs, all of these motions, and all the discovery did not change the fact that Defendant owes the Account, the fact of which Defendant has always been aware and has specifically admitted in this litigation. Thus, the hundreds of pages of documents, the hundreds of hours of attorney time and the thousands of dollars in out of pocket costs, was a complete and unnecessary waste of time, money and resources, for both this Court and the parties.

In summary, the Defendant's failure to pay the outstanding obligation owed on her Account necessitated this action. Her counterclaims, discovery, multiple motions and hearings,

caused Citibank to incur significant attorney fees and costs. Citibank has prevailed on the numerous issues that were unnecessarily raised by the Defendant and has obtained summary judgment. Hence, because of Defendant's actions in litigating this case, Citibank is not only entitled to the Account balance, it is also entitled to reasonable attorney fees and costs, for which Defendant is responsible pursuant to the parties' agreement and Idaho statute, § 12-120(3).

## **II. Amounts Due Citibank**

### **A. The Account Balance**

As established in the Affidavit of Terri Ryning submitted in support of this Motion, the Defendant's last Account statement dated June 16, 2005 reflected a balance of \$24,567.91, with accruing interest at 29.99%. Terri Ryning Aff., ¶ 3, Exh. A. A total of \$16,244.79 in interest has accrued from the date of the filing of this action, October 6, 2005 through December 20, 2007, the date of this Motion. *Id.*, ¶ 4. The per diem rate of interest after December 20, 2007 is \$20.18. *Id.* Thus, the total amount due and owing by the Defendant on her Account is \$40,812.81, plus accruing interest from December 20, 2007, and attorney fees and costs. *Id.*, ¶ 5.

### **B. Attorney Fees and Costs**

#### **(1) Citibank is entitled to its attorney fees and costs under both the parties' contract and the Idaho Rules of Civil Procedure.**

Idaho law enforces contractual provisions granting attorney fees and costs, such as the Card Agreement governing the Account. I.C. § 12-120(3); *Mountainview Landowners Co-Op Ass'n, Inc., v. Cool*, 142 Idaho 861, 136 P.2d 332, 337 (2006) ("Contract provisions for attorney fees are generally enforced."); *Opportunity L.L.C. v. Ossewarde*, 136 Idaho 602, 610, 38 P.3d 1258, 1266 (2002); *Holmes v. Holmes*, 125 Idaho 784, 787, 874 P.2d 595, 598 (Ct. App. 1994).

In addition, an award of attorney fees and costs is warranted under Idaho law when claims, such as the claims made by the Defendant in this case, are pursued frivolously, unreasonably, and

without foundation. I.C. § 12-121; *Sunshine Mining Co. v. Metropolitan Mines Corp.*, 111 Idaho 654, 726 P.2d 766 (1986).

In this case, the Card Agreement provides for the award of attorney fees and costs. See *Ryning - SJ Aff.*, Exh. 4. It specifically provides that, if Citibank sues to collect and wins, “you will have to pay our attorney’s fee plus court costs or any other fees, to the extent permitted by law.” See Memorandum In Support of Plaintiff’s Motion For Summary Judgment, filed January 19, 2007, at p.22; Card Agreement, attached as Exhibit 4 to the *Ryning - SJ Aff.*, at p.7. Thus, the parties’ agreement specifically authorizes the assessment of attorney fees and costs against the Defendant in this case.

Not only does the Card Agreement authorize the assessment of attorney fees and costs, Citibank is entitled to fees and costs under Idaho law. Specifically, under Idaho Rule of Civil Procedure 54(d)(1)(B), a prevailing party such as Citibank is entitled to costs. Idaho courts follow the rule that unless a “prevailing party” is determined to have prevailed only in part, that party is entitled to its full reasonable attorney fee. See *Irwin Rogers Ins. Agency, Inc. v. Murphy*, 122 Idaho 270, 276-77, 833 P.2d 128, 134-35 (Ct. App. 1992) (in determining which of the parties has prevailed, the trial court is required to consider the final result of the action in relation to the relief sought by the respective parties, whether there were multiple claims and issues, and the extent to which each party has prevailed upon each of the following issues or claims); *Ramco v. H-K Contractors, Inc.*, 118 Idaho 108, 113, 794 P.2d 1381, 1388 (1990); *Nalen v. Jenkins*, 113 Idaho 79, 741 P.2d 366 (Ct. App. 1987). In the present case, Citibank was awarded summary judgment on its collection action and a dismissal of the Defendant’s counterclaims. Hence, Citibank is the prevailing party and entitled to an award of its full reasonable attorney fee.

**(2) Citibank's Attorney Fees and Costs are Reasonable**

The factors to be considered by the Court in determining the reasonableness of attorney fees to be awarded in a civil action are as follows:

- A. The time and labor required.
- B. The novelty and difficulty of the questions.
- C. The skill requisite to perform the legal service properly and the experience and ability of the attorney in the particular field of law.
- D. The prevailing charges for like work.
- E. Whether the fee is fixed or contingent.
- F. The time limitations imposed by the client or the circumstances of the case.
- G. The amount involved and the results obtained.
- H. The undesirability of the case.
- I. The nature and length of the professional relationship with the client.
- J. Awards in similar cases.
- K. Any other factor which the court deems appropriate in the particular case.

I.R.C.P. 54(e)(3); *see Nalen v. Jenkins*, 113 Idaho 79, 81, 741 P.2d 366 (Ct. App. 1987).

The application of the factors set forth in Rule 54(e)(3) to this case supports the award of Citibank's attorney fees. First, the time and labor required was reasonable and necessary as specifically detailed in the attorney time records attached to the Affidavit of Sheila Schwager. The legal issues raised by the Defendant regarding standing and the licensing requirements under the ICAA required extensive legal research, careful analysis, and multiple oral arguments to this Court. These issues were unnecessarily complicated by the Defendant, but nevertheless

demanded response by Citibank. Not only was this research and briefing necessary in this case, it appears that the Court intends to apply such legal analysis in other independent litigation between the Defendant and other credit card companies. *See fn. 2*, Summary Judgment Order.

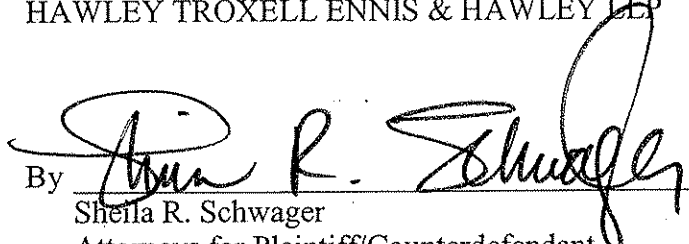
Second, a high rate of skill and experience was required to research, draft briefs and argue these issues. The prevailing charges for like work would range from \$200 per hour and upwards. See Affidavit of Sheila Schwager. Here, the rate of \$185.00 charged by Citibank's counsel is a reduced rate for the prevailing charge for like work. The total amount of attorney fees is commensurate with the work and is supported by the result obtained.

Third, as this Court is well aware by virtue of the multitude of filings by the Defendant and as briefly outlined above, the amount of work to properly handle this matter was enormous. Indeed, the Court's findings expressed in the Summary Judgment Order support a full attorney fee award.

Accordingly, Citibank respectfully requests an award of attorney fees and costs in the sum of \$51,545.97 (\$49,161 in fees; \$2,384.97 in costs), which the Defendant forced Citibank to incur in this action pursuant to the terms of the Card Agreement, Idaho Code § 12-120(3) and Idaho Code § 12-121. The \$51,545.97 in fees and costs should be added to the Account balance of \$40,812.81, for a total of \$92,358.78. Thus, Citibank requests that the attached proposed judgment be entered against Defendant Miriam Carroll in the total amount of \$92,358.78, plus interest at the legal rate from the date of the judgment and Citibank's post-judgment collection costs, including reasonable attorney fees and such other relief as this Court deems appropriate.

DATED THIS 19<sup>th</sup> day of December, 2007.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By 

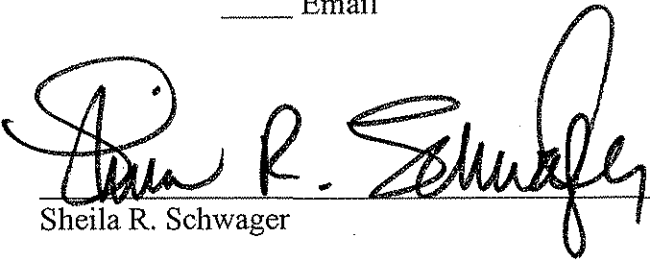
Sheila R. Schwager  
Attorneys for Plaintiff/Counterdefendant  
Citibank (South Dakota), N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19<sup>th</sup> day of December, 2007, I caused to be served a true copy of the foregoing MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS by the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamah, ID 83536  
[pro se]

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Telecopy
- Email

  
\_\_\_\_\_  
Sheila R. Schwager



Sheila R. Schwager, ISB No. 5059  
Loren K. Messerly, ISB No. 7434  
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[lmes@hteh.com](mailto:lmes@hteh.com)

Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,  
Plaintiff/Counterdefendant,

vs.

MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

JUDGMENT

Plaintiff Citibank (South Dakota), N.A. ("Plaintiff") having filed this action against Defendant Miriam G. Carroll ("Defendant") and having defended the counterclaim filed by Defendant; Plaintiff having filed a motion for summary judgment on January 19, 2007, requesting judgment on its claims and on Defendant's counterclaims; this Court having entered its Memorandum Decision and Order on December 10, 2007, granting Plaintiff's Motion for Summary Judgment; and good cause appearing therefore;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, that Defendant's Counterclaims are DISMISSED with prejudice.

IT IS FURTHER HEREBY ORDERED, ADJUDGED, AND DECREED, that Judgment is awarded in favor of Plaintiff and against Defendant Miriam G. Carroll as follows:

1. In the amount of \$24,567.91, as the principal balance due on her credit card account with Plaintiff, plus \$16,244.79 in accrued interest from October 6, 2005 to December 20, 2007, for a total amount of principal and interest of \$40,812.81 as of December 20, 2007, plus accruing interest from December 20, 2007, at the per diem rate of \$20.18, to the date of this Judgment; and
  2. Reasonable attorney's fees in the amount of \$ \_\_\_\_\_; and
  3. Costs in the amount of \$ \_\_\_\_\_; and
  4. Interest on the total judgment amount at the legal rate, to accrue commencing effective from the date of this Judgment.
  5. Plaintiff's post-judgment collection costs, including reasonable attorney fees.
- DATED THIS \_\_\_\_\_ day of December, 2007.

---

JOHN BRADBURY  
DISTRICT JUDGE

CLERK'S CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this \_\_\_ day of December, 2007, I caused to be served a true copy of the foregoing JUDGMENT By the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
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Sheila R. Schwager  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000 |  
P.O. Box 1617 |  
Boise, Idaho 83701-1617

U.S. Mail, Postage Prepaid  
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 Telecopy

Clerk of the Court

By \_\_\_\_\_  
Deputy Clerk

DEC 21 2007

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Nancy Johnson* DEPUTY

DOCKETED

Sheila R. Schwager, ISB No. 5059  
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lmes@hteh.com

Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,	)	
	)	Case No. CV-2006-37067
Plaintiff/Counterdefendant,	)	
vs.	)	AFFIDAVIT OF TERRI RYNING IN
	)	SUPPORT OF MOTION FOR ENTRY
MIRIAM G. CARROLL,	)	OF JUDGMENT
	)	
Defendant/Counterclaimant.	)	
	)	

TERRI RYNING, being first duly sworn upon oath, deposes and states as follows:

1. I am competent and make this affidavit based upon personal knowledge and review of business records described herein. I am employed by Citicorp Credit Services, Inc. (USA), a servicing company for Citibank (South Dakota), N.A. ("Citibank"). I am authorized to make this affidavit on behalf of Citibank in support of Citibank's Motion for Entry of Judgment. I share custodianship and have access to all of the documents in the possession of Citibank that are germane to this case. Citibank maintains records in the ordinary course of its business.

Those records include, but are not limited to, card member agreements for credit card accounts,

correspondence relating to credit card accounts, account notes, account payments, periodic statements, and similar types of information. Those records are made at or near the time of each event recorded, by someone with personal knowledge of the events, or from information transmitted by someone with personal knowledge of each event, and a business duty to set forth information in a report or record.

2. On or about October 6, 2005, Citibank filed a complaint in this action (the "Complaint") against Defendant Miriam Carroll ("Carroll"), to collect amounts due on Carroll's Citibank credit card account number XXXX XXXX XXXX 2596 ("Account").

3. The Account Balance of \$24,567.91, with interest accruing on the Account balance is 29.99%, is reflected in the Account statement with the closing date of June 16, 2005. Attached hereto as Exhibit 1 is a true and correct copy of the June 16, 2005 Account statement.

4. A total of \$16,244.79 in interest from October 6, 2005 to December 20, 2007 (the date Citibank's Motion for entry of Judgment is to be filed) has accrued on the Account Balance.<sup>1</sup> The per diem rate of interest after December 20, 2007 is \$20.18.

5. Citibank therefore requests that a judgment be entered against Ms. Carroll in the amount of \$40,812.81, plus per diem interest from December 20, 2007 to the date of the judgment and, interest thereafter at the legal rate, plus attorney fees and costs incurred in this matter.

---

<sup>1</sup> Interest on the Account Balance accrues at the rate of 29.99%. Using simple interest computes to a per diem rate of \$20.18 (\$24,567.91 times 29.99% [\$7,367.91 per year] divided by 365 days, which equals \$20.18 per day). Accordingly, multiplying \$20.18 times the 805 days between October 6, 2005 and December 20, 2007 results in interest owed in the amount of \$16,244.90.

Further your affiant sayeth naught.

CITIBANK (SOUTH DAKOTA), N.A.

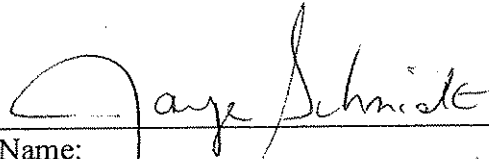
By 

Terri Rynning

Its: Authorized Agent

STATE OF MISSOURI     )  
  ) ss.  
County of Platte         )

SUBSCRIBED AND SWORN before me this 14<sup>th</sup> day of December, 2007.



Name:

Notary Public for Missouri

My commission expires 7/5/09

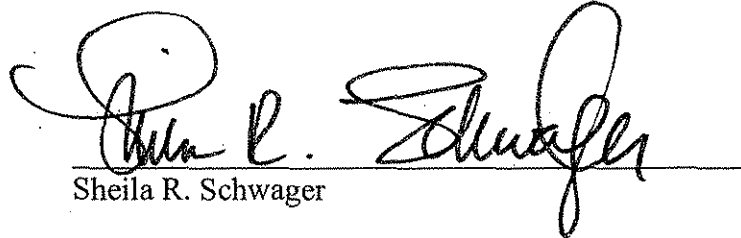
**JAYE SCHMIDT**  
Notary Public - Notary Seal  
State of Missouri  
Clay County  
My Commission Expires July 5, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14<sup>th</sup> day of December, 2007, I caused to be served a true copy of the foregoing AFFIDAVIT OF TERRI RYNING IN SUPPORT OF MOTION FOR ENTRY OF JUDGMENT by the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy  
 Email

  
\_\_\_\_\_  
Sheila R. Schwager

07/11/05 \$24567.91 \$24567.91 SITE:KC-CL TM:CO-5000 ACID:KCC1961  
 05/11/06 20:52:54

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV  
 88901-6411

MIRIAM G CARROLL  
 [REDACTED]  
 [REDACTED]

ID



**Citi® Diamond Preferred™ Entertainment Card**

Account Number  
 [REDACTED] 2596

**Customer Service:**  
 1-800-756-4000  
 24X 6000  
 THE LAKES, NV  
 9163-6000

Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
\$22100	\$0	\$5000	\$0	\$24567.91
Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
06/16/2005	\$2467.91	\$3188.89	\$620.72	\$24567.91

Debit Date	Post Date	Category	Activity Since Last Statement	Amount
	6/16		Standard Purch	
			LATE FEE - MAY PAYMENT PAST DUE	39.00
	6/16		66 0000	0000000000
			OVER CREDIT LIMIT FEE	35.00
	6/16		62 0000	0000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	8.14
	6/16		84 0000	0000000000
			Balance Transfer - Charged To Offer 4	
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	117.24
	6/16		84 0000	0000000000
			Balance Transfer - Charged To Offer 5	
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	490.34
	6/16		84 0000	0000000000

Your late fee was based on your account balance as of the payment due date (06/10/05), which was \$23,878.19.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$23,878.19	\$74.00	\$0.00	\$615.72	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$23,878.19	\$74.00	\$0.00	\$615.72	\$24,567.91

Days This Billing Period: 31

Late Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$319.64	0.08216%(D)	29.990%	29.990%
Offer 4	\$4,603.19	0.08216%(D)	29.990%	29.990%
Offer 5	\$19,251.98	0.08216%(D)	29.990%	29.990%
ADVANCES				
Standard Adv	\$0.00	0.08216%(D)	29.990%	29.990%

1547

EXHIBIT A



IDAHO COUNTY DISTRICT COURT  
AT 4:05 FILED  
O'CLOCK P.M.

DEC 21 2007

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Nathaly Johnson* DEPUTY

DOCKETED

Sheila R. Schwager, ISB No. 5059  
Loren K. Messerly, ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,	)	Case No. CV-2006-37067  AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS
Plaintiff/Counterdefendant,	)	
vs.	)	
MIRIAM G. CARROLL,	)	
Defendant/Counterclaimant.	)	
	)	

SHEILA R. SCHWAGER, being first duly sworn upon oath, deposes and states as follows:

1. I am a partner of the law firm of Hawley Troxell Ennis & Hawley LLP, counsel of record for Plaintiff/Counterdefendant Citibank (South Dakota), N.A. ("Citibank"), in the above-captioned case. I make this Affidavit in Support of Application for Attorney Fees and Costs pursuant to Idaho Code §§ 12-120 and 12-121.

AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AND  
REQUEST FOR ATTORNEY FEES AND COSTS - 1

2. Attached hereto as Exhibit A are the itemized bills and edit lists for the attorney fees and costs advanced by Hawley Troxell Ennis & Hawley LLP for representation of Citibank in the above-captioned case. The invoices have been redacted to protect privileged information. The bills and edit lists contain identification of the attorneys and paralegals working on this matter, the amount of time devoted to the matter, kept in tenth of an hour increments (six minutes each), and the total extended charge for each entry. From these lists, the final bill on the matter is computed, and the statement issued to the client is produced by the computer.

3. The fees of Hawley Troxell Ennis & Hawley LLP were computed and charged in this case on an hourly basis. Each attorney and paralegal assigned to the case kept contemporaneous time records which detailed the work performed and the time devoted to such work. For billing purposes, each hour is divided in ten equal parts of six minutes each. Time records kept by attorneys and paralegals were entered into a computer and statements were rendered from such computerized records.

4. The hourly rates charged by the attorneys and paralegals who performed service in connection with this case are detailed in the attached billing statements. Service rates of the attorneys and paralegals were selected based on the nature of the work required to be performed and the most cost effective manner in which to complete it.

5. Based on my experience and knowledge of legal fees charged by Hawley Troxell Ennis & Hawley LLP, and other law firms in Idaho, in connection with lawsuits of a similar nature and my familiarity with the facts of this case and the services performed, I believe the hourly rates charged and time devoted to this matter by Hawley Troxell Ennis & Hawley LLP were reasonable and resulted in total fees and costs advanced, which are commensurate with charges in like cases.

6. Each of the attorneys assigned to this matter charged reduced rates, due to the relationship with Citibank. For instance, my standard billing rate in 2007 was \$200 per hour; yet, I billed Citibank at the reduced hourly rate of \$185 per hour. To the best of my knowledge and belief, the sum of \$51,545.97 constitutes reasonable attorney fees and costs necessarily incurred by Citibank in this case.

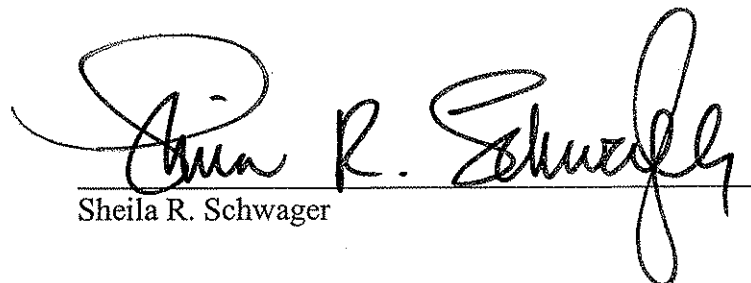
7. The costs are generally broken down as follows:

Copy charges	667.00
Binding	1.27
Postage	110.65
Long distance	21.53
Computer Assisted Legal Research	491.06
Overnight Delivery	323.21
Telecopy	3.23
Travel Expenses For Hearings in Grangeville, Idaho	385.62
Witness Fee – David F. Capps	40.40
Deposition Transcript – Mike Larsen	49.00
Hearing Transcript	188.50
Process Serving Fee	<u>122.00</u>

Total Costs \$2,384.97

8. As established in Citibank's Motion, because of Defendant's actions in litigating this case, Citibank has incurred the above stated reasonable attorney fees and costs, for which Defendant is responsible pursuant to her credit card agreement and pursuant to Idaho statute, § 12-120(3).

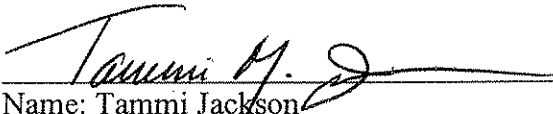
Further your affiant sayeth naught.

  
Sheila R. Schwager

STATE OF IDAHO            )  
  ) ss.  
County of Ada                )

SUBSCRIBED AND SWORN before me this 19th day of December, 2007.



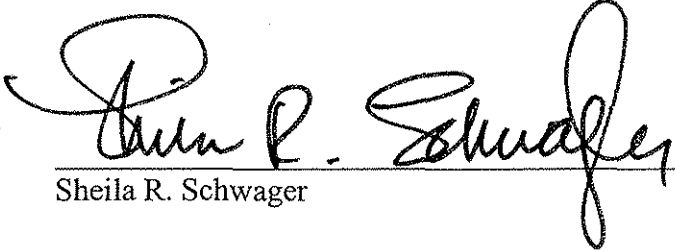
  
Name: Tammi Jackson  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 8/28/09

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19<sup>th</sup> day of December, 2007, I caused to be served a true copy of the foregoing AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS by the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[pro se]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy  
 Email

  
\_\_\_\_\_  
Sheila R. Schwager

CITICORP CREDIT SERVICES, INC  
████████████████████  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Sep 11, 2006  
INVOICE NO.: 184808  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Aug 31, 2006  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
-----

Atty	Description	Hours	Rate	Amount
----	-----	-----	-----	-----
08/17/06 SRS	REVIEW PLEADINGS, DISCOVERY, AND MOTIONS FILED IN CASE; WORK ON CASE STRATEGY RE SAME; REVIEW NOTICE OF HEARING RE MOTION FOR EVIDENTIARY HEARING.	1.60 Hrs	\$185/hr	\$296.00
08/18/06 SRS	FINISH REVIEW OF DISCOVERY AND MOTION FOR EVIDENTIARY HEARING RE BILLING DISPUTE; WORK ON ISSUES RE SAME; REVIEW NOTICE OF HEARING RE SAME; EXTENSIVE CORRESPONDENCE TO CLIENT RE ANALYSIS, OPTIONS IN HOW TO PROCEED, AND RELATED COSTS; WORK ON ISSUES RE ANSWER TO AMENDED ANSWER AND COUNTERCLAIM; CORRESPONDENCE TO M. CARROLL RE SUBSTITUTION OF COUNSEL; TELEPHONE CONFERENCE WITH CLIENT RE STRATEGY; WORK ON OBJECTION ISSUES.	2.60 Hrs	\$185/hr	\$481.00
08/18/06 JASH	REVIEW MOTION FOR EVIDENTIARY HEARING AND ANALYZE POTENTIAL RESPONSE; REVIEW AMENDED ANSWER AND COUNTERCLAIM; REVIEW CLIENT DOCUMENTS INCLUDING SAMPLE PLEADINGS, DISCOVERY REQUESTS, AND RECENT CASES INVOLVING BILLING DISPUTE LETTER SCAMS; REVIEW FILE DOCUMENTS.	1.50 Hrs	\$145/hr	\$217.50
08/21/06 SRS	REVIEW FORM BRIEFING AND STATE COURT DECISIONS IN FAVOR OF CITIBANK; WORK ON ISSUES FOR	1.90 Hrs	\$185/hr	\$351.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

OPPOSITION BRIEFING; TELEPHONE  
CONFERENCE WITH COURT CLERK RE  
CONTINUING HEARING DATE AND  
STATUS; CORRESPONDENCE TO CLIENT  
RE STATUS AND HEARING DATE;  
DRAFT, REVISE, FINALIZE AND FILE  
MOTION FOR CONTINUATION OF  
HEARING DATE; DRAFT, REVISE,  
FINALIZE AND FILE ORDER RE SAME;  
REVIEW NOTICE OF REQUEST FOR JURY  
TRIAL.

08/21/06 JASH	REVIEW LEGAL RESEARCH RE BILLING ERROR DISPUTE LETTERS; REVIEW LEGAL RESEARCH RE TIMELINESS REQUIREMENT OF BILLING DISPUTE LETTERS UNDER THE TRUTH IN LENDING ACT; REVIEW RULE 56(F) OF THE IDAHO RULES OF CIVIL PROCEDURE AND RELATED CASE LAW RE CONTINUANCE OF SUMMARY JUDGMENT PROCEEDINGS DURING DISCOVERY; BEGIN DRAFTING OPPOSITION TO CARROLL'S MOTION FOR EVIDENTIARY HEARING.	4.20 Hrs	\$145/hr	\$609.00
08/22/06 SRS	WORK ON ISSUES RE SPOUSAL PRIVILEGE, DISCOVERY, OBJECTION, AND ANSWER TO COUNTERCLAIM.	0.40 Hrs	\$185/hr	\$74.00
08/22/06 JASH	CONTINUE DRAFTING OPPOSITION TO CARROLL'S MOTION FOR EVIDENTIARY HEARING; LEGAL RESEARCH RE AFFIRMATIVE DEFENSES TO TRUTH IN LENDING ACT ACTION; DRAFT ANSWER TO AMENDED COUNTERCLAIM.	6.80 Hrs	\$145/hr	\$986.00
08/23/06 SRS	WORK ON OBJECTION TO MOTION FOR EVIDENTIARY HEARING RE DISPUTE LETTER.	1.20 Hrs	\$185/hr	\$222.00
08/24/06 SRS	REVISE OBJECTION TO MOTION FOR EVIDENTIARY HEARING; REVISE ANSWER TO COUNTERCLAIM; CORRESPONDENCE TO CLIENT RE SAME; WORK ON DISCOVERY ISSUES AND STRATEGY RE SAME.	3.90 Hrs	\$185/hr	\$721.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

08/25/06 SRS	CORRESPONDENCE WITH CLIENT [REDACTED] [REDACTED] [REDACTED]	0 20 Hrs	\$185/hr	\$37.00
08/28/06 JASH	LEGAL RESEARCH RE WAIVER OF THE HUSBAND-WIFE PRIVILEGE; LEGAL RESEARCH RE INABILITY TO USE A PRIVILEGE AS BOTH A SWORD AND A SHIELD; DRAFT MEET AND CONFER LETTER TO MIRIAM CARROLL.	4.50 Hrs	\$145/hr	\$652.50
08/30/06 SRS	REVIEW DEMAND LETTER FROM CARROLL RE ORIGINAL AGREEMENT; WORK ON ISSUES RE SAME; TELEPHONE CONFERENCE WITH CLIENT CONTACT RE SAME.	0.20 Hrs	\$185/hr	\$37.00
08/31/06 SRS	CORRESPONDENCE TO [REDACTED] [REDACTED]; REVIEW RESPONSE RE SAME; BRIEF REVIEW OF REVISIONS TO MEMORANDUM AND ANSWER; RESPONSE RE SAME AND STRATEGIES; FOLLOW UP CORRESPONDENCE [REDACTED] [REDACTED]	0.60 Hrs	\$185/hr	\$111.00
Total Legal Services:		29.60 Hrs		\$4,796.00

Legal Services Summary

SHEILA R. SCHWAGER	12.60 hours at	\$185.00 =	\$2,331.00
JOHN ASHBY	17.00 hours at	\$145.00 =	\$2,465.00

Client Charges

COPYING	-	285 copies	\$28.50
LONG DISTANCE			\$0.64
COMPUTER ASSISTED LEGAL RESEARCH			\$115.00
POSTAGE			\$2.19
OVERNIGHT DELIVERY			
08/21/06	OVERNIGHT DELIVERY - FEDERAL EXPRESS		15.68
	CORPORATION SHIPMENT TO CLERK OF THE COURT		\$15.68



CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

Total Client Charges	\$162.01
	-----
TOTAL THIS BILL	\$4,958.01
	=====
TOTAL AMOUNT DUE	\$4,958.01

CITICORP CREDIT SERVICES, INC.  
[REDACTED]  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Oct 5, 2006  
INVOICE NO.: 185606  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Sep 30, 2006  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
-----

Atty	Description	Hours	Rate	Amount
----	-----	-----	-----	-----
08/24/06 JASH	DRAFT THIRD SET OF DISCOVERY REQUESTS TO DEFENDANT MIRIAM CARROLL; LEGAL RESEARCH RE EVIDENTIARY ISSUES TO ADDRESS IN MEET AND CONFER LETTER TO MIRIAM CARROLL RE INCOMPLETE AND DEFICIENT RESPONSES TO FIRST AND SECOND SET OF DISCOVERY REQUESTS.	4.20 Hrs	\$145/hr	\$609.00
09/03/06 SRS	REVIEW CORRESPONDENCE [REDACTED] [REDACTED]	0.10 Hrs	\$185/hr	\$18.50
09/04/06 SRS	BRIEF REVIEW RE LIMITATIONS UNDER FAIR CREDIT REPORTING ACT; REVIEW CORRESPONDENCE [REDACTED] [REDACTED] A [REDACTED] REVISE AND FINALIZE ANSWER TO COUNTERCLAIMS	0.60 Hrs	\$185/hr	\$111.00
09/05/06 SRS	REVISE AND FINALIZE OBJECTION TO MOTION FOR EVIDENTIARY HEARING ON DEFENDANT'S DISPUTE LETTER; REVIEW CARROLL'S DISCOVERY RESPONSES TO SECOND SET OF DOCUMENT REQUESTS, ADMISSIONS, AND INTERROGATORIES, REVISE AND FINALIZE MEET AND CONFER LETTER RE CARROLL'S DEFICIENT DISCOVERY RESPONSES; REVIEW DISCOVERY RESPONSES FILED BY J. WILSON AND AGREEMENTS PRODUCED; REVIEW	5.70 Hrs	\$185/hr	\$1,054.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

DEMAND LETTER BY M. CARROLL RE  
CARDHOLDER AGREEMENT; DRAFT  
LETTER TO M. CARROLL RE RESPONSE  
TO DEMAND FOR SIGNED AGREEMENT.

09/09/06 SRS	WORK ON REVISIONS TO THIRD SET OF INTERROGATORIES, THIRD SET OF REQUEST FOR PRODUCTION OF DOCUMENTS AND THIRD SET OF ADMISSIONS.	1.20 Hrs	\$185/hr	\$222.00
09/13/06 SRS	REVIEW CARROLL'S REPLY MEMORANDUM IN SUPPORT OF MOTION FOR EVIDENTIARY HEARING; REVISE AND FINALIZE DISCOVERY; FORWARD SAME TO CLIENT FOR REVIEW.	1.10 Hrs	\$185/hr	\$203.50
09/14/06 SRS	PREPARE FOR HEARING RE CARROLL'S MOTION FOR EVIDENTIARY HEARING; REVISE AND FINALIZE THIRD SET OF ADMISSIONS, REQUEST FOR PRODUCTION OF DOCUMENTS, AND REQUEST FOR INTERROGATORIES; ATTEND HEARING RE PLAINTIFF'S MOTION FOR EVIDENTIARY HEARING; CORRESPONDENCE WITH CLIENT RE [REDACTED]	1.90 Hrs	\$185/hr	\$351.50
Total Legal Services:		14.80 Hrs		\$2,570.00
Legal Services Summary				
SHEILA R. SCHWAGER		10.60 hours at	\$185.00 =	\$1,961.00
JOHN ASHBY		4.20 hours at	\$145.00 =	\$609.00
Client Charges				
-----				
COPYING - 918 copies				\$91.80
LONG DISTANCE				\$0.73
POSTAGE				\$7.02
OVERNIGHT DELIVERY				
09/05/06	OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO CLERK OF THE COURT			24.02
09/05/06	OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO MIRIAM CARROLL			25.47
				\$49.49

CITICORP CREDIT SERVICES, INC  
[REDACTED]  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Nov 8, 2006  
INVOICE NO.: 186479  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Oct 31, 2006  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
-----

Atty	Description	Hours	Rate	Amount
----	-----	-----	-----	-----
10/10/06 JASH	DRAFT FOLLOW-UP LETTER TO MIRIAM CARROL DEMANDING RESPONSE TO DISCOVERY REQUESTS.	0.30 Hrs	\$125/hr	\$37.50
10/17/06 SRS	REVIEW DISCOVERY RESPONSES.	0.30 Hrs	\$185/hr	\$55.50
10/18/06 SRS	CORRESPONDENCE TO CLIENT RE [REDACTED] S.	0.20 Hrs	\$185/hr	\$37.00
10/20/06 SRS	BRIEF REVIEW OF DISCOVERY; CORRESPONDENCE TO CLIENT RE [REDACTED]	0.20 Hrs	\$185/hr	\$37.00
10/23/06 SRS	WORK ON DISCOVERY RESPONSE ISSUES AND STRATEGY FOR MOTION TO COMPEL AND SUMMARY JUDGMENT; CORRESPONDENCE TO CLIENT [REDACTED] REVIEW RESPONSE RE SAME; FOLLOW UP CORRESPONDENCE TO CLIENT [REDACTED] [REDACTED]	0.60 Hrs	\$185/hr	\$111.00
10/23/06 JASH	REVIEW MIRIAM CARROLL'S SUPPLEMENTAL DISCOVERY RESPONSES TO FIRST AND SECOND SET OF DISCOVERY; REVIEW CARROLL'S RESPONSES TO THIRD SET OF DISCOVERY; ANALYZE DISCOVERY RESPONSES TO DETERMINE WHICH DISCOVERY RESPONSES REQUIRE A MOTION TO COMPEL; ANALYZE DISCOVERY TO DETERMINE THE EXTENT THAT FURTHER DISCOVERY AND	2.80 Hrs	\$125/hr	\$350.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

DEPOSITIONS ARE NECESSARY TO  
BRING SUCCESSFUL MOTION FOR  
SUMMARY JUDGMENT.

Total Legal Services:	----- 4.40 Hrs	----- \$628.00
Legal Services Summary		
SHEILA R. SCHWAGER	1.30 hours at \$185.00 =	\$240.50
JOHN ASHBY	3.10 hours at \$125.00 =	\$387.50
Client Charges		
----- COPYING - 221 copies		\$22.10
LONG DISTANCE		\$0.02
POSTAGE		\$0.39
OVERNIGHT DELIVERY		
10/31/06 OVERNIGHT DELIVERY FEDERAL EXPRESS CORPORATION SHIPMENT TO MIRIAM CARROLL ON 10/11/06		18.65
		\$18.65
Total Client Charges		----- \$41.16
TOTAL THIS BILL		\$669.16
TOTAL AMOUNT DUE		===== \$669.16

CITICORP CREDIT SERVICES, INC  
[REDACTED]  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Dec 11, 2006  
INVOICE NO.: 187709  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Nov 30, 2006  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
-----

Atty	Description	Hours	Rate	Amount
----	-----	-----	-----	-----
11/01/06 SRS	REVIEW ADDITIONAL PROPOUNDED DISCOVERY AND WORK ON ISSUES RE SAME.	0.20 Hrs	\$185/hr	\$37.00
11/03/06 JASH	REVIEW MIRIAM CARROLL'S THIRD SET OF DISCOVERY REQUESTS TO CITIBANK	0.40 Hrs	\$125/hr	\$50.00
11/07/06 JASH	RECEIVE AND REVIEW EMAIL [REDACTED] [REDACTED]	0.20 Hrs	\$125/hr	\$25.00
11/10/06 JASH	BEGIN DRAFTING RESPONSES TO MIRIAM CARROLL'S THIRD SET OF DISCOVERY REQUESTS.	1.20 Hrs	\$125/hr	\$150.00
11/14/06 SRS	WORK ON DISCOVERY RESPONSES.	0.30 Hrs	\$185/hr	\$55.50
11/15/06 JASH	DRAFT RESPONSES TO CARROLL'S THIRD SET OF DISCOVERY RESPONSES; LEGAL RESEARCH RE RELEVANCY OF DISCOVERY REQUESTS RELATED TO THE FEDERAL RESERVE AND THE CREATION AND FUNDING OF CREDIT CARD ACCOUNTS; DRAFT LETTER TO MIRIAM CARROLL EXPLAINING RELEVANCE ISSUES AND INFORMING HER THAT CITIBANK WILL SEEK ITS ATTORNEYS' FEES.	2.50 Hrs	\$125/hr	\$312.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

11/20/06 SRS	REVISE LETTER TO M. CARROLL RE DISCOVERY RESPONSES AND POTENTIAL FOR RECOVERY OF ATTORNEY FEES AND COSTS.	0.30 Hrs	\$185/hr	\$55.50
11/26/06 SRS	REVISE DISCOVERY RESPONSES TO INTERROGATORIES, REQUEST FOR PRODUCTION OF DOCUMENTS, AND ADMISSIONS.	1.60 Hrs	\$185/hr	\$296.00
11/27/06 SRS	REVISE DISCOVERY RESPONSES TO INTERROGATORIES, ADMISSIONS, AND REQUEST FOR PRODUCTION OF DOCUMENTS; CORRESPONDENCE TO CLIENT RE [REDACTED] [REDACTED]	2.70 Hrs	\$185/hr	\$499.50
11/28/06 SRS	REVIEW DISCOVERY RESPONSE REVISIONS BY CLIENT; TELEPHONE CONFERENCE WITH [REDACTED]; REVISE AND MAKE FINAL REVISIONS; FORWARD FINAL RESPONSE [REDACTED] [REDACTED] TELEPHONE CONFERENCE [REDACTED], ASSIGNMENT ISSUES, AND DEPOSITIONS; REVIEW MESSAGE FROM CLIENT RE EVIDENTIARY HEARING; CORRESPONDENCE TO CLIENT RE [REDACTED]	0.90 Hrs	\$185/hr	\$166.50
11/29/06 SRS	WORK ON DEPOSITION ISSUES; [REDACTED]	0.50 Hrs	\$185/hr	\$92.50
11/29/06 JASH	LEGAL RESEARCH TO DETERMINE PROPER LOCATION FOR MIRIAM CARROL DEPOSITION; REVIEW RESPONSES TO CARROL'S DISCOVERY REQUESTS.	0.30 Hrs	\$125/hr	\$37.50
11/30/06 SRS	WORK ON DEPOSITION ISSUES.	0.20 Hrs	\$185/hr	\$37.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

Total Legal Services: -----  
11 30 Hrs \$1,814.50

Legal Services Summary  
SHELLA R. SCHWAGER  
JOHN ASHBY

6 70 hours at \$185 00 = \$1,239 50  
4 60 hours at \$125 00 = \$575 00

Client Charges

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COPYING - 13 copies \$1.30  
LONG DISTANCE \$2.36

Total Client Charges \$3.66  
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TOTAL THIS BILL \$1,818.16

Previous Bills Outstanding

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11/08/06 186479 \$669 16

TOTAL AMOUNT DUE =====  
\$2,487.32



CITICORP CREDIT SERVICES, INC  
[REDACTED]  
14000 CITI CARDS WAY, CI-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Jan 9, 2007  
INVOICE NO.: 188572  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Dec 31, 2006  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services

Atty	Description	Hours	Rate	Amount
12/03/06 SRS	REVIEW PAYMENT DOCUMENTS AND BALANCE TRANSFER DOCUMENTS FOR PRODUCTION; CORRESPONDENCE TO CLIENT [REDACTED]	0 20 Hrs	\$185/hr	\$37.00
12/04/06 SRS	CORRESPONDENCE WITH CLIENT RE [REDACTED] WORK ON ADDITIONAL REVIEW OF DOCUMENTS AND PREPARATION FOR DOCUMENT PRODUCTION; FINALIZE AND FORWARD DISCOVERY RESPONSES; TELEPHONE CONFERENCE WITH KAMIAH INSURANCE AGENT RE DEPOSITION ISSUES; WORK ON COST ISSUES OF SAME.	0.90 Hrs	\$185/hr	\$166.50
12/06/06 SRS	WORK ON CALCULATION OF EXPENSES FOR RURAL DEPOSITION AND WORK ON ANALYSIS OF OTHER STRATEGY SUCH AS SUMMARY JUDGMENT; CORRESPONDENCE TO CLIENT RE [REDACTED] REVIEW RESPONSE RE SAME; WORK ON SAME.	0 40 Hrs	\$185/hr	\$74.00
12/08/06 JASH	LEGAL RESEARCH RE BILLING ERROR DISPUTE LETTERS AND REQUIREMENTS OF TIMELY NOTICE AND SPECIFICITY OF CLAIMED BILLING ERRORS.	3 20 Hrs	\$125/hr	\$400.00
12/11/06 JASH	LEGAL RESEARCH RE REQUIREMENT THAT BILLING ERROR DISPUTE LETTERS BE IN GOOD FAITH; WORK ON	5.50 Hrs	\$125/hr	\$687.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

MEMORANDUM IN SUPPORT OF MOTION  
FOR SUMMARY JUDGMENT.

12/12/06 JASH	REVIEW CARROLL'S MEET AND CONFER LETTER AND DRAFT RESPONSE TO SAME.	0.30 Hrs	\$125/hr	\$37.50
12/13/06 SRS	FINALIZE LETTER TO CARROLL RE DISCOVERY ISSUES; CORRESPONDENCE WITH CLIENT RE [REDACTED]	0.20 Hrs	\$185/hr	\$37.00
12/18/06 SRS	REVIEW ADDITIONAL DOCUMENTS PRODUCED BY CLIENT; DRAFT SUPPLEMENTAL DISCOVERY RESPONSES; RESEARCH ADDITIONAL CASE LAW RE TILA AND DEBT ELIMINATION SCHEMES FOR SUMMARY JUDGMENT; REVIEW STATUTE RE SAME; REVIEW DEFENDANT'S PRIOR BRIEFING AND DISCOVERY RESPONSES FOR SUPPORT FOR SUMMARY JUDGMENT BRIEF; RESEARCH INTERNET RE DEBT RELIEF SITE USED BY DEFENDANT; WORK ON SUMMARY JUDGMENT MOTION AND MEMORANDUM	4.50 Hrs	\$185/hr	\$832.50
12/19/06 SRS	REVISE SUMMARY JUDGMENT MEMORANDUM, EXHIBITS, AND AFFIDAVIT IN SUPPORT THEREOF.	4.50 Hrs	\$185/hr	\$832.50
12/20/06 SRS	WORK ON REVISIONS TO MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AND EXHIBITS RE SAME; REVIEW CORRESPONDENCE FROM M. CARROLL RE DISCOVERY ISSUES; WORK ON ISSUES RE SAME; CORRESPONDENCE TO CLIENT [REDACTED] AS WELL AS SUMMARY JUDGMENT BRIEFING.	3.50 Hrs	\$185/hr	\$647.50
12/27/06 JASH	CORRESPONDENCE WITH [REDACTED] RE [REDACTED]	0.10 Hrs	\$125/hr	\$12.50
12/27/06 LMES	WORK ON MOTION FOR PROTECTIVE ORDER AND RESPONSES RE DISPUTED DISCOVERY.	2.50 Hrs	\$135/hr	\$337.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

12/29/06  
LMES WORK ON MEMORANDUM IN SUPPORT OF 2.50 Hrs \$135/hr \$337.50  
PROTECTIVE ORDER.

Total Legal Services: 28.30 Hrs \$4,439.50

Legal Services Summary

SHEILA R. SCHWAGER 14.20 hours at \$185.00 = \$2,627.00  
JOHN ASHBY 9.10 hours at \$125.00 = \$1,137.50  
LOREN MESSERLY 5.00 hours at \$135.00 = \$675.00

Client Charges

COPYING - 188 copies \$18.80

LONG DISTANCE \$2.93

COMPUTER ASSISTED LEGAL RESEARCH \$99.20

POSTAGE \$1.26

OVERNIGHT DELIVERY

12/15/06 OVERNIGHT DELIVERY FEDERAL EXPRESS 21.57

CORPORATION SHIPMENT TO MIRIAM CARROLL ON  
12/4/06

\$21.57

Total Client Charges

\$143.76

TOTAL THIS BILL

\$4,583.26

Previous Bills Outstanding

12/11/06 187709 \$1818.16

TOTAL AMOUNT DUE

=====

\$6,401.42

CITICORP CREDIT SERVICES, INC.  
[REDACTED]  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Feb 8, 2007  
INVOICE NO.: 189499  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Jan 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
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Atty	Description	Hours	Rate	Amount
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01/01/07 SRS	REVIEW CORRESPONDENCE FROM [REDACTED] [REDACTED]; FINALIZE AND FILE SAME; DRAFT LETTER TO M. CARROLL RE SAME.	0.30 Hrs	\$185/hr	\$55.50
01/01/07 LMES	REVIEW AND REVISE MEMORANDUM IN SUPPORT OF PROTECTIVE ORDER.	4.20 Hrs	\$140/hr	\$588.00
01/02/07 SRS	WORK ON REVISIONS TO MOTION FOR PROTECTIVE ORDER AND EXHIBITS RE SAME; FINALIZE AND FILE DISCOVERY RESPONSES AND LETTER TO M CARROLL RE SAME.	2.40 Hrs	\$185/hr	\$444.00
01/03/07 SRS	REVISE MOTION FOR A PROTECTIVE ORDER AND AFFIDAVIT RE SAME	1.20 Hrs	\$185/hr	\$222.00
01/04/07 SRS	REVISE MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER; CORRESPONDENCE WITH CLIENT [REDACTED] [REDACTED] FINALIZE AND FILE SAME.	1.20 Hrs	\$185/hr	\$222.00
01/05/07 KROY	REVIEW FILES; PLEADINGS; DRAFT AFFIDAVIT OF S. SCHWAGER IN SUPPORT OF SUMMARY JUDGMENT; WORK ON AFFIDAVIT OF T. RYNING.	5.00 Hrs	\$120/hr	\$600.00
01/08/07 KROY	FURTHER WORK ON AFFIDAVIT OF T. RYNING; REVIEW AND REVISE MEMORANDUM IN SUPPORT OF SUMMARY	2.50 Hrs	\$120/hr	\$300.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

JUDGMENT; AFFIDAVIT OF S  
SCHWAGER.

01/09/07 SRS	WORK ON SUMMARY JUDGMENT MEMORANDUM.	0.20 Hrs	\$185/hr	\$37.00
01/10/07 SRS	REVIEW NEW CASE WON BY DISCOVER RE SAME BILLING ERROR DISPUTE LETTER; REVISE SUMMARY JUDGMENT MEMORANDUM AND AFFIDAVITS; WORK ON EXHIBITS FOR CITIBANK'S AFFIDAVIT; CORRESPONDENCE TO CLIENT [REDACTED]; CORRESPONDENCE WITH CLIENT [REDACTED] [REDACTED], REVIEW ORDER RE SAME; RESPONSE RE SAME.	2.30 Hrs	\$185/hr	\$425.50
01/11/07 SRS	REVIEW REVISED AFFIDAVIT IN SUPPORT OF SUMMARY JUDGMENT FROM CLIENT; RESPONSE RE SAME; REVIEW HEARING NOTICE FOR CARROLL'S MOTION TO AMEND AND MOTION TO COMPEL DISCOVERY; REVIEW TIMING OF RESPONSE AND WORK ON ISSUES RE SAME.	0.20 Hrs	\$185/hr	\$37.00
01/15/07 SRS	[REDACTED] [REDACTED]; WORK ON REVISIONS; REVIEW RULE 11 AND ADD PROVISION IN BRIEF RE REQUEST FOR ATTORNEY FEES AND COSTS; WORK ON OPPOSITION TO MOTION TO AMEND COMPLAINT AND MOTION TO COMPEL DISCOVERY; CORRESPONDENCE TO CLIENT [REDACTED]	3.00 Hrs	\$185/hr	\$555.00
01/15/07 LMES	DRAFT OPPOSITION BRIEFS TO MOTION TO COMPEL DISCOVERY AND MOTION TO AMEND COMPLAINT; RESEARCH ISSUE OF AFFIRMATIVE DEFENSE OF STANDING AND REASONS FOR DENYING MOTION TO AMEND COMPLAINT.	4.80 Hrs	\$140/hr	\$672.00
01/16/07 LMES	REVISE OBJECTION TO MOTION TO COMPEL AND MOTION TO AMEND; ADD NEW CASES RE FUTILITY OF	5.40 Hrs	\$140/hr	\$756.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

AMENDMENT; DRAFT RESPONSES TO  
SPECIFIC DISCOVERY THAT DEFENDANT  
SEEKS TO COMPEL; DRAFT AFFIDAVIT  
FROM CLIENT TO SUPPORT DISCUSSION  
OF STANDING.

01/17/07 SRS	REVISE OBJECTION TO DEFENDANT'S MOTION TO AMEND ANSWER TO COMPLAINT; REVISE OBJECTION TO MOTION TO COMPEL; CORRESPONDENCE TO CLIENT [REDACTED]; SEVERAL TELEPHONE CONFERENCES [REDACTED] [REDACTED] REVISE T. RYNING'S AFFIDAVIT IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; CORRESPONDENCE [REDACTED] [REDACTED]	2.60 Hrs	\$185/hr	\$481.00
01/17/07 LMES	WORK ON OBJECTION TO MOTION TO AMEND; RESEARCH CASES INVOLVING ASSIGNMENT OF INTEREST IN RECEIVABLES AND DIVISION OF LEGAL AND EQUITABLE INTEREST IN COLLECTION ACTION; RESEARCH EDGAR RE PROSPECTUS [REDACTED] [REDACTED]	1.20 Hrs	\$140/hr	\$168.00
01/18/07 SRS	FINALIZE AND FILE MOTION FOR SUMMARY JUDGMENT; MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; AFFIDAVIT OF TERRI RYNING IN SUPPORT OF MOTION FOR SJ; AFFIDAVIT OF S SCHWAGER IN SUPPORT OF MOTION FOR SJ, NOTICE OF HEARING RE SAME; FINALIZE AND FILE OBJECTION TO MOTION TO AMEND; FINALIZE AND FILE OBJECTION TO MOTION TO COMPEL.	2.90 Hrs	\$185/hr	\$536.50
01/22/07 SRS	REVIEW CARROLL'S OPPOSITION BRIEF TO CITIBANK'S MOTION FOR A PROTECTIVE ORDER; WORK ON ANALYSIS OF SAME; CORRESPONDENCE TO CLIENT [REDACTED] TELEPHONE CONFERENCE [REDACTED] WORK ON PREPARATION FOR HEARING RE MOTION FOR PROTECTIVE ORDER AND OPPOSITION TO MOTION TO AMEND COMPLAINT AND MOTION TO COMPEL	0.70 Hrs	\$185/hr	\$129.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

DISCOVERY

01/25/07 SRS	WORK ON PREPARATION FOR HEARING RE MOTION FOR PROTECTIVE ORDER AND OBJECTION TO MOTION TO AMEND AND MOTION TO COMPEL; WORK ON SUMMARY JUDGMENT ISSUES; REVIEW SEC PROSPECTUS FOR PREPARTAION FOR HEARING; ATTEND HEARING RE MOTION FOR PORTECTIVE ORDER AND OBJECTION TO MOTION TO AMEND AND MOTION TO COMPEL; CORRESPONDENCE TO CLIENT [REDACTED]; [REDACTED]	3.90 Hrs	\$185/hr	\$721.50
01/26/07 SRS	REVIEW ADDITIONAL SEC DOCUMENTS FORWARDED AND FILED BY M. CARROLL; TELEPHONE CONFERENCE [REDACTED]; WORK ON PLEADING TO RESPOND TO JUDGE'S DEBT COLLECTION ISSUE AND FULL SEC SUBMISSION; WORK ON DISCOVERY ISSUES; TELEPHONE CONFERENCE [REDACTED] [REDACTED] [REDACTED] REVIEW COLLECTION STATUTE AND ANALYZE ADDITIONAL EXEMPTIONS; [REDACTED] [REDACTED]	3.90 Hrs	\$185/hr	\$721.50
01/26/07 LMES	FIND AND PRINT MOST RECENT PROSPECTUS; WORK ON DRAFT OF SUPPLEMENT TO MOTION FOR PROTECTIVE ORDER; FINISH DRAFT OF DISCOVERY RE: EXPERT	1.30 Hrs	\$140/hr	\$182.00
01/28/07 SRS	FINALIZE FOURTH SET OF DISCOVERY REQUESTS REGARDING POTENTIAL EXPERT WITNESS RECENTLY MENTIONED BY DEFENDANT.	0.40 Hrs	\$185/hr	\$74.00
01/29/07 SRS	REVIEW MOTION FOR JUDICIAL NOTICE, CERTIFICATE, AND OCC PUBLIC FILING [REDACTED] REVIEW EVIDENCE RULES AND IDAHO STATUE RE REQUIREMENTS FOR TAKING JUDICIAL NOTICE; REVISE REQUEST FOR JUDICIAL NOTICE;	1.60 Hrs	\$185/hr	\$296.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

CORRESPONDENCE [REDACTED]  
[REDACTED] TELEPHONE CONFERENCE [REDACTED]  
[REDACTED]; REVIEW  
REVISIONS AND FINALIZE SAME;  
DRAFT PROPOSED ORDER TAKING  
JUDICIAL NOTICE OF SUPERVISION  
AND EXEMPTION FROM STATUTE;  
FINALIZE EXHIBITS; FILE  
PLEADINGS.

Total Legal Services: 51.20 Hrs \$8,224.00

Legal Services Summary

SHEILA R. SCHWAGER	26.80 hours at \$185.00 =	\$4,958.00
LOREN MESSERLY	16.90 hours at \$140.00 =	\$2,366.00
KATHY N ROYSTER	7.50 hours at \$120.00 =	\$900.00

Client Charges

COPYING - 2,272 copies	\$227.20
BINDING	\$1.27
LONG DISTANCE	\$2.67
COMPUTER ASSISTED LEGAL RESEARCH	\$10.98
POSTAGE	\$43.41
DOMESTIC TELECOPY	\$1.50

Total Client Charges \$287.03

TOTAL THIS BILL \$8,511.03

Previous Bills Outstanding

12/11/06	187709	\$1818.16
01/09/07	188572	\$4583.26

TOTAL AMOUNT DUE \$14,912.45



CITICORP CREDIT SERVICES, INC.  
[REDACTED]  
14000 CITI CARDS WAY, C1-B236  
JACKSONVILLE, FL 32258

INVOICE DATE: Mar 7, 2007  
INVOICE NO.: 190434  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Feb 28, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services  
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Atty	Description	Hours	Rate	Amount
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02/01/07 SRS	REVIEW MOTION TO CONTINUE SUMMARY JUDGMENT HEARING; WORK ON RESPONSE TO SAME; CORRESPONDENCE TO CLIENT [REDACTED]	0.40 Hrs	\$185/hr	\$74 00
02/02/07 SRS	REVIEW POOLING AND SERVICE AGREEMENT AND DEFAULT ISSUE; WORK ON OUTLINE FOR OBJECTION TO CONTINUATION OF SUMMARY JUDGMENT HEARING AND BRIEFING DEADLINES; REVIEW IRCP 56(F) IN REGARD TO SAME; REVIEW SEC FILING FOR RESPONSE TO MOTION TO CONTINUE SUMMARY JUDGMENT HEARING DATE AND BRIEFING DEADLINES; DRAFT OBJECTION TO CONTINUATION OF SUMMARY JUDGMENT HEARING DATE; CORRESPONDENCE TO [REDACTED]	3.30 Hrs	\$185/hr	\$610 50
02/05/07 SRS	REVIEW REVISIONS TO OBJECTION TO MOTION FOR CONTINUANCE [REDACTED]; TELEPHONE CONFERENCE [REDACTED] [REDACTED] REVISE OBJECTION; REVIEW ORDER TAKING JUDICIAL NOTICE THAT IDAHO COLLECTIONS ACT IS NOT APPLICABLE TO CITIBANK; REVISE OBJECTION TO MOTION FOR CONTINUANCE ACCORDINGLY; DRAFT AFFIDAVIT TO SUBMIT PROSPECTUS AND POOLING AGREEMENT TO COURT; REVIEW CITIGROUP SITE ONLINE TO ATTEMPT TO OBTAIN MORE RELEVANT SERVICING AGREEMENT; TELEPHONE	2.70 Hrs	\$185/hr	\$499.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

	CALL [REDACTED]; [REDACTED]; WORK ON EXHIBITS; REVIEW FINAL CHANGES [REDACTED]			
02/07/07 SRS	REVIEW CARROLL'S MOTION FOR RECONSIDERATION; CORRESPONDENCE TO CLIENT [REDACTED]	0.20 Hrs	\$185/hr	\$37.00
02/12/07 SRS	BRIEFLY REVIEW AMENDED MOTION TO CONTINUE SUMMARY JUDGMENT HEARING DATE; CORRESPONDENCE TO CLIENT [REDACTED] [REDACTED] REVIEW CORRESPONDENCE [REDACTED]; RESPOND RE TIMING AND ISSUES OF SUMMARY JUDGMENT.	0.40 Hrs	\$185/hr	\$74.00
02/13/07 SRS	REVIEW CORRESPONDENCE FROM CLIENT [REDACTED]; [REDACTED]; REVIEW AMENDED MOTION; REVIEW MOTION FOR RECONSIDERATION; REVIEW STATUTORY LANGUAGE ARGUED BY CARROLL; WORK ON ANALYSIS OF SAME; TELEPHONE CONFERENCE [REDACTED] [REDACTED] [REDACTED]	1.10 Hrs	\$185/hr	\$203.50
02/20/07 SRS	WORK ON SUMMARY JUDGMENT HEARING PREP AND SERVICING AGREEMENT RELATED TO PROSPECTUS AT ISSUE.	0.40 Hrs	\$185/hr	\$74.00
02/21/07 SRS	REVIEW RULE 56F CASES AND BURDEN UPON CARROLL RE SAME; REVIEW IDAHO COLLECTION ACT; PREPARE FOR HEARING RE MOTION FOR SUMMARY JUDGMENT AND OPPOSITION TO MOTION TO CONTINUE HEARING PURSUANT TO RULE 56F AND OPPOSITION TO MOTION FOR RECONSIDERATION; TELEPHONE CONFERENCE WITH COURT CLERK RE CHANGED HEARING DATE AND ISSUES RE SAME; SECOND TELEPHONE CONFERENCE WITH COURT CLERK RE SAME; CORRESPONDENCE WITH CLIENT [REDACTED] WORK ON STRATEGY OF RESPONSE BRIEF; WORK ON SAME; TELEPHONE CONFERENCE [REDACTED]	4.60 Hrs	\$185/hr	\$851.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

[REDACTED] TELEPHONE  
CONFERENCE WITH COURT CLERK RE  
HEARING DATE FOR MOTION TO  
CONTINUE TRIAL; WORK ON SAME.

02/22/07 SRS	DRAFT OPPOSITION TO AMENDED MOTION TO CONTINUE; CORRESPONDENCE TO CLIENT [REDACTED]; FINALIZE AND FILE SAME.	1.50 Hrs	\$185/hr	\$277.50
02/23/07 KROY	WORK ON MOTION TO CONTINUE TRIAL; NOTICE OF HEARING; REVIEW AND REVISE SAME.	1.60 Hrs	\$105/hr	\$168.00
02/26/07 SRS	REVIEW NEW DISCOVERY PROPOUNDED BY CARROLL; REVIEW DISCOVERY DEADLINE; CORRESPONDENCE TO CLIENT [REDACTED] [REDACTED]	0.40 Hrs	\$185/hr	\$74.00
02/27/07 SRS	CORRESPONDENCE FROM [REDACTED] [REDACTED] TELEPHONE CONFERENCE [REDACTED] [REDACTED] WORK ON ISSUES RE SAME.	0.40 Hrs	\$185/hr	\$74.00
02/28/07 KROY	CONFERENCE WITH COUNSEL; DRAFT NOTICE OF TAKING DEPOSITION OF D. CAPPS AND M. CARROLL; DRAFT SUBPOENA FOR TAKING DEPOSITION OF D. CAPPS; TELEPHONE CONFERENCE WITH COURT REPORTER RE SCHEDULING DEPOSITION.	1.70 Hrs	\$105/hr	\$178.50

Total Legal Services: 18.70 Hrs \$3,195.50

Legal Services Summary

SHEILA R. SCHWAGER	15.40 hours at	\$185.00 =	\$2,849.00
KATHY N. ROYSTER	3.30 hours at	\$105.00 =	\$346.50

Client Charges

COPYING	-	663 copies	\$66.30
LONG DISTANCE			\$11.28

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

POSTAGE	\$5.70
DOMESTIC TELECOPY	\$1.13
CLIENT CHARGES	
02/09/07 CLIENT CHARGES - REFUND FOR POSTAGE	(9.25)
	\$(9.25)
OVERNIGHT DELIVERY	
02/05/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMEN TO IDAHO COUNTY ON 1/18/07	26.98
02/12/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO MIRIAM CARROLL ON 1/30/07	15.92
02/23/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO IDAHO COUNTY ON 2/6/07	26.31
02/23/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO MIRIAM CARROLL ON 2/6/07	26.31
	\$95.52
Total Client Charges	\$170.68
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TOTAL THIS BILL	\$3,366.18

Previous Bills Outstanding

12/11/06	187709	\$1818.16
01/09/07	188572	\$4583.26
02/08/07	189499	\$8511.03

TOTAL AMOUNT DUE

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\$18,278 63

CITI CORP

3800 CITIBANK CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Apr 10, 2007  
INVOICE NO.: 191344  
FILE NO.: 41834-0007  
BJD: 82-0259668

For Professional Services Rendered Through Mar 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services

Atty	Description	Hours	Rate	Amount
03/01/07 SRS	TELEPHONE CONFERENCE WITH G. FITZMAURICE IN GRANGEVILLE RE DEPOSITION LOCATION	0.20 Hrs	\$185/hr	\$37.00
03/01/07 KROY	CORRESPOND WITH COURT REPORTER RE: SCHEDULING DEPOSITIONS; TELEPHONE CONFERENCES WITH M&M COURT REPORTING; TELEPHONE CONFERENCE WITH CLEARWATER REPORTING RE SCHEDULING; REVIEW AND REVISE NOTICES OF TAKING DEPOSITION; SUBPOENA FOR TAKING DEPOSITION.	1.80 Hrs	\$105/hr	\$189.00
03/02/07 SRS	DRAFT LETTER TO CARROLL RE DEPOSITION DATE AND MOTION TO CONTINUE TRIAL; FINALIZE MOTION TO CONTINUE TRIAL AND NOTICE OF HEARING DATE; FINALIZE AND FILE DEPOSITION NOTICE AND SUBPOENA AND WORK ON SERVICE ISSUES RE SAME.	0.80 Hrs	\$185/hr	\$148.00
03/02/07 KROY	TELEPHONE CONFERENCE WITH COURT REPORTER; FINALIZE NOTICES FOR TAKING DEPOSITION; SUBPOENA FOR TAKING DEPOSITION; CALCULATE WITNESS FEES/MILEAGE.	0.50 Hrs	\$105/hr	\$52.50
03/05/07 SRS	TELEPHONE CONFERENCE WITH FROM D. CAPPS RE EXTENSION OF DEPOSITION DATES AND AVAILABLE DATES RE	0.10 Hrs	\$185/hr	\$18.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

SAME; WORK ON ISSUES RE SAME.

03/06/07 SRS	DRAFT LETTER TO D. CAPPS AND M. CARROLL RE CONTINUED DEPOSITION DATE BY AGREEMENT; DRAFT CONTINUED NOTICE OF DEPOSITIONS FOR D CAPPS AND M. CARROLL; CORRESPONDENCE WITH G. FITZMAURICE RE DEPOSITION SCHEDULING; FINALIZE AND FORWARD CORRESPONDENCE TO M. CARROLL AND D. CAPPS	0.50 Hrs	\$185/hr	\$92.50
03/06/07 KROY	REVIEW CORRESPONDENCE; TELEPHONE CONFERENCE WITH COURT REPORTER TO CHANGE DATE OF DEPOSITION; E-MAIL TO COURT REPORTER.	0.30 Hrs	\$105/hr	\$31.50
03/08/07 SRS	REVIEW DEFENDANT'S ANSWERS TO INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS RE EXPERT WITNESSES; REVIEW AFFIDAVIT PRODUCED RE SAME.	0.20 Hrs	\$185/hr	\$37.00
03/14/07 SRS	REVIEW NEW MOTION TO CONTINUE SUMMARY JUDGMENT HEARING AND COMPARE TO PRIOR MOTION; REVIEW OUTSTANDING DISCOVERY REQUESTS AND WORK ON STRATEGY ON HOW TO RESPOND.	0.40 Hrs	\$185/hr	\$74.00
03/15/07 SRS	DRAFT OPPOSITION TO MOTION TO CONTINUE HEARING; CORRESPONDENCE [REDACTED] REVIEW MOTION TO CONTINUE DISCOVERY DEADLINE; CORRESPONDENCE [REDACTED] [REDACTED] TELEPHONE CONFERENCE [REDACTED] [REDACTED]; FINALIZE AND FILE OPPOSITION TO MOTION TO CONTINUE HEARING.	1.50 Hrs	\$185/hr	\$277.50
03/21/07 SRS	DRAFT DISCOVERY OBJECTIONS IN REGARD TO RESPONSES TO FOURTH SET OF INTERROGATORIES,	0.90 Hrs	\$185/hr	\$166.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

ADMISSIONS, AND DOCUMENTS  
REQUESTS; TELEPHONE CONFERENCE  
WITH COURT CLERK RE CONTINUANCE  
OF HEARING RE MOTION TO CONTINUE  
TRIAL.

03/22/07 SRS	TELEPHONE CONFERENCE WITH COURT CLERK RE CHANGE IN HEARING DATE; CORRESPONDENCE TO CLIENT ██████████	0.20 Hrs	\$185/hr	\$37.00
03/26/07 SRS	FINALIZE AND SERVE OBJECTIONS TO FOURTH DISCOVERY REQUESTS.	0.30 Hrs	\$185/hr	\$55.50
03/29/07 SRS	WORK ON OCC REGULATIONS ARGUMENT AND ISSUES; PREPARE FOR HEARING FOR MOTION FOR SUMMARY JUDGMENT, FOR OPPOSITION TO RULE 56F MOTION, FOR MOTION TO CONTINUE TRIAL, AND OPPOSITION TO DISCOVERY MOTIONS AND MOTION TO RECONSIDER JUDICIAL NOTICE ORDER; TRAVEL TO AND FROM GRANGEVILLE (8 HOURS BILLED AT REDUCED TIME AT 4 HOURS); ATTEND HEARINGS; TELEPHONE CALL AND CORRESPONDENCE ██████████	7.50 Hrs	\$185/hr	\$1,387.50
03/29/07 LMES	RESEARCH OFFICE OF COMPTROLLER OF CURRENCY AND BANK REGULATION OF COLLECTION AND ASSET SECURITIZATION.	2.30 Hrs	\$135/hr	\$310.50
03/30/07 SRS	WORK ON CALCULATION OF DEADLINES; CORRESPONDENCE TO CLIENT ██████████ CORRESPONDENCE TO GRANGEVILLE COUNSEL RE VACATION OF DEPOSITIONS; CORRESPONDENCE TO CARROLL AND CAPPS RE SAME.	0.40 Hrs	\$185/hr	\$74.00
Total Legal Services:		17.90 Hrs		\$2,988.50

Legal Services Summary

SHEILA R. SCHWAGER	13.00 hours at	\$185.00 =	\$2,405.00
LOREN MESSERLY	2.30 hours at	\$135.00 =	\$310.50
KATHY N. ROYSTER	2.60 hours at	\$105.00 =	\$273.00

Client Charges

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

COPYING	- 144 copies	\$14.40
LONG DISTANCE		\$(4.47)
POSTAGE		\$11.10
DOMESTIC TELECOPY		\$0.60
CLIENT CHARGES		
03/02/07	CLIENT CHARGES - DAVID F. CAPPS WITNESS FEE AND MILEAGE	40.40
03/12/07	CLIENT CHARGES - GEM STATE INVESTIGATIONS & SECURITY FEE FOR PROCESS SERVING	122.00
03/30/07	CLIENT CHARGES - SHEILA R SCHWAGER REIMBURSEMENT FOR TRAVEL FROM BOISE TO GRANGEVILLE 386 MILES @ .485 PER MILE	187.21
		\$349.61
Total Client Charges		\$371.24
TOTAL THIS BILL		\$3,359.74

Previous Bills Outstanding

01/09/07	188572	\$4583.26
02/08/07	189499	\$8511.03
03/07/07	190434	\$3366.18

TOTAL AMOUNT DUE

=====  
\$19,820.21



CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: May 7, 2007  
INVOICE NO.: 192267  
FILE NO : 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through Apr 30, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services

Atty	Description	Hours	Rate	Amount
02/20/07 KROY	CONFERENCE WITH COUNSEL; SEARCH SEC, CITI AND INTERNET FOR SPECIFIC POOLING AND SERVICING AGREEMENT.	2.20 Hrs	\$105/hr	\$231.00
04/01/07 SRS	REVIEW JUDGE BRADBURY'S RECENT DECISION DISMISSING CASE UNDER IDAHO COLLECTIONS ACT STATUTE; WORK ON ISSUES RE SAME; DRAFT ORDER VACATING TRIAL DATE, CONTINUING SUMMARY JUDGMENT, AND GRANTING LIMITED DISCOVERY; CORRESPONDENCE TO CLIENT	0.60 Hrs	\$185/hr	\$111.00
04/03/07 KROY	TELEPHONE CONFERENCE WITH COURT REPORTER TO CANCEL DEPOSITIONS.	0.20 Hrs	\$105/hr	\$21.00
04/25/07 SRS	CORRESPONDENCE	0.20 Hrs	\$185/hr	\$37.00
Total Legal Services:		3.20 Hrs		\$400.00

Legal Services Summary

SHEILA R SCHWAGER	0.80 hours at	\$185.00 =	\$148 00
KATHY N. ROYSTER	2.40 hours at	\$105.00 =	\$252 00

Client Charges

COPYING	-	1 copies	\$0.10
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CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Jun 8, 2007  
INVOICE NO.: 193156  
FILE NO.: 41834-0007  
EID: 82-0259668

For Professional Services Rendered Through May 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE

Legal Services

Atty	Description	Hours	Rate	Amount
04/03/07 LMES	RESEARCH RE MEANING OF REGULATED LENDER FOR BRIEF TO JUDGE ABOUT INAPPLICABILITY OF PERMIT REQUIREMENTS IN IDAHO COLLECTION ACTIONS; RESEARCH PREEMPTION DOCTRINE FOR NATIONAL BANKS.	2.10 Hrs	\$135/hr	\$283.50
04/06/07 LMES	FINALIZE RESEARCH ON NATIONAL BANK AND PREEMPTION.	0.90 Hrs	\$135/hr	\$121.50
05/07/07 SRS	REVIEW CORRESPONDENCE AND INFORMATION [REDACTED] [REDACTED] WORK ON SECURITIZATION ISSUES AND ANALYSIS OF SAME; REPLY CORRESPONDENCE [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.70 Hrs	\$185/hr	\$129.50
05/08/07 SRS	REVIEW PROSPECTUS SUPPLEMENT TO OBTAIN ARGUMENTS AS TO WHY IDAHO COLLECTION ACT IS NOT APPLICABLE TO CITIBANK; REVIEW CITIGROUP WEBSITE RE SAME; WORK ON REVIEW OF THE IDAHO COLLECTION ACT AND ARGUMENTS AS TO WHY THE ACT IS NOT APPLICABLE TO CITIBANK; TELEPHONE CALL TO [REDACTED] CORRESPONDENCE [REDACTED]	1.50 Hrs	\$185/hr	\$277.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

05/10/07 SRS	REVIEW CORRESPONDENCE [REDACTED] [REDACTED] REVIEW WEBSITE AND DOCUMENTS RE SAME; EXTENSIVE TELEPHONE CONFERENCE [REDACTED] [REDACTED] [REDACTED] WORK ON SAME.	1.80 Hrs	\$185/hr	\$333.00
05/12/07 SRS	REVIEW COURT'S ORDER RE SUPPLEMENTAL BRIEFING ON STANDING ARGUMENT AND IDAHO COLLECTION ACT; REVIEW IDAHO COLLECTION ACT; REVIEW SECURITIZATION AND STANDING BRIEFING [REDACTED] [REDACTED]; REVIEW DOCUMENTS RELATED TO STANDING AND SECURITIZATION ANALYSIS; WORK ON ANALYSIS OF AND EXPLANATION OF SECURITIZATION PROCESS FOR SUPPLEMENTAL BRIEFING.	1.90 Hrs	\$185/hr	\$351.50
05/14/07 SRS	REVIEW POOLING AND SERVICE AGREEMENT, AMENDMENTS, CCCIT MONTHLY FORM, AND INDENTURE AGREEMENT FOR DOCUMENT PRODUCTION AND FOR SECURITIZATION/STANDING BRIEF; WORK ON AUTHORITY CITES FOR SECURITIZATION/STANDING ARGUMENT OF BRIEF; WORK ON SAME; CORRESPONDENCE [REDACTED] [REDACTED]	4.90 Hrs	\$185/hr	\$906.50
05/15/07 SRS	REVIEW DRAFT SECURITIZATION BRIEF [REDACTED] TELEPHONE CONFERENCE [REDACTED] [REDACTED]; WORK ON REVISIONS TO SECURITIZATION BRIEF; CORRESPONDENCE [REDACTED] [REDACTED] REVIEW ADDITIONAL CHANGES [REDACTED]; WORK ON CITES TO 2007 PROSPECTUS; ADDITIONAL REVISIONS TO SECURITIZATION BRIEF; CORRESPONDENCE [REDACTED] [REDACTED]	6.50 Hrs	\$185/hr	\$1,202.50
05/16/07 SRS	REVIEW ADDITIONAL REVISIONS TO BRIEF [REDACTED] TELEPHONE CONFERENCE [REDACTED]	0.60 Hrs	\$185/hr	\$111.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

REVISE AND FINALIZE SAME;  
CORRESPONDENCE [REDACTED]  
[REDACTED]

05/18/07 LMES	RESEARCH NATIONAL BANKS AND THEIR PROTECTION FROM STATE LAW, PARTICULARLY THE MOST RECENT SUPREME COURT CASE.	1.10 Hrs	\$135/hr	\$148.50
05/19/07 LMES	DRAFT SECTION OF SUPPLEMENTAL BRIEF DEALING WITH NATIONAL BANKING ACT PREEMPTION OF IDAHO COLLECTION ACT STATUTE AND THEN ALSO SHOWING THAT THE IDAHO STATUTE HAS AN EXPRESS EXEMPTION OF NATIONAL BANKS.	2.10 Hrs	\$135/hr	\$283.50
05/21/07 SRS	WORK ON ANALYSIS OF RESEARCH RE PRE-EMPTION, SECURITIZATION FACTS, AND IDAHO COLLECTION AGENCIES ACT FOR SUPPLEMENTAL BRIEF.	1.30 Hrs	\$185/hr	\$240.50
05/22/07 SRS	REVIEW NATIONAL BANK ACT AND OCC REGS RE SECURITIZATION AND COLLECTION/SERVICING ACTS FOR PREEMPTION ARGUMENT; REVISE SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT RE PREEMPTION ARGUMENT AND REGULATED LENDER EXCEPTION TO ICAA; REVIEW IDAHO CASE AUTHORITY RE PURPOSE OF ICAA; REVISE SUPPLEMENTAL BRIEF; CORRESPONDENCE [REDACTED] [REDACTED] WORK ON EXHIBITS AND MARKING SAME FOR SUBMISSION WITH SUPPLEMENTAL BRIEF.	5.20 Hrs	\$185/hr	\$962.00
05/22/07 LMES	RESEARCH RE SECURITIZATION OR SERVICING AGENT AND NATIONAL BANKS.	0.60 Hrs	\$135/hr	\$81.00
05/23/07 SRS	EXTENSIVE TELEPHONE CONFERENCE [REDACTED] [REDACTED]	3.40 Hrs	\$185/hr	\$629.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

[REDACTED]; WORK ON  
ADDITIONAL EXHIBITS FOR SUPER  
MAJORITY CITE; REVISE  
SUPPLEMENTAL BRIEF AND REDLINE  
SAME; CORRESPONDENCE [REDACTED]  
[REDACTED]

05/25/07 SRS	TELEPHONE CONFERENCE [REDACTED] [REDACTED] [REDACTED] REVIEW REVISED BRIEF; WORK ON ADDITIONAL REVISIONS; SEVERAL TELEPHONE CONFERENCES [REDACTED] [REDACTED] REDLINE SAME; FORWARD SAME; REVIEW ADDITIONAL REVISIONS; FINALIZE AND FILE SAME	4.50 Hrs	\$185/hr	\$832.50
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05/25/07 IMES	DRAFT RESPONSE TO 5TH SET OF DISCOVERY REQUESTS.	0.90 Hrs	\$135/hr	\$121.50
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Total Legal Services:		40.00 Hrs		\$7,015.00
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Legal Services Summary

SHEILA R SCHWAGER  
LOREN MESSERLY

32 30 hours at	\$185.00 =	\$5,975.50
7 70 hours at	\$135.00 =	\$1,039.50

Client Charges

COPYING	1,042 copies	\$104.20
COLOR COPIES		\$12.00

Total Client Charges		\$116.20
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CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Jul 31, 2007  
INVOICE NO.: 194173  
FILE NO.: 41834-0007  
BIN: 82-0259668

For Professional Services Rendered Through Jun 30, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
06/10/07 SRS	REVISE AND FINALIZE PLAINTIFF'S RESPONSES TO DEFENDANT'S FIFTH SET OF INTERROGATORIES, DOCUMENT REQUESTS, AND ADMISSIONS; CORRESPONDENCE TO CLIENT	0.40 Hrs	\$185/hr	\$74.00
06/12/07 SRS	FINALIZE AND FILE DISCOVERY RESPONSES.	0.20 Hrs	\$185/hr	\$37.00
06/25/07 SRS	REVIEW NOTICE OF HEARING FOR ORDER TO SHOW CAUSE; TELEPHONE CONFERENCE WITH COURT CLERK RE SAME; CORRESPONDENCE AND TELEPHONE CONFERENCE	0.30 Hrs	\$185/hr	\$55.50
06/25/07 LMES	TELEPHONE CALL TO M. CARROLL; LEAVE MESSAGE RE OUR NEED FOR A COPY OF THE MOTION REQUESTING ORDER TO SHOW CAUSE.	0.10 Hrs	\$135/hr	\$13.50
06/26/07 LMES	REVIEW MOTION TO SHOW CAUSE; DRAFT OF RESPONSE TO MOTION FOR SHOW CAUSE HEARING	0.70 Hrs	\$135/hr	\$94.50
06/27/07 LMES	CONTINUE DRAFT OF REPLY TO MOTION FOR SHOW CAUSE; REVIEW PLEADINGS, PRIOR COURT ORDER, PRIOR SUPPLEMENTAL BRIEFING.	0.70 Hrs	\$135/hr	\$94.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

06/28/07  
LMES FINISH INITIAL DRAFT OF RESPONSE 1 80 Hrs \$135/hr \$243.00  
TO MOTION FOR SHOW CAUSE.

Total Legal Services: 4 20 Hrs \$612.00

Legal Services Summary

SHELLA R. SCHWAGER 0.90 hours at \$185.00 = \$166.50  
LOREN MESSERLY 3.30 hours at \$135.00 = \$445.50

Client Charges

COPYING - 64 copies \$6.40

LONG DISTANCE \$0.13

POSTAGE \$3.03

OVERNIGHT DELIVERY

06/07/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS 29.76

CORPORATION SHIPMENT TO MIRIAM CARROLL ON  
5/25/07

06/07/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS 27.35

CORPORATION SHIPMENT TO IDAHO COUNTY ON  
5/25/07

\$57.11

Total Client Charges \$66.67

TOTAL THIS BILL \$678.67

Previous Bills Outstanding

06/08/07 193156 \$7131.20

TOTAL AMOUNT DUE

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\$7,809.87

CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Aug 10, 2007  
INVOICE NO.: 195384  
FILE NO.: 41834-0007  
EIN: 82-0259668

For Professional Services Rendered Through Jul 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services  
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Atty	Description	Hours	Rate	Amount
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07/02/07 SRS	REVIEW MOTION FOR ORDER TO SHOW CAUSE AND SUPPLEMENT MOTION IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; REVIEW COURT'S ORDER; WORK ON REVISIONS TO REPLY AND OBJECTION TO MOTION FOR ORDER TO SHOW CAUSE.	0.50 Hrs	\$185/hr	\$92.50
07/03/07 SRS	WORK ON BRIEF IN RESPONSE TO ORDER TO SHOW CAUSE; REVIEW OPPOSITION BRIEF TO SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT; TELEPHONE CONFERENCE [REDACTED]; WORK ON ISSUES OF TIMING OF REPLY BRIEF; TELEPHONE CONFERENCE WITH [REDACTED]; [REDACTED], CORRESPONDENCE WITH G. FITZMAURICE RE OBTAINING DOCKET INFORMATION; TELEPHONE CONFERENCE WITH COURT CLERK RE EXTENSION FOR FILING REPLY BRIEF; CORRESPONDENCE WITH [REDACTED]; WORK ON SAME.	1.90 Hrs	\$185/hr	\$351.50
07/03/07 LMES	TELEPHONE CALL TO DEFENDANTS REQUESTING EXTENSION TO FILE SUPPLEMENTAL RESPONSE BRIEFING, LEAVE MESSAGE; DRAFT MOTION FOR EXTENSION OF TIME TO FILE BRIEF PLUS ORDER TO SUBMIT TO COURT.	1.60 Hrs	\$135/hr	\$216.00



CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

07/04/07

SRS

REVIEW DOCKET INFORMATION RE  
PENDING ACTIONS WITH CARROLL;  
CORRESPONDENCE TO CLIENT ██████████  
REVISE AND FINALIZE OPPOSITION TO  
MOTION FOR ORDER TO SHOW CAUSE;  
CORRESPONDENCE TO CLIENT ██████████  
REVISE AND FINALIZE MOTION AND  
ORDER FOR EXTENSION OF BRIEFING  
SCHEDULE; DRAFT LETTER TO COURT  
CLERK RE SAME; CORRESPONDENCE TO  
CLIENT ██████████; REVIEW AND OBTAIN  
OCC DOCUMENTS ██████████  
██████████, OBTAIN BRADBURY DECISION  
FOR CALIFORNIA COUNSEL.

3.50 Hrs \$185/hr \$647.50

07/05/07

PVC

REVIEW E-MAIL FROM COUNSEL RE  
COLLECTION AGENCY ACT ISSUE;  
REPLY WITH SUGGESTION TO GET  
AFFIDAVIT FROM IDOF; REVIEW  
REPLIES; ██████████  
██████████; RESEARCH FEDERAL LAW  
FOR PREEMPTION STATUS ON  
COLLECTION ACTIVITIES OF NATIONAL  
BANKS; REVIEW IDAHO COLLECTION  
AGENCY ACT AND IDAHO CREDIT CODE  
TO PIECE TOGETHER THE EXEMPTION  
ARGUMENT; E-MAILS WITH COUNSEL;  
TELEPHONE CONFERENCE WITH G. GEE,  
DIRECTOR OF FINANCE, RE GETTING  
AN AFFIDAVIT THAT NATIONAL BANKS  
ARE EXEMPT FROM IDAHO COLLECTION  
AGENCY ACT; E-MAIL TO COUNSEL RE  
SAME.

1.50 Hrs \$225/hr \$337.50

07/05/07

SRS

REVIEW CORRESPONDENCES ██████████  
██████████ AND  
██████████;  
CORRESPONDENCE WITH P. COLLINS RE  
ISSUES  
REVIEW RESPONSE RE  
DEPARTMENT OF FINANCE AFFIDAVIT;  
TELEPHONE CONFERENCE ██████████  
██████████  
ACTION; CORRESPONDENCE TO J.  
WILSON RE SAME; CORRESPONDENCE TO  
██████████  
TELEPHONE CONFERENCE ██████████  
██████████  
██████████

1.30 Hrs \$185/hr \$240.50

WORK ON DEPARTMENT OF

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

FINANCE ISSUES

07/06/07 PVC	██████████	0.10 Hrs	\$225/hr	\$22.50
07/08/07 SRS	REVIEW IDAHO COLLECTION AGENCY ACT; REVIEW CARROLL'S MEMORANDUM ON THE IDAHO COLLECTION AGENCY ACT; DRAFT AFFIDAVIT OF DEPARTMENT OF FINANCE RE INAPPLICABILITY OF THE ICAA TO NATIONAL BANKS. "	1.10 Hrs	\$185/hr	\$203.50
07/09/07 PVC	REVIEW ██████████ REVIEW AND REVISE DRAFT AFFIDAVIT OF M. CARLSEN; E-MAILS WITH COUNSEL.	0.70 Hrs	\$225/hr	\$157.50
07/09/07 SRS	FINALIZE DEPARTMENT OF FINANCE AFFIDAVIT; CORRESPONDENCE ██████████ ██████████ WORK ON CONTINUATION OF HEARING ISSUES; CORRESPONDENCE TO CLIENT ██████████	0.50 Hrs	\$185/hr	\$92.50
07/09/07 LMES	TELEPHONE CALL TO COURT TO FIND OUT WHETHER OUR MOTION FOR EXTENSION WAS GRANTED AND ORDER SIGNED.	0.10 Hrs	\$135/hr	\$13.50
07/11/07 PVC	██████████, REVIEW REVISED AFFIDAVIT; TELEPHONE CONFERENCE WITH M. LARSEN, BUREAU CHIEF OF CONSUMER FINANCE BUREAU; E-MAIL TO M. LARSEN CONVEYING AFFIDAVIT; E-MAIL TO COUNSEL; REVIEW FURTHER ██████████	0.90 Hrs	\$225/hr	\$202.50
07/11/07 SRS	TELEPHONE CONFERENCE WITH AND CORRESPONDENCE WITH M. LARSON FROM DEPARTMENT OF FINANCE RE AFFIDAVIT; REVIEW SAME; REPLY CORRESPONDENCE RE ADDITIONS; REVIEW SAME; CORRESPONDENCE TO ██████████	0.50 Hrs	\$185/hr	\$92.50
07/12/07 PVC	REVIEW E-MAIL ██████████, REVIEW E-MAIL FROM COUNSEL; REVIEW E-MAIL FROM M. LARSEN; REVIEW	0.40 Hrs	\$225/hr	\$90.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

E-MAIL FROM COUNSEL RE JUDGE'S  
RULING ON MOTION TO COMPEL;  
E-MAIL [REDACTED]

07/12/07  
SRS

REVIEW CORRESPONDENCE [REDACTED] 2.30 Hrs \$185/hr \$425.50  
[REDACTED] CORRESPONDENCE TO M.  
LARSEN RE SAME; WORK ON  
PREPARATION FOR HEARING RE  
CARROLL'S DISCOVERY MOTION;  
ATTENDING HEARING RE CARROLL'S  
DISCOVERY MOTION; CORRESPONDENCE  
TO [REDACTED]  
CORRESPONDENCE TO CLIENT [REDACTED]  
[REDACTED]  
[REDACTED]  
TELEPHONE CONFERENCE [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] TELEPHONE CONFERENCE  
WITH [REDACTED]  
[REDACTED]

07/14/07  
SRS

DRAFT ORDER DENYING MOTION FOR  
ORDER TO SHOW CAUSE. 0.20 Hrs \$185/hr \$37.00

07/16/07  
LMES

CREATE APPENDIX, FIND ALL CITES  
FROM WESTLAW AND PRINT OFF FOR  
APPENDIX; FIX ALL CITES IN BRIEF  
TO REFER TO APPENDIX; MAKE FINAL  
REVISIONS TO BRIEF; FILE REPLY  
BRIEF 3.50 Hrs \$135/hr \$472.50

Total Legal Services:

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20.60 Hrs \$3,695.00

Legal Services Summary

PATRICK V. COLLINS 3.60 hours at \$225.00 = \$810.00  
SHEILA R. SCHWAGER 11.80 hours at \$185.00 = \$2,183.00  
LOREN MESSERLY 5.20 hours at \$135.00 = \$702.00

Client Charges

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COPYING - 516 copies \$51.60  
LONG DISTANCE \$0.67  
COMPUTER ASSISTED LEGAL RESEARCH \$49.68

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

POSTAGE \$14.08

OVERNIGHT DELIVERY

07/25/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO KATHY JOHNSON ON 7/5/07 16.50

07/27/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO IDAHO COUNTY ON 7/16/07 25.71

\$42.21

Total Client Charges \$158.24

TOTAL THIS BILL \$3,853.24

Previous Bills Outstanding

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06/08/07 193156 \$7131.20  
07/31/07 194173 \$678.67

TOTAL AMOUNT DUE \$11,663.11

CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Sep 11, 2007

INVOICE NO.: 196188

FILE NO.: 41834-0007

EIN: 82-0259668

For Professional Services Rendered Through Aug 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
08/13/07 SRS	REVIEW MOTION TO COMPEL DISCOVERY; CORRESPONDENCE TO CLIENT	0 20 Hrs	\$185/hr	\$37.00
08/15/07 PVC	TELEPHONE CONFERENCE WITH M. LARSEN RE THE FACT THAT DEBTOR WANTS TO TAKE HIS DEPOSITION; CONFERENCE WITH COUNSEL RE SAME; REVIEW	0 30 Hrs	\$225/hr	\$67 50
08/20/07 SRS	REVIEW DEPOSITION NOTICE; WORK ON ISSUES OF CONTINUANCE DUE TO TRIAL SCHEDULE.	0.20 Hrs	\$185/hr	\$37.00
08/20/07 LMES	TELEPHONE CALL TO CAPPS TO ARRANGE NEW DATE FOR DEPOSITION.	0.10 Hrs	\$135/hr	\$13.50
08/21/07 LMES	TELEPHONE CONFERENCES WITH CARROLL RE NEW DATE FOR DEPOSITION OF STATE EMPLOYEE; CONFERENCE WITH S. SCHWAGER RE SAME.	0.30 Hrs	\$135/hr	\$40.50
08/22/07 LMES	PHONE CONVERSATION WITH MR CAPPS RE DATE IN OCTOBER AND DEPONENT AVAILABILITY.	0.10 Hrs	\$135/hr	\$13.50
08/27/07 LMES	TELEPHONE CALL TO M. LARSEN; COMMUNICATE WITH DEBTORS RE ON-GOING EFFORTS TO CONTACT M.	0.20 Hrs	\$135/hr	\$27.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

LARSEN.

08/31/07

LMES	TELEPHONE CALL TO M LARSEN TO CONFIRM OCTOBER 5TH AS DEPOSITION DATE; CALL CAPPS AND LEAVE MESSAGE ABOUT DATE FOR DEPOSITION.	0.20 Hrs	\$135/hr	\$27.00
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Total Legal Services:	-----	1.60 Hrs	-----	\$263.00
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Legal Services Summary

PATRICK V. COLLINS	0.30 hours at	\$225.00 =	\$67 50
SHEILA R. SCHWAGER	0 40 hours at	\$185.00 =	\$74.00
LOREN MESSERLY	0.90 hours at	\$135.00 =	\$121 50

Client Charges

LONG DISTANCE	\$0 78
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Total Client Charges	-----	\$0 78
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TOTAL THIS BILL	-----	\$263.78
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Previous Bills Outstanding

06/08/07	193156	\$7131.20
08/10/07	195384	\$3853.24

TOTAL AMOUNT DUE	=====	\$11,248.22
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CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Oct 5, 2007  
INVOICE NO.: 197134  
FILE NO.: 41834-0007  
EIN: 82-0259668

For Professional Services Rendered Through Sep 30, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
09/04/07 LMES	TELEPHONE CALLS TO DEFENDANTS ABOUT MOVING DEPOSITION DATE; RECEIVE RESPONSE PHONE MESSAGE CONFIRMING OCTOBER 5; RELAY THE MESSAGE TO DEPONENT.	0.40 Hrs	\$135/hr	\$54.00
09/07/07 SRS	TELEPHONE CONFERENCE [REDACTED] [REDACTED] [REDACTED] [REDACTED] CORRESPONDENCE TO M. LARSON RE AMENDED DEPOSITION DATE AND SUBPOENA; OBTAIN SAME; CORRESPONDENCE TO CLIENT [REDACTED]	0.40 Hrs	\$185/hr	\$74.00
09/07/07 LMES	REVIEW SUBPOENA FROM DEBTORS AND COMPARE WITH IDAHO RULES ON SUBPOENAS AND E-MAIL S. SCHWAGER WITH SUMMARY OF SUFFICIENCY OF SUBPOENA	0.60 Hrs	\$135/hr	\$81.00
09/09/07 SRS	REVIEW STATUTES AND RULES RE PRO SE REPRESENTATION AND UNAUTHORIZED PRACTICE OF LAW; DRAFT CORRESPONDENCE TO D. CAPPS AND M. CARROLL RE SAME; WORK ON ISSUES RE SAME.	0.80 Hrs	\$185/hr	\$148.00
09/09/07 LMES	RESEARCH IDAHO LAW ON HUSBAND AND WIFE REPRESENTATION IN LITIGATION; DRAFT E-MAIL ANALYSIS	2.10 Hrs	\$135/hr	\$283.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

[REDACTED]  
[REDACTED] REVIEW STATUTE  
PROVIDED BY S. SCHWAGER RE  
HUSBAND AND WIFE LITIGATION.

09/10/07  
SRS CORRESPONDENCE WITH [REDACTED] 0.20 Hrs \$185/hr \$37.00  
[REDACTED]  
[REDACTED]

Total Legal Services: 4.50 Hrs \$677.50

Legal Services Summary

SHEILA R. SCHWAGER 1.40 hours at \$185.00 = \$259.00  
LOREN MESSERLY 3.10 hours at \$135.00 = \$418.50

Client Charges

LONG DISTANCE \$0.20  
POSTAGE \$1.31

Total Client Charges \$1.51

TOTAL THIS BILL \$679.01

Previous Bills Outstanding

06/08/07 193156 \$7131.20  
08/10/07 195384 \$3853.24  
09/11/07 196188 \$263.78

TOTAL AMOUNT DUE

=====  
\$11,927.23



CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Nov 8, 2007  
INVOICE NO.: 198381  
FILE NO.: 41834-0007  
EIN: 82-0259668

For Professional Services Rendered Through Oct 31, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
10/05/07 SRS	PREPARE FOR DEPARTMENT OF FINANCE DEPOSITION; TELEPHONE CONFERENCE WITH COUNSEL FOR DEPARTMENT OF FINANCE RE SAME; WORK ON REVIEW AND ANALYSIS OF CARROLL'S 44 PAGE REBUTTAL BRIEF RE APPLICATION OF ICAA; ATTEND DEPOSITION TAKEN BY CARROLL OF DEPARTMENT OF FINANCE; CORRESPONDENCE TO CLIENT [REDACTED]	3.30 Hrs	\$185/hr	\$610.50
10/05/07 LMES	SPEAK WITH ATTORNEY FOR DEPONENT RE TIME FOR THE DEPOSITION; WORK ON SAME; CONFERENCE WITH S SCHWAGER RE THE DEPOSITION RESULTS.	0.40 Hrs	\$135/hr	\$54.00
10/11/07 SRS	CORRESPONDENCES WITH [REDACTED]	0.30 Hrs	\$185/hr	\$55.50
10/14/07 SRS	WORK ON CONTINUED REVIEW OF DEBTOR'S 44 PAGE REBUTTAL BRIEF RE APPLICATION OF LICENSING REQUIREMENT TO NATIONAL BANKS UNDER IDAHO COLLECTION ACT; WORK ON REVIEW OF OCC DOCUMENT RE PERMISSIBLE ACTIVITIES BY NATIONAL BANKS; WORK ON REFUTING ARGUMENT RE SALE OF RECEIVABLES AND PROCEEDS OF SAME; WORK ON REFUTE RE STATE LAW APPLICABILITY DUE TO THE GBBA; CORRESPONDENCE	3.30 Hrs	\$185/hr	\$610.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

WITH [REDACTED]  
[REDACTED]

10/15/07 SRS	CORRESPONDENCE WITH CLIENT [REDACTED] [REDACTED] FINALIZE NOTICE RE SAME AND FORWARD [REDACTED] [REDACTED] WORK ON ORAL ARGUMENT AND RESPONSES TO ISSUES THAT WILL LIKELY BE RAISED BY JUDGE [REDACTED] [REDACTED] [REDACTED] [REDACTED]	4.60 Hrs	\$185/hr	\$851.00
10/15/07 LMES	RESEARCH RE FILING AN APPEAL IN IDAHO AND HOW TO EXPEDITE THE APPEAL AND HOW TO GET THE SUPREME COURT TO HEAR IT INSTEAD OF COURT OF APPEALS; RESEARCH INTERPRETIVE LETTERS FROM OCC; RESEARCH INTERPRETIVE LETTERS THAT REFERENCE GRAMM BLILEY ACT; CONTACT OCC BY PHONE AND E-MAIL RE MISSING INTERPRETIVE LETTERS.	4.10 Hrs	\$135/hr	\$553.50
10/16/07 PVC	REVIEW E-MAIL FROM COUNSEL RE ARGUMENT BEING MADE BY DEBTOR BASED ON LANGUAGE IN GRAMM LEACH BLILEY ACT; CONFERENCE WITH COUNSEL RE SAME; REVIEW GRAMM LEACH BLILEY ACT TO ATTEMPT TO LOCATE LANGUAGE CITED BY DEBTOR; ANALYZE "EFFECT ON STATE LAWS" PROVISIONS OF GRAMM LEACH BLILEY ACT; E-MAIL TO COUNSEL RE SAME; E-MAILS TO RESEARCH GROUP TO LOCATE CODIFICATION OF SECTION 104 OF GRAMM LEACH BLILEY ACT.	1.50 Hrs	\$225/hr	\$337.50
10/16/07 SRS	WORK ON ORAL ARGUMENT; RESEARCH RE GRAMM LEACH BILEY ACT AND ISSUES RAISED BY DEFENDANT; WORK ON RESPONSE TO ARGUMENTS MADE BY DEBTOR IN REBUTTAL BRIEF; REVIEW OCC OPINIONS RE GLBA AND PREEMPTION; REVIEW DEPOSITION TRANSCRIPT; FINALIZE NOTICE AND FILE SAME.	5.10 Hrs	\$185/hr	\$943.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

10/17/07 SRS	TELEPHONE CONFERENCE [REDACTED] [REDACTED] WORK ON ORAL ARGUMENT FOR HEARING RE INAPPLICABILITY OF ICAA AND STANDING; REVIEW DEPOSITION TRANSCRIPT; FINALIZE NOTICE; CORRESPONDENCE WITH [REDACTED] [REDACTED] FINALIZE AND FILE SAME; TELEPHONE CONFERENCE WITH COURT CLERK RE HEARING DATE CONTINUANCE; CORRESPONDENCE TO CLIENT [REDACTED]	4 10 Hrs	\$185/hr	\$758.50
10/31/07 SRS	PREPARE FOR HEARING RE WHETHER CITIBANK MUST BE LICENSED UNDER ICAA IN ORDER TO PROCEED WITH COLLECTION ACTION.	1 40 Hrs	\$185/hr	\$259.00

Total Legal Services:	----- 28 10 Hrs	----- \$5,033.50
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Legal Services Summary

PATRICK V. COLLINS	1 50 hours at	\$225 00 =	\$337 50
SHEILA R SCHWAGER	22.10 hours at	\$185 00 =	\$4,088.50
LOREN MESSERLY	4 50 hours at	\$135.00 =	\$607.50

Client Charges

----- COPYING	-	193 copies	\$19 30
LONG DISTANCE			\$1.16
COMPUTER ASSISTED LEGAL RESEARCH			\$216.20
POSTAGE			\$3.94

CLIENT CHARGES

10/30/07	CLIENT CHARGES - HEDRICK COURT REPORTING, INC ONE COPY OF THE DEPOSITION TRANSCRIPT OF MIKE LARSEN (CITIBANK V. CARROLL)	49.00
		\$49.00

Total Client Charges	\$289.60
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CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Dec 11, 2007  
INVOICE NO.: 199498  
FILE NO.: 41834-0007  
EIN: 82-0259668

For Professional Services Rendered Through Nov 30, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
11/01/07 SRS	PREPARE FOR HEARING RE: WHETHER CITIBANK MUST BE LICENSED UNDER THE ICAA; TRAVEL TO GRANGEVILLE FOR HEARING (1/2 TIME FOR TRAVEL TIME); ATTEND HEARING; CORRESPONDENCE AND TELEPHONE CALL TO CLIENT [REDACTED] TRAVEL FROM GRANGEVILLE TO BOISE.	8.30 Hrs	\$185/hr	\$1,535 50
11/01/07 LMES	RESEARCH OCC WEBSITE RE CONSUMER COMPLAINTS; SEND SUMMARY TO S. SCHWAGER.	0.50 Hrs	\$135/hr	\$67.50
11/13/07 SRS	REVIEW BRIEF FILED BY CARROLL; REVIEW CORRESPONDENCE FROM CLIENT; WORK ON TIMING ISSUES OF OBTAINING EXTENSION; TELEPHONE CONFERENCE WITH CLIENT [REDACTED] CORRESPONDENCE WITH CLIENT [REDACTED]	0.40 Hrs	\$185/hr	\$74.00
11/13/07 LMES	TELEPHONE CALL TO CLERK RE DEADLINE OF BRIEF ON TESTIMONY OF MICHAEL LARSON; DRAFT MOTION FOR EXTENSION OF TIME AND ORDER; CONFERENCE WITH S. SCHWAGER RE DEADLINE OF THE BRIEF.	0.90 Hrs	\$135/hr	\$121 50
11/14/07 SRS	FINALIZE MOTION AND ORDER EXTENDING TIME FOR FILING REPLY BRIEF..	0 40 Hrs	\$185/hr	\$74.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

11/14/07	LMES	TELEPHONE CONFERENCE WITH JUDGE'S CLERK RE OUR MOTION FOR NOVEMBER 20TH DEADLINE TO FILE OUR BRIEF.	0.20 Hrs	\$135/hr	\$27.00
11/19/07	LMES	REVIEW BRIEF; CONFORM DOCUMENT FROM CITIBANK FOR FILING WITH COURT.	0.40 Hrs	\$135/hr	\$54.00
11/27/07	SRS	REVIEW OPPOSITION BRIEF TO MOTION FOR SUMMARY JUDGMENT; CORRESPONDENCE TO [REDACTED] TELEPHONE CONFERENCE WITH [REDACTED] REVIEW CORRESPONDENCE RE SAME.	0.60 Hrs	\$185/hr	\$111.00
11/28/07	SRS	TELEPHONE CALL TO K. JOHNSON RE SUMMARY JUDGMENT BRIEFING ISSUES; CORRESPONDENCE TO [REDACTED]	0.10 Hrs	\$185/hr	\$18.50
Total Legal Services:			11.80 Hrs		\$2,083.00

Legal Services Summary

SHEILA R. SCHWAGER	9.80 hours at	\$185.00 =	\$1,813.00
LOREN MESSERLY	2.00 hours at	\$135.00 =	\$270.00

Client Charges

COPYING	-	30 copies	\$3.00
LONG DISTANCE			\$1.41
POSTAGE			\$5.15

CLIENT CHARGES

11/09/07	CLIENT CHARGES - SHEILA R SCHWAGER REIMBURSEMENT FOR ATTENDING HEARING IN GRANGEVILLE ON 11/1/07 (FOOD/BEV. \$6.35) (OTHER AMOUNTS \$192.06 - 396 MILES)	198.41
11/15/07	CLIENT CHARGES - KEITH M. EVANS HEARING TRANSCRIPT	188.50
		\$386.91
OVERNIGHT DELIVERY		
11/05/07	OVERNIGHT DELIVERY - FEDERAL EXPRESS CORPORATION SHIPMENT TO CLERK OF THE COURT ON 10/18/07	22.98

CITI CORP

3800 CITIGROUP CENTER A3-24  
TAMPA, FL 33610

INVOICE DATE: Dec 17, 2007  
INVOICE NO.: \*\*\*\*\*  
FILE NO.: 41834-0007  
EIN: 82-0259668

For Professional Services Rendered Through Dec 17, 2007  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services

Atty	Description	Hours	Rate	Amount
12/02/07 SRS	REVIEW MOTION AND MEMORANDUM TO DISMISS; CORRESPONDENCE TO CLIENT [REDACTED]	0.30 Hrs	\$185/hr	\$55.50
12/03/07 SRS	TELEPHONE CONFERENCE WITH [REDACTED] JOHNSON, JUDGE BRADEBURY'S CLERK, RE CARROLL'S RECENT FILINGS AND JUDGE'S INTENTIONS AS TO SUMMARY JUDGMENT DECISION; TELEPHONE CONFERENCE WITH [REDACTED]	0.40 Hrs	\$185/hr	\$74.00
12/04/07 SRS	TELEPHONE CALL FROM COURT CLERK RE BRIEFING; CORRESPONDENCE TO CLIENT [REDACTED]	0.20 Hrs	\$185/hr	\$37.00
12/14/07 SRS	REVIEW JUDGE'S DECISION GRANTING SUMMARY JUDGMENT; TELEPHONE CONFERENCE WITH [REDACTED], INTEREST AND ATTORNEY FEES; REVIEW SAME AND FORWARD AFFIDAVIT AS TO INTEREST; REVIEW COMPLAINT; CORRESPONDENCE WITH [REDACTED]; REVIEW AFFIDAVIT AND REVISE SAME; FINALIZE AFFIDAVIT; CORRESPONDENCE TO CLIENT [REDACTED]	1.20 Hrs	\$185/hr	\$222.00
12/17/07 LMBS	DRAFT MOTION FOR ENTRY OF JUDGMENT, APPLICATION FOR ATTORNEY FEES, MEMORANDUM OF	2.50 Hrs	\$135/hr	\$337.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

COSTS, NOTICE OF HEARING,  
PROPOSED JUDGMENT; REVIEW ENTIRE  
FILE; RESEARCH CASE LAW RE  
ATTORNEY FEES.

Total Legal Services:

-----  
4.60 Hrs

-----  
\$726.00

Legal Services Summary

SHEILA R. SCHWAGER  
LOREN MESSERLY

2.10 hours at \$185.00 =  
2.50 hours at \$135.00 =

\$388.50  
\$337.50

Client Charges  
-----

LONG DISTANCE

\$1.02

Total Client Charges

-----  
\$1.02

TOTAL THIS BILL

-----  
\$727.02

Previous Bills Outstanding  
-----

08/10/07	195384	\$15.48
11/08/07	198381	\$5323.10
12/11/07	199498	\$2502.45

TOTAL AMOUNT DUE

=====

DOCKETED

JAN 17 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Kathy Johnson* DEPUTY

Sheila R. Schwager ISB No. 5059  
Loren Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys For Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

RESPONSE TO DEFENDANT'S  
OBJECTIONS

Plaintiff, Citibank (South Dakota) N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby responds to the pleading filed by the Defendant on December 31, 2007, entitled "Objections." It is not clear whether the Defendant filed this pleading in support of her Motion for Reconsideration or in Opposition to Plaintiff's Motion for Entry of Final Judgment, or for any other purpose, but the pleading is without merit.



The Defendant contends that this Court has not ruled on certain Motions and therefore the Summary Judgment Order could not be entered. The Defendant's contention is not supported by law or fact.

1. The Motion for Show Cause Hearing was opposed by Citibank as set forth in its Reply and Opposition to Defendant's Motion for Show Cause Hearing filed on July 9, 2007, which came for hearing on July 12, 2007. At the hearing the Court denied the Defendant's Motion because Citibank had complied with the Order Vacating Trial Date, Continuing Summary Judgment Hearing, and Granting Limited Discovery entered on April 5, 2007.

2. In the Defendant's Motion to Compel Discovery dated August 8, 2007, she made the same arguments made in the Motion for Show Cause Hearing. It came for hearing on November 1, 2007, at the summary judgment hearing. The Motion was argued and opposed by Citibank. On December 10, 2007, this Court denied that motion in its Memorandum Decision and Order, in which this Court granted summary judgment to Citibank. Specifically, this Court referenced the Defendant's Motion to Compel on page 3 of the Decision and accepted Citibank's counter argument that discovery was not necessary because it was irrelevant whether or not Citibank is the owner of the receivables, since it is the owner of the Account. *Memorandum Decision, pp. 3-*

4. As held by this Court:

The receivables are separate from the account, and one can be transferred without the other. The record reflects that Ms. Carroll's account was retained by Citibank. As owner of the account, Citibank has standing to collect the debt owed to the account. It is of no moment that Citibank contractually obliged itself to transfer the money it collects on its accounts to the Master Trust.

*Memorandum Decision, p. 4.*

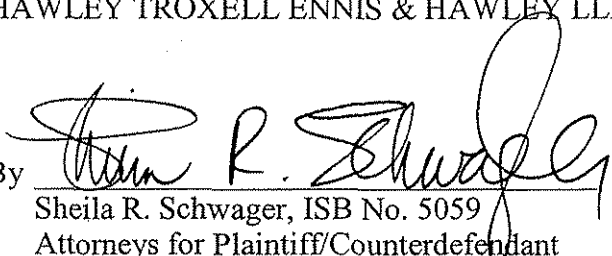
3. The arguments made by the Defendant in the Motion to Dismiss Due to Lack of Standing dated November 25, 2007, were the same arguments made in opposition to the Motion for Summary Judgment and were denied for the reasons set forth in this Court's Memorandum Decision and Order dated December 10, 2007, in which this Court granted summary judgment to Citibank.

Based upon the above and the record in this case, Citibank respectfully requests that the Defendant's Pleading entitled "Objections" be denied and that Citibank be awarded its attorney fees and costs for having to respond to the "Objections."

DATED THIS 16th day of January, 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By

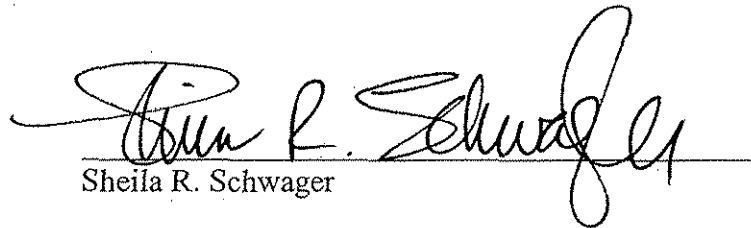
  
Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of January, 2008, I caused to be served a true copy of the foregoing RESPONSE TO DEFENDANT'S OBJECTIONS by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheila R. Schwager

Sheila R. Schwager ISB No. 5059  
 Loren Messerly ISB No. 7434  
 HAWLEY TROXELL ENNIS & HAWLEY LLP  
 877 Main Street, Suite 1000  
 P.O. Box 1617  
 Boise, ID 83701-1617  
 Telephone: (208) 344-6000  
 Facsimile: (208) 342-3829  
 Email: srs@hteh.com  
 lmes@hteh.com

DOCKETED

IDAHO COUNTY DISTRICT COURT  
 FILED  
 AT 5:00 O'CLOCK P.M.

JAN 17 2008

ROSE E. GEHRING  
 CLERK OF DISTRICT COURT  
 KATHY JOHNSON DEPUTY

Attorneys For Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
 STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A., )  
 )  
 Plaintiff/Counterdefendant, )  
 vs. )  
 )  
 MIRIAM G. CARROLL, )  
 )  
 Defendant/Counterclaimant. )

Case No. CV-2006-37067  
 PLAINTIFF'S REPLY AND  
 OPPOSITION TO DEFENDANT'S  
 MOTION FOR RECONSIDERATION

Plaintiff, Citibank (South Dakota), N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby submits this brief in reply and in opposition to the Defendant's Motion For Reconsideration. The Defendant's Motion contends that this Court erred in entering summary judgment against the Defendant by attempting to argue essentially the same points and issues previously raised and rejected by this Court in its well-reasoned Memorandum and Decision and Order entered on December 10, 2007 ("Summary Judgment Order"). The Defendant contends, with no new evidence, that this Court should reconsider its entry of the Summary Judgment Order, but ignores the facts and the record that the Court, after extensive briefing and several hearings, found that 1) Citibank is the real party in interest; 2) the Master Trust has no impact on the amount Defendant owes to Citibank; and 3)

PLAINTIFF'S REPLY AND OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION- 1

Citibank's evidence was competent and admissible to support summary judgment. This attempt to re-argue Citibank's standing, the amount Defendant owes Citibank and the admissibility of the evidence after summary judgment has been fully briefed, argued and granted should be rejected, as it is contrary to Rule 56 of the Idaho Rules of Civil Procedure. No new evidence has been presented to this Court and instead it is yet unfortunately another attempt by the Defendant to unnecessarily increase the costs, prolong the litigation, and attempt to avoid the entry of judgment. For the reasons set forth below, in Citibank's summary judgment pleadings, and in this Court's Summary Judgment Order, the Motion for Reconsideration should be denied.

### I. AS THIS COURT DETERMINED, CITIBANK HAS STANDING

Under Rule 56 of the Idaho Rules of Civil Procedure, the Defendant had the opportunity and did in fact argue that that Citibank did not have standing. This Court after extensive briefing and oral argument addressed this issue and found that the Defendant's contention that Citibank lacks standing because it transferred the receivables on her account to the Master Trust, was simply wrong. Specifically, this Court held that:

Nothing in the evidence suggests that Citibank transferred to the Master Trust anything more than the receivables on Ms. Carroll's account. . . The receivables are separate from the account, and one can be transferred without the other. The record reflects that Ms. Carroll's account was retained by Citibank. As owner of the account, Citibank has standing to collect the debt owed on the account. It is of no moment that Citibank contractually obligated itself to transfer the money it collects on its accounts to the Master Trust. Citibank's obligation to the Master Trust to transfer the money collected does not affect Ms. Carroll's contractual relationship with and obligation to Citibank. I therefore conclude that Citibank has standing to bring this suit to collect the credit card debt owed by Ms. Carroll on the account.

*Summary Judgment Order, pp. 4-5 (emphasis supplied).* The Defendant has presented no new evidence that Citibank is not the owner of the Account.<sup>1</sup> Instead, the Defendant merely reargues

---

<sup>1</sup> Even the Affidavit that the Defendant attaches to her Motion (which was not filed by Citibank in support of its Motion for Summary Judgment) declares that Citibank is the owner of the Account and is the party to whom the debt is owed.

Despite the filing of numerous briefs, at no time prior to the granting of summary judgment (of which she had nearly a year, from January 19, 2007 through December 10, 2007), did the Defendant object to the evidence submitted in support of Citibank's Motion for Summary Judgment. For this reason alone, the Defendant's after the fact objection should fail. In any event, the Defendant is wrong. The evidence submitted in support of the Motion for Summary Judgment is proper, admissible, and was duly relied upon by this Court.

Contrary to Defendant's arguments, the record and evidence reflect that 1) the agreement governing the Account was properly submitted and authenticated; 2) the affidavit submitted on behalf of Citibank did, in fact, properly attach true and correct copies of the Account statements, Account records and Citibank's business records; and 3) all of this evidence supported the conclusion that the Defendant incurred the obligation on the Account.<sup>4</sup>

Indeed, the Affidavit of Ms. Ryning and attached business records filed in support of the Motion for Summary Judgment are competent and admissible hearsay evidence pursuant to I.R.E. 803(6) and I.R.E.902(11). Ms. Ryning's affidavit sets forth the facts required under Rule 803(6) and Rule 902(11), under penalty of perjury, and the Defendant has submitted no competent evidence to the contrary. See I.R.E. 803(6); I.R.E. 902(11); *Large v. Cafferty Realty, Inc.*, 123 Idaho 676, 683 (1993).

Not only does Defendant's evidentiary arguments fail based on the abundant evidence establishing the existence, use, and non-payment of the Account by the Defendant, the Defendant *herself* admitted all of the facts necessary for the Court to grant summary judgment. Of course, these discovery responses and admissions are admissible evidence as the admission of a party opponent, I.R.E. 801(d)(2). The Defendant also admitted that she received the Account

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<sup>3</sup> *Id.*, See *Ryning Aff.* ¶¶ 1-10.

<sup>4</sup> See *Schwager Aff.*, *Ehx. 1*, *Defendant's Answers to Request for Admission Nos. 38, 40, 41-43, 45-52, 54-55, 57, 61*; *Ryning Aff.*, ¶¶ 1-10, *Exh. 2*.

statements at issue on or about the date reflected on each statement<sup>5</sup> and when she received those statements, she did not dispute any of the charges, credits, or payments.<sup>6</sup> Thus, by the Defendant's own admissions and discovery responses submitted in support of Citibank's Motion for Summary Judgment, the Summary Judgment Order is well supported by admissible evidence.

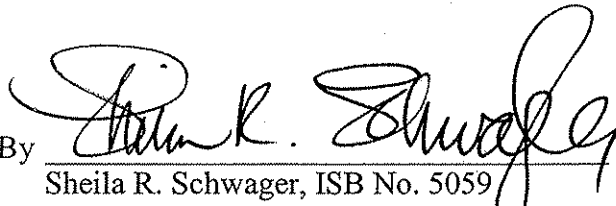
Thus, the Defendant is wrong in her contention that this Court's Summary Judgment Order is not supported by admissible evidence.

#### IV. CONCLUSION

In this case, through the extensive discovery propounded by both parties, it has been established beyond refute that the Defendant incurred the debt from her admitted use of the credit card issued by Citibank and that the Defendant failed to pay for that debt. There is no reason for this Court to reconsider its well reasoned Summary Judgment Order, the Defendant's Motion should be denied in its entirety, and Citibank should be awarded costs and attorney fees in having to defend the Motion.

DATED THIS 16th day of January, 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By   
Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

---

<sup>5</sup> Schwager Aff., Ehx. 2, Defendant's Answers to Admission Nos. 7, 13.

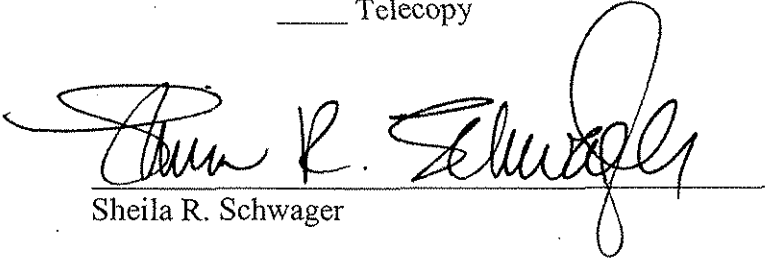
<sup>6</sup> Id.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of January, 2008, I caused to be served a true copy of the foregoing PLAINTIFF'S REPLY AND OPPOSITION TO DEFENDANT'S MOTION FOR RECONSIDERATION by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[pro se]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheila R. Schwager



DOCKETED

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 5:00 O'CLOCK P.M.

JAN 17 2008

ROSE E. GEMRING  
CLERK OF DISTRICT COURT  
DEPUTY

Sheila R. Schwager ISB No. 5059  
Loren Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys For Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A., )  
 )  
Plaintiff/Counterdefendant, )  
vs. )  
 )  
MIRIAM G. CARROLL, )  
 )  
Defendant/Counterclaimant. )

Case No. CV-2006-37067

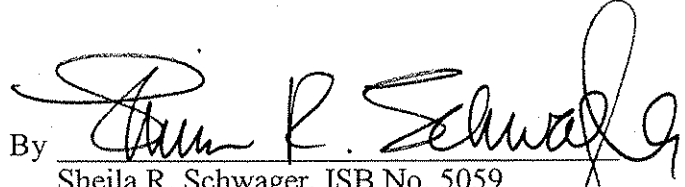
OBJECTION TO DEFENDANT'S  
MOTION TO CONTINUE HEARING  
ON FINAL JUDGMENT AND  
ENTRY OF JUDGMENT

Plaintiff, Citibank (South Dakota) N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby submits this Objection to Defendant's Motion to Continue Hearing on Final Judgment and Entry of Judgment. Citibank duly set its Motion For Entry of Judgment and provided notice of that Motion and all evidence in support of the Motion to the Defendant prior to the time period required under the Idaho Rules of Civil Procedure. The Defendant is available for the hearing date and in fact has noticed motions for

hearing for that same date. Thus, there is no cause under the Idaho Rules of Civil Procedure to continue Citibank's Motion for Entry of Judgment.

DATED THIS 16<sup>th</sup> day of January 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

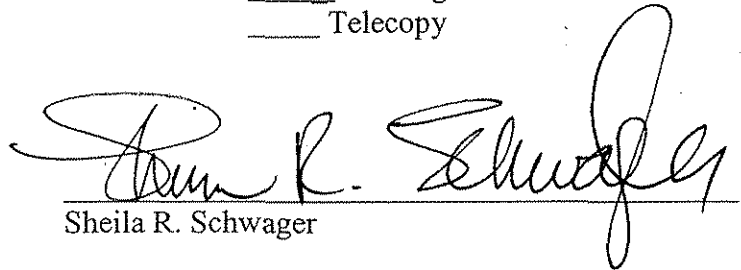
By   
Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of January 2008, I caused to be served a true copy of the foregoing OBJECTION TO DEFENDANT'S MOTION TO CONTINUE HEARING ON FINAL JUDGMENT AND ENTRY OF JUDGMENT by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheila R. Schwager

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 3:45 O'CLOCK P.M.

DOCKETED

JAN 22 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose E. Gehring*

Sheila R. Schwager, ISB No. 5059  
Loren K. Messerly, ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys for Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,	)	Case No. CV-2006-37067
Plaintiff/Counterdefendant,	)	
vs.	)	SUPPLEMENTAL AFFIDAVIT OF
MIRIAM G. CARROLL,	)	SHEILA R. SCHWAGER IN RESPONSE
Defendant/Counterclaimant.	)	TO OBJECTION FOR MOTION FOR
	)	ENTRY OF JUDGMENT AND
	)	REQUEST FOR ATTORNEY FEES AND
	)	COSTS

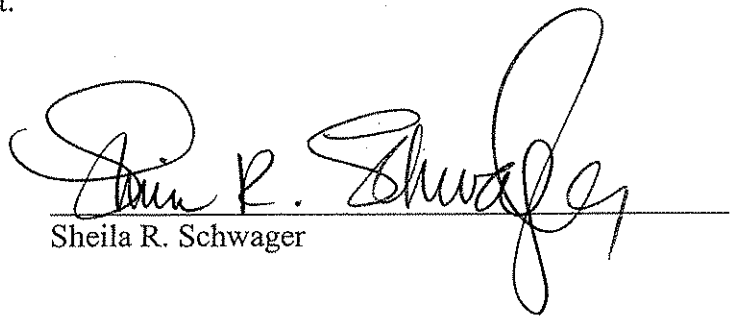
SHEILA R. SCHWAGER, being first duly sworn upon oath, deposes and states as follows:

1. I am a partner of the law firm of Hawley Troxell Ennis & Hawley LLP, counsel of record for Plaintiff/Counterdefendant Citibank (South Dakota) N.A. ("Citibank"), in the above-captioned case. I make this Supplemental Affidavit in response to Defendant's Objection for Motion for Entry of Judgment and Request for Attorney Fees and Costs.

SUPPLEMENTAL AFFIDAVIT OF SHEILA R. SCHWAGER IN  
RESPONSE TO OBJECTION FOR MOTION FOR ENTRY OF  
JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS -

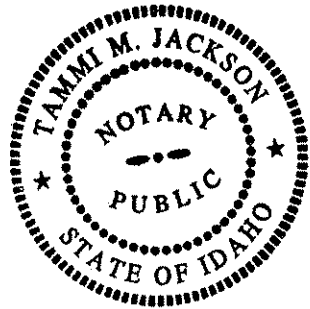
2. The Defendant argues after summary judgment has been entered, in violation of Rule 56 of the Idaho Rules of Civil Procedure, that certain evidence was insufficient to support summary judgment. As set forth in Citibank's responses, this contention is without merit. In addition, as set forth in the summary judgment pleadings and affidavits, the Defendant has made multiple admissions as to use of the Account and purchases on the Account. In fact, in the Defendant's Amended Answers to Plaintiff's Second Set of Requests for Admissions, Interrogatories, and Request for Production of Documents, served on October 12, 2006 ("Defendant's Amended Answers"), in Admissions Nos. 7 and 13, she admits that she received the monthly Account Statements (Exhibit 1 to the Second Set of Requests for Admissions) and she did not dispute any of the charges, credits, or payments when she received those statements. The Defendant's Amended Answers did not attach the specific Exhibit 1 that she references. Thus, to ensure the record is complete, attached hereto as Exhibit A is a true and correct copy of the Plaintiff's Second Set of Requests for Admission to Defendant served on July 10, 2006, which attaches the Exhibit 1 statements referenced in the Defendant's Amended Answers.

Further your affiant sayeth naught.

  
Sheila R. Schwager

STATE OF IDAHO            )  
  ) ss.  
County of Ada                )

SUBSCRIBED AND SWORN before me this 21st day of January, 2008.



*Tammi Jackson*

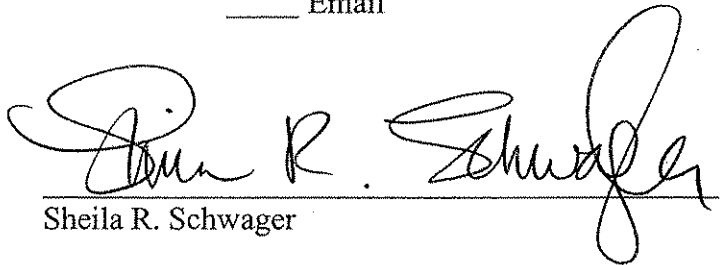
Name: Tammi Jackson  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 8/28/09

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January, 2008, I caused to be served a true copy of the foregoing SUPPLEMENTAL AFFIDAVIT OF SHEILA R. SCHWAGER IN RESPONSE TO OBJECTION FOR MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS by the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy  
 Email

  
\_\_\_\_\_  
Sheila R. Schwager

SUPPLEMENTAL AFFIDAVIT OF SHEILA R. SCHWAGER IN  
RESPONSE TO OBJECTION FOR MOTION FOR ENTRY OF  
JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS -

JEFFREY M. WILSON, ISB No.1615  
 WILSON & McCOLL  
 420 W. Washington  
 P.O. Box 1544  
 Boise, Idaho 83701  
 Telephone: 208-345-9151  
 Attorneys for Plaintiff

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF

THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,	)	
	)	
Plaintiff,	)	Case No. CV2006-37067
	)	
vs.	)	PLAINTIFF'S SECOND SET OF
	)	REQUESTS FOR ADMISSION
MIRIAM G CARROLL,	)	TO DEFENDANT
	)	
Defendant.	)	
_____	)	

COMES NOW the Plaintiff, pursuant to Rule 36 of the Idaho Rules of Civil Procedure, and requests that Defendant admit or deny, under oath and in writing, within fifteen (15) days after receipt of service, the following statements of fact:

**DEFINITIONS**

1. The terms "YOU" and "YOUR" refer to Miriam G. Carroll.
2. The term "BANK" refers to Citibank (South Dakota) N.A.
3. The term "BILLING ERROR DISPUTE LETTERS" refers to all "notice of billing error" letters which YOU rely upon in this action.
4. The term "ACCOUNT" refers to the credit card account(s) at issue in this action.
5. The term "CARD AGREEMENT" refers to the credit card agreement governing the terms and conditions of the ACCOUNT.



**REQUESTS FOR ADMISSIONS:**

**REQUEST FOR ADMISSION NO. 1:**

Admit that YOU opened the ACCOUNT with the BANK on or about April 1, 1999.

**REQUEST FOR ADMISSION NO. 2:**

Admit that when YOU opened the ACCOUNT, the BANK provided YOU with a CARD AGREEMENT.

**REQUEST FOR ADMISSION NO. 3:**

Admit that YOU purchased goods and/or services with the credit card for YOUR ACCOUNT pursuant to the CARD AGREEMENT.

**REQUEST FOR ADMISSION NO. 4:**

Admit that YOU failed to make all prescribed payments on YOUR ACCOUNT as they became due.

**REQUEST FOR ADMISSION NO. 5:**

Admit that YOU are indebted to the BANK in the amount of \$28,868.42 on the ACCOUNT pursuant to the CARD AGREEMENT.

**REQUEST FOR ADMISSION NO. 6:**

Admit that the BANK provided YOU with periodic billing statements for the sums owed to the BANK in connection with the ACCOUNT.

**REQUEST FOR ADMISSION NO. 7:**

Admit that at the time YOU received the periodic billing statements reflecting the sums owed on the ACCOUNT, YOU did not object to the BANK regarding the accuracy of any particular charges for any goods and/or services reflected on the periodic billing statements.

**REQUEST FOR ADMISSION NO. 8:**

Admit that the CARD AGREEMENT provides for the payment of court costs and reasonable attorneys' fees in the event of an action seeking to collect debts owing on the ACCOUNT.

**REQUEST FOR ADMISSION NO. 9:**

Admit that YOU have no valid claim in this ARBITRATION.

**REQUEST FOR ADMISSION NO. 10:**

Admit that the BILLING ERROR DISPUTE LETTERS do not comply with the notice requirements of the Truth in Lending Act, 15 U.S.C. Section 1601, et seq. ("TILA"), specifically Section 1666(a).

**REQUEST FOR ADMISSION NO. 11:**

Admit that the BILLING ERROR DISPUTE LETTERS do not comply with the notice requirements of TILA because they do not indicate the particular charge or amount that YOU are disputing.

**REQUEST FOR ADMISSION NO. 12:**

Admit that the BILLING ERROR DISPUTE LETTERS do not comply with the notice requirements of TILA because they were not timely filed.

**REQUEST FOR ADMISSION NO. 13:**

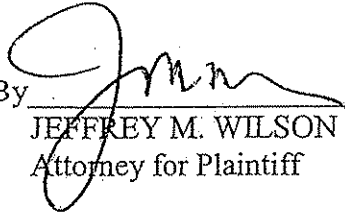
Admit that YOU received the statements attached as Exhibit 1 on or about the date reflected on each statement.

REQUEST FOR ADMISSION NO. 14:

Admit that YOU did not contact the BANK about the alleged non-receipt of initial disclosures prior to August 23, 2004.

DATED This 10 day of July, 2006.

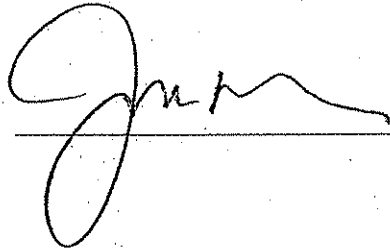
WILSON & McCOLL

By   
JEFFREY M. WILSON  
Attorney for Plaintiff

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 10 day of July, 2006, I mailed a true and correct copy of the foregoing PLAINTIFF'S SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT by regular United States mail with the correct postage affixed thereon addressed to:

Miriam G. Carroll  
HC11 Box 366  
Kamiah, ID 83536-9410

  
\_\_\_\_\_

FO-NV 00 AI 1 0499 VI 0000 VI 4 05/11/06 20:45:21

MIRIAM G CARROLL  
 25 BELLEVIEW ST  
 MOUNT CLEMENS  
 48043-2238

MI

CITIBANK  
 PO BOX 688911  
 DES MOINES, IA  
 USA 50368-8911

For Customer Service call or write

1-800-950-5114  
 BOX 6000  
 THE LAKES, NV  
 89163-6000

For billing inquiries write to  
 this address; calling will not  
 preserve your rights.

Citibank Platinum Select

Account Number  
 4128 0038 2845 7807  
 PAYMENT DUE DATE 06/11/99

Statement Date 05/17/99 Total Credit Line \$19600 Cash Advance Limit \$5000 New Balance \$ .00 Available Credit Line \$19600 Available Cash Line \$5000

Stat Dt	Post Dt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	SIC
	0517		MEMBERSHIP FEE MAY 99-APR 00	00		74 0000	0	700000000000
<p>If you have not received your new card, please call the Customer Service number on this statement.</p> <p>Our records show home phone 810-469-7900 and business phone 810-469-7900. Please update above coupon if incorrect.</p> <p>RING IN THE MILLENNIUM WITH \$1,000,000! You can also win a Gourmet Party for 50 or 0% APR all through the year 2000 in the MILLION DOLLAR DREAM SWEEPSTAKES. No purchase necessary to enter. Write PO Box 9163, Medford, NY 11763-9163 for complete rules.</p> <p>Visit us at <a href="http://www.citibank.com">www.citibank.com</a> for information on Citibank's cards, products and services.</p>								

Account Summary							Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due
Purchases								Adv Min Due
Advances								Amount OCT
Total								Fees
								Past Due
								Min Amt Due

Rate Summary	PURCHASES	ADVANCES
Number of days this Billing Period		
Balance subject to Finance Charge		
Periodic Rate	.04287%	.05476%
Nominal Annual Percentage Rate	15.650%	19.990%
Annual Percentage Rate	15.650%	19.990%

RECEIVED  
 MAY 25 2006

WILSON & MCCOLL

05/11/00

\$ .00

\$ .00

SITE:KC-CL TM:CO-5000 ACID:KCCJ

PAID DUE DATE

NEW

MIN AMT DUE

FO-NV

00 AI 2 0499 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number  
4128 0038 2845 7807  
PAYMENT DUE DATE 05/11/00

Statement Date    Total Credit Line    Cash Advance Limit    New Balance    Available Credit Line    Available Cash Line  
04/17/00            \$19600            \$5000            \$ .00            \$19600            \$5000

Sale Dt	Post Dt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
		0417	MEMBERSHIP FEE APR 00-MAR 01	00	74	0000	0	700000000000
<p>Get 3 months of optional Citibank Credit Protector FREE when you enroll today! Simply initial the box in the lower left-hand corner of your billing statement coupon. Remember to return the coupon with your payment.</p> <p>WELCOME to Sony Citibank Platinum Select cardmembership. We hope you will enjoy the benefits and rewards this program offers. Your card is accepted at over 16 million locations worldwide.</p> <p>CALL 1-800-444-1676 TO ACTIVATE YOUR CARD: You've already received your new Sony Citibank card in the mail. In order to use your card -- and enjoy its benefits -- you must call 1-800-444-1676. CALL TODAY!</p> <p>Start accumulating Sony Points immediately with every eligible purchase charged to your card. Your Sony Reward Catalog will be mailed to you shortly.</p> <p>*****500 FREE HOURS For New AOL Members***** Enjoy America Online FREE for a month, up to 500 HOURS. No risk. Free trial. Call today for membership details. 1-800-463-1908.</p>								

Account Summary								Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due
Purchases								Amount OCL	Fees
Advances								Past Due	Min Amt Due
Total									
Rate Summary		PURCHASES	ADVANCES						
Number of days this Billing Period				32					
Balance subject to Finance Charge									
Periodic Rate		.03739%	.05476%						
Nominal Annual Percentage Rate		13.650%	19.990%						
Annual Percentage Rate		13.650%	19.990%						

06/12/00

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCCJ

PREVIOUS DATE

NEW

OLD

MIN/AMOUNT

FD-NV

00 A1 2 0499 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number  
4128 0038 2845 7807  
PAYMENT DUE DATE 06/12/00

Statement Date: 05/17/00    Total Credit Line: \$19600    Cash Advance Limit: \$5000    New Balance: \$ .00    Available Credit Line: \$19600    Available Cash Line: \$5000

Sale Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
			<p>If you have not received your new card, please call the Customer Service number on this statement.</p> <p>Our records show home phone 810-469-7900 and business phone 810-469-7900. Please update above coupon if incorrect.</p> <p>WELCOME to Sony Citibank Platinum Select cardmembership. We hope you will enjoy the benefits and rewards this program offers. Your card is accepted at over 16 million locations worldwide.</p> <p>Start accumulating Sony Points immediately with every eligible purchase charged to your card. Your Sony Reward Catalog will be mailed to you shortly.</p>					

Account Summary								Amount Due:	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due
Purchases								Amount Oct	
Advances								Fees	
Total								Past Due	
								Min Amt Due	

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	30		
Balance subject to Finance Charge			
Periodic Rate		.03808%	.05476%
Nominal Annual Percentage Rate		13.900%	19.990%
Annual Percentage Rate		13.900%	19.990%

07/12/00

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC1

PMI DUE DATE

RENEW

MIN AMT DUE

FO-NV

00 A1 2 0499 v1 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807  
PAYMENT DUE DATE 07/12/00

Statement Date    Total Credit Line    Cash Advance Limit    New Balance    Available Credit Line    Available Cash Line  
06/19/00            \$19600            \$5000            \$ .00            \$19600            \$5000

State	DT	Post DT	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
				<p>WELCOME to Sony Citibank Platinum Select cardmembership. We hope you will enjoy the benefits and rewards this program offers. Your card is accepted at over 16 million locations worldwide.</p> <p>Start accumulating Sony Points immediately with every eligible purchase charged to your Sony Card. Your Sony Reward Catalog will be mailed to you shortly.</p>					

Account Summary								Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due
Purchases								Amount OCL	Fees
Advances								Past Due	Min Amt Due
Total									

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	33		
Balance subject to Finance Charge			
Periodic Rate		.03808%	.05476%
Nominal Annual Percentage Rate		13.900%	19.990%
Annual Percentage Rate		13.900%	19.990%

08/11/00

\$ .00

\$ .00

SITE:KC-CL TM:CO-5000 ACID:KCC

IMMEDIATE DATE

NEW

VO

MIN AMT DUE

FO-NV

00 A1 2 0499 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 08/11/00

Statement Date    Total Credit Line    Cash Advance Limit    New Balance    Available Credit Line    Available Cash Line  
07/18/00            \$19600            \$5000            \$ .00            \$19600            \$5000

Sale Dt	Post Dt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic

Account Summary							Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Per Min Due
Purchases								Adv Min Due
Advances								Amount OCL
Total								Fees
								Past Due
								Min Amt Due

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	29		
Balance subject to Finance Charge			
Periodic Rate		03945%	05476%
Nominal Annual Percentage Rate		14.400%	19.990%
Annual Percentage Rate		14.400%	19.990%



FD-NV 00 A1 2 0499 vI 0000 VI 4 05/11/06 20:45:21

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH  
 83536-9410

CITIBANK  
 P.O. BOX 6411  
 THE LAKES, NV  
 USA 88901-6411

ID

For Customer Service call or write

1-800-950-5114  
 BOX 6000  
 THE LAKES, NV  
 89163-6000

For billing inquiries write to  
 this address; calling will not  
 preserve your rights.

Sony  
 Citibank Platinum Select  
 Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 09/11/00

Statement Date 08/17/00 Total Credit Line \$19600 Cash Advance Limit \$5000 New Balance \$ .00 Available Credit Line \$19600 Available Cash Line \$5000

Stale Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mtr #	RA	Sic

Account Summary							Amount Due			
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due	Amount OCL
Purchases										
Advances										
Total										

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	30		
Balance subject to Finance Charge			
Periodic Rate		.03945%	.05476%
Nominal Annual Percentage Rate		14.400%	19.990%
Annual Percentage Rate		14.400%	19.990%

10/10/00 \$ .00 \$ .00  
 PREVIOUS DATE NEW GET MIN-AMT/DUE

SITE:KC-CL TM:CO-5000 ACID:KCCI

FO-NV 00 AI 2 0499 VI 0000 VI 4 05/11/06 20:45:21

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH  
 83536-9410

ID

CITIBANK  
 P.O. BOX 6411  
 THE LAKES, NV  
 USA 88901-6411

For Customer Service call or write

1-800-950-5114  
 BOX 6000  
 THE LAKES, NV  
 89163-6000

For billing inquiries write to  
 this address; calling will not  
 preserve your rights.

Sony  
 Citibank Platinum Select  
 Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 10/10/00

Statement Date Total Credit Line Cash Advance Limit New Balance Available Credit Line Available Cash Line  
 09/18/00 \$19600 \$5000 \$ .00 \$19600 \$5000

Sale Dt	Post Dt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
			<p><b>IMPORTANT PROGRAM UPDATE:</b>            Buyers Security is now underwritten by Triton Insurance Company. Please be assured that coverage provided by this program remains unchanged.</p> <p><b>IMPORTANT PROGRAM UPDATE:</b>            The Automatic Travel Accident Insurance benefit program is now underwritten by American National Insurance Company. For questions pertaining to coverage call 1-800-538-4077.</p>					

Account Summary							Amount Due			
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Actv Min Due	Amount OCL
Purchases								Fees	Past Due	Min Amt Due
Advances										
Total										

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	32		
Balance subject to Finance Charge			
Periodic Rate		.03945%	.05476%
Nominal Annual Percentage Rate		14.400%	19.990%
Annual Percentage Rate		14.400%	19.990%

11/09/00

\$ .00

\$ .00

SITE:KC-CL TM:CO-5000 ACID:KCC1001

PMT DUE DATE

NEW

CL

MIN AMT DUE

FO-NV

00 A1 2 0499 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 11/09/00

Statement Date    Total Credit Line    Cash Advance Limit    New Balance    Available Credit Line    Available Cash Line  
10/16/00            \$19600                \$5000                \$ .00                    \$19600                \$5000

Sale Dt	Post Dt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
			IMPORTANT PROGRAM UPDATE: The Automatic Travel Accident Insurance benefit program is now underwritten by American National Insurance Company. For questions pertaining to coverage call 1-800-538-4077.					
			IMPORTANT PROGRAM UPDATE: Buyers Security is now underwritten by Triton Insurance Company. Please be assured that coverage provided by this program remains unchanged.					

Account Summary							Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due
Purchases								Adv Min Due
Advances								Amount OCL
Total								Fees
								Past Due
								Min Amt Due

Rate Summary	PURCHASES	ADVANCES
Number of days this Billing Period	28	
Balance subject to Finance Charge		
Periodic Rate	.03945%	.05476%
Nominal Annual Percentage Rate	14.400%	19.990%
Annual Percentage Rate	14.400%	19.990%

FD-NV 00 A1 2 0499 VI 0000 VI 4 05/11/06 20:45:21

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH  
 83536-9410

CITIBANK  
 P.O. BOX 6411  
 THE LAKES, NV  
 USA 88901-6411

ID

For Customer Service call or write

1-800-950-5114  
 BOX 6000  
 THE LAKES, NV  
 89163-6000

For billing inquiries write to  
 this address; calling will not  
 preserve your rights.

Sony  
 Citibank Platinum Select  
 Account Number:

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 12/11/00

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
11/15/00	\$19600	\$5000	\$ .00	\$19600	\$5000

Stale Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
			Our records show home phone 810-469-7900 and business phone 810-469-7900. Please update above coupon if incorrect.					
			<b>IMPORTANT PROGRAM UPDATE:</b> The Automatic Travel Accident Insurance benefit program is now underwritten by American National Insurance Company. For questions pertaining to coverage call 1-800-538-4077.					
			<b>IMPORTANT PROGRAM UPDATE:</b> Buyers Security is now underwritten by Triton Insurance Company. Please be assured that coverage provided by this program remains unchanged.					

Account Summary							Amount Due			
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due	Amount OCL
Purchases								Fees	Past Due	Min Amt Due
Advances										
Total										

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	30		
Balance subject to Finance Charge			
Periodic Rate		.03945%	.05476%
Nominal Annual Percentage Rate		14.400%	19.990%
Annual Percentage Rate		14.400%	19.990%

01/09/01

989.94

\$20.00

SITE:KC-CL TM:CO-5000 ACID:KCC15

NV

00 A1 2 0499 √ 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

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this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 01/09/01

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
12/15/00	\$19600	\$5000	\$89.94	\$19510	\$5000

Sale Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	SIG
120601	206K	ZYOSNS6	BCH*MT CLEMENS DIR	800-546-6411 NY	8994	61Q5969US	AV10	24266570341
* SONY POINTS SUMMARY *				TOTAL				
Last Month's Balance				0				
Points Earned this Month				2,090				
Points Redeemed/Expired				0				
Current Balance				2,090				
EXCLUSIVE WEBSITE FOR SONY CARDMEMBERS! Visit us at <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a> and enter password 2979.								
***SPECIAL 5 SONY POINTS OFFER!*** Earn 5 Sony Points per dollar spent on all Sony purchases made between Nov. 1 and Dec. 31, 2000. Mail a copy of your receipt along with Sony Points/ Credit Request Form within 60 days of purchase.								
***HOT DEALS ON SONY STUFF*** Check out the Sony Card website frequently for the latest redemption specials. Go to <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a> and click on the Rewards Catalog page to find HOT DEALS.								

Account Summary							Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due
Purchases		8994					8994	2000
Advances								
Total		8994					8994	2000

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	30		
Balance subject to Finance Charge			
Periodic Rate	.03945%	.05476%	
Nominal Annual Percentage Rate	14.400%	19.990%	
Annual Percentage Rate	14.400%	19.990%	

02/09/01 \$120.12 \$40.00  
 DUE DATE NEW MINIMUM DUE

SITE:KC-CL TM:CO-5000 ACID:KCCI

NV 00 A1 2 0499 VI 0000 VI 4 05/11/06 20:45:21

MIRIAM G CARROLL  
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 83536-9410

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 USA 88901-6411

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 BOX 6000  
 THE LAKES, NV  
 89163-6000

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 this address; calling will not  
 preserve your rights.

Sony  
 Citibank Platinum Select  
 Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 02/09/01

Statement Date Total Credit Line Cash Advance Limit New Balance Available Credit Line Available Cash Line  
 01/17/01 \$19600 \$5000 \$120.12 \$19479 \$5000

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
01/17/01	\$19600	\$5000	\$120.12	\$19479	\$5000

Statement Date	Reference #	Activity Since Last Statement	Amount	Y/C	Bin # or Mer #	RA	Sic
0117		LATE FEE - DEC PAYMENT PAST DUE	2900	66 0000		0	700000000000
0117		PURCHASES*FINANCE CHARGE*PERIODIC RATE	118	84 0000		0	700000000000
		* SONY POINTS SUMMARY *					
		TOTAL					
		Last Month's Balance	2,090				
		Points Earned this Month	0				
		Points Redeemed/Expired	0				
		Current Balance	2,090				
<p>The Annual Percentage Rate on your account is subject to increase and you may risk losing your ability to earn Sony Points when you fail to make a payment to us or any other creditor when due, exceed your credit limit, or make a payment to us that is not honored by your bank.</p> <p>Now you have the power to send and receive money by email! Introducing c2it(SM) service by Citibank. With c2it you can repay a friend for dinner, or pay for an online auction purchase, all through your email. Sign onto <a href="http://www.c2it.com/send24">www.c2it.com/send24</a> to learn more!</p> <p>Shop. Connect. Play. <a href="http://SonyStyle.com">SonyStyle.com</a> offers the latest in cool new products including the Sony VAIO Digital Studio Series Desktop PC &amp; the full line of Digital Cameras &amp; Camcorders. Edit movies &amp; share photos online. Buy direct at <a href="http://Sonystyle.com">Sonystyle.com</a></p>							

Account Summary								Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	2000
Purchases	8994				118	2900	12012	Adv Min Due	
Advances								Amount OCL	
Total	8994				118	2900	12012	Fees	
								Past Due	2000
								Min Amt Due	4000

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	- 33		
Balance subject to Finance Charge	90.51		
Periodic Rate	.03945%	.05476%	
Nominal Annual Percentage Rate	14.400%	19.990%	
Annual Percentage Rate	14.400%	19.990%	

03/12/01

\$ .00

\$ .00

SITE:KC-CL TM:CO-5000 ACID:KCC19

PM DUE DATE

NEW

VOID

VOID AMT DUE

FO-NV

00 A1 2 0495 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 03/12/01

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
02/15/01	\$19600	\$5000	\$ .00	\$19600	\$5000

Salc Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
		012497642077	PAYMENT THANK YOU	12012	-70	0000	0	0
* SONY POINTS SUMMARY *				TOTAL				
Last Month's Balance				2,090				
Points Earned this Month				0				
Points Redeemed/Expired				0				
Current Balance				2,090				
Get 3 months of optional Citibank Credit Protector FREE when you enroll today! Simply initial the box in the lower left-hand corner of your billing statement coupon. Remember to return the coupon with your payment.								
*** EARN 10 SONY POINTS WITH SONYSTYLE.COM *** Shop on sonystyle.com and earn 10 Sony Points per dollar spent on your Sony Card from 2/15/01 - 4/15/01. For more details on this offer go to <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a>								
EXCLUSIVE WEBSITE FOR SONY CARDMEMBERS! Visit us at <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a> and register for your free Inside eTrack newsletter.								

Account Summary							Amount Due	
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due
Purchases	12012		12012					Adv Min Due
Advances								Amount OCL
Total	12012		12012					Fees
								Past Due
								Min Amt Due

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period - 29			
Balance subject to Finance Charge			
Periodic Rate		.03945%	.05476%
Nominal Annual Percentage Rate		14.400%	19.990%
Annual Percentage Rate		14.400%	19.990%

04/11/01

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCCI

PREVIOUS DATE

NEW

MIN AMT DUE

FO-NV

00 A1 2 0495 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

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THE LAKES, NV  
USA 88901-6411

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BOX 6000  
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89163-6000

For billing inquiries write to  
this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 04/11/01

Statement Date    Total Credit Line    Cash Advance Limit    New Balance    Available Credit Line    Available Cash Line  
03/19/01    \$19600    \$5000    \$ .00    \$19600    \$5000

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
03/19/01	\$19600	\$5000	\$ .00	\$19600	\$5000

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
03/19/01	\$19600	\$5000	\$ .00	\$19600	\$5000

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
03/19/01	\$19600	\$5000	\$ .00	\$19600	\$5000

Statement Date	Total Credit Line	Cash Advance Limit	New Balance	Available Credit Line	Available Cash Line
03/19/01	\$19600	\$5000	\$ .00	\$19600	\$5000

Account Summary	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Amount Due
Purchases								Pur Min Due
Advances								Adv Min Due
Total								Amount OCL
								Fees
								Past Due
								Min Amt Due

Rate Summary	PURCHASES	ADVANCES
Number of days this Billing Period		
32		
Balance subject to Finance Charge		
Periodic Rate	.03808%	.05476%
Nominal Annual Percentage Rate	13.900%	19.990%
Annual Percentage Rate	13.900%	19.990%



05/10/01

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC1

PAID DUE DATE

NEW

CE

MIN AMT DUE

FO-NV

00 A1 1 0499 VI 0000 VI 4

05/11/06

20:45:21

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410

ID

CITIBANK  
P.O. BOX 6411  
THE LAKES, NV  
USA 88901-6411

For Customer Service call or write

1-800-950-5114  
BOX 6000  
THE LAKES, NV  
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this address; calling will not  
preserve your rights.

Sony  
Citibank Platinum Select  
Account Number

4128 0038 2845 7807

Payment must be received by 1:00 pm local time on 05/10/01

Statement Date Total Credit Line Cash Advance Limit New Balance Available Credit Line Available Cash Line  
04/17/01 \$19600 \$5000 \$ .00 \$19600 \$5000

Sale Dt	PostDt	Reference #	Activity Since Last Statement	Amount	T/C	Bin # or Mer #	RA	Sic
	0417		MEMBERSHIP FEE APR 01-MAR 02	00	74	0000	0	7000000000
* SONY POINTS SUMMARY *				TOTAL				
Last Month's Balance				2,090				
Points Earned this Month				0				
Points Redeemed/Expired				0				
Current Balance				2,090				
Please see the enclosed privacy notice for important information.								
IMPORTANT PROGRAM INFORMATION: Visa renewed the insurance coverage with Virginia Surety Company, extending Auto Rental Insurance and Warranty Manager through February 28, 2002.								
***Get 1,000 FREE Sony Points*** Register online at <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a> To receive our Inside e-Track newsletter and receive 1,000 FREE Sony Points. Check your Sony Rewards 2001 catalog for details.								
***Sony Card Online Sweepstakes*** Sign up for our Inside e-Track newsletter at <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a> and automatically be entered into our online sweepstakes. To see the latest Prize list and details go to <a href="http://www.sony.com/sonycard">www.sony.com/sonycard</a>								

Account Summary							Amount Due			
	Previous Balance	+ Purchases & Advances	- Payments	- Credits	+ Finance Charges	+ Late Charges	= Balance	Pur Min Due	Adv Min Due	Amount OCL
Purchases										
Advances										
Total										
										Min Amt Due

Rate Summary		PURCHASES	ADVANCES
Number of days this Billing Period	29		
Balance subject to Finance Charge			
Periodic Rate		.03671%	.05476%
Nominal Annual Percentage Rate		13.400%	19.990%
Annual Percentage Rate		13.400%	19.990%

06/11/01

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC 1

05/11/06

20:52:54

PMT. DUE DATE    DATE    AMOUNT    MIN. AMT. DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128-0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 06/11/2001

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
05/16/2001	\$19600	\$19600	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
-----------	-----------	------------------	-------------------------------	--------

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

If you have not received your new card, please call the Customer Service number on this statement.

Our records show home phone 810-469-7900 and business phone 810-469-7900. Please update above coupon if incorrect.

Notice anything different about your statement? It has a new look. We've moved information around to make it easier to find what's most important to you. Go to [www.accountonline.com](http://www.accountonline.com), login and click on "New statement highlights" and see for yourself.

CALL 1-800-444-1676 TO ACTIVATE YOUR CARD. You've already received your new Sony Citibank Card in the mail. In order to use your card -- and enjoy its benefits -- you must call 1-800-444-1676. CALL TODAY!

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03534%(D)	12.900%	12.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

1638

07/10/01 \$1,533.19 \$406.00

SITE:KC-CL TM:CO-5000 ACID:KCC 1  
05/11/06 20:52:54

PMT DUE DATE DE AMOUNT DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

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# The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 07/10/2001

To report billing errors, write  
to this address; calling will  
not preserve your rights. BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
06/15/2001	\$19600	\$66	\$5000	\$66	\$19533.19
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$406.00 =	\$406.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
6/07	6/07	B3601394	BAL XFER CARROLL, MIRIAM G CHARGE TO BALANCE 2	19,500.00
	6/15		61 0000US 0 0 PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2	7 0000
			84 0000 0	33.19
				70000000000

\* SONY POINTS SUMMARY \*  
Last Month's Balance 2,090  
Points Earned this Month 0  
Points Redeemed/Expired 0  
Current Balance 2,090

CALL 1-800-444-1676 TO ACTIVATE YOUR CARD. You've  
already received your new Sony Citibank Card in the  
mail. In order to use your card -- and enjoy its  
benefits -- you must call 1-800-444-1676. CALL  
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\*\*\*Get 1,000 FREE Sony Points\*\*\*  
Register online at [www.sony.com/sonycard](http://www.sony.com/sonycard)  
to receive our Inside e-Track newsletter and receive  
1,000 FREE Sony Points. Check your Sony Rewards  
2001 catalog for details.

\*\*\*Sony Card Online Sweepstakes\*\*\*  
Sign up for our Inside e-Track newsletter at  
[www.sony.com/sonycard](http://www.sony.com/sonycard) and automatically be entered  
into our online sweepstakes. To see the latest Prize  
list and details go to [www.sony.com/sonycard](http://www.sony.com/sonycard)

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$0.00	\$19,500.00	\$0.00	\$33.19	\$19,533.19
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$19,500.00	\$0.00	\$33.19	\$19,533.19

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03397%(D)	12.400%	12.400%
Balance 2	\$5,854.42	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

08/10/01 \$19225.06 \$400.00

SITE:KC-CL TM:CO-5000 ACID:KCC 1  
05/11/06 20:52:54

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 08/10/2001

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 07/17/2001	Total Credit Line \$19600	Available Credit Line \$374	Cash Advance Limit \$5000	Available Cash Limit \$374	New Balance \$19225.06
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$400.00 =	Minimum Amount Due \$400.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	6/28	13405136	PAYMENT THANK YOU 70 0000 0 0	-425.00
	7/17		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2 84 0000 0	116.87 70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Please see the enclosed Change in Terms notice for important information about changes to your Citibank Card Agreement. These changes will be effective on the day after your August 2001 billing statement and will appear on your September statement.

CALL 1-800-444-1676 TO ACTIVATE YOUR CARD. You've already received your new Sony Citibank Card in the mail. In order to use your card -- and enjoy its benefits -- you must call 1-800-444-1676. CALL TODAY!

Visit the Sony warehouse at [www.sony.com/sonycard](http://www.sony.com/sonycard) and enter password 8524 for great details on Sony merchandise.

You Could Become the Ultimate Hollywood V.I.P.! Buy Close Encounters & other specially marked DVDs & videos from Columbia TriStar Home Entertainment - get points to use online to bid on great Hollywood prizes! Visit [moviepoints.lycos.com](http://moviepoints.lycos.com) for details.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,533.19	\$0.00	\$425.00	\$116.87	\$19,225.06
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,533.19	\$0.00	\$425.00	\$116.87	\$19,225.06

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03260%(D)	11.900%	11.900%
Balance 2	\$19,324.42	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

09/10/01 \$18908.48 \$393.00

SITE:KC-CL TM:CO-5000 ACID:KCC. 1  
05/11/06 20:52:54:

MIRIAM G. CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
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THE LAKES, NV  
88901-6411

**The Sony Card from Citi<sup>®</sup>  
Platinum Select<sup>®</sup>**

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128 0038 2845 7807

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 09/10/2001

Statement/Closing Date 08/16/2001	Total Credit Line \$19600	Available Credit Line \$691	Cash Advance Limit \$5000	Available Cash Limit \$691	New Balance \$18908.48
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$393.00 =	Minimum Amount Due \$393.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	8/06	14080314	PAYMENT THANK YOU 70 0000 0 0	-425.00
	8/16		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2 84 0000 0	108.42 70000000000

\* SONY POINTS SUMMARY \*  
Last Month's Balance 2,090  
Points Earned this Month 0  
Points Redeemed/Expired 0  
Current Balance 2,090

CALL 1-800-444-1676 TO ACTIVATE YOUR CARD. You've  
already received your new Sony Citibank Card in the  
mail. In order to use your card -- and enjoy its  
benefits -- you must call 1-800-444-1676. CALL  
TODAY!

Visit the Sony warehouse at [www.sony.com/sonycard](http://www.sony.com/sonycard)  
and enter password 8524 for great deals on Sony  
merchandise.

\*\*\*\*\*New FINANCIAL SOLUTIONS page\*\*\*\*\*  
Visit our new FINANCIAL SOLUTIONS page at  
[www.financialsolutions.citibank.com](http://www.financialsolutions.citibank.com) & check out our  
exciting new products and services all in one  
convenient location on our website.

Design your own shopping experience- Introducing  
CitiPrivileges-now easily accessible through  
Cardmember Central at [www.citicards.com](http://www.citicards.com). Customize  
your shopping experience by choosing your shopping  
categories of interest and see the offers you want!

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,225.06	\$0.00	\$425.00	\$108.42	\$18,908.48
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,225.06	\$0.00	\$425.00	\$108.42	\$18,908.48

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03192%(D)	11.650%	11.650%
Balance 2	\$19,121.86	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

10/11/01 \$18596.48 \$387.00

SITE:KC-CL TM:CO-5000 ACID:KCC 1  
05/11/06 20:52:54

PAID DATE DEBIT CREDIT OPEN AMT OUT

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID  
83536-9410000

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 10/11/2001

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 09/17/2001	Total Credit Line \$19600	Available Credit Line \$1003	Cash Advance Limit \$5000	Available Cash Limit \$1003	New Balance \$18596.48
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$387.00 =	Minimum Amount Due \$387.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	8/28	12039194	PAYMENT THANK YOU 70 0000 0 0	-425.00
	9/17		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2 84 0000 0	113.00 70000000000

\* SONY POINTS SUMMARY \*

Last Month's Balance	TOTAL
Points Earned this Month	2,090
Points Redeemed/Expired	0
Current Balance	0
	2,090

CALL 1-800-444-1676 TO ACTIVATE YOUR CARD. You've already received your new Sony Card from Citi in the mail. In order to use your card -- and enjoy its benefits -- you must call 1-800-444-1676. CALL TODAY!

Don't like surprises? Visit the new Cardmember Central at [www.citicards.com](http://www.citicards.com) and view your Citi Card account information 24 hours a day, 7 days a week. This new site hosts your Account Online plus many more exciting services, just for you!

Should I lease a car or purchase one? How much insurance do I need? How much mortgage can I afford? Should I go for bonds or stocks? We have tools and calculators to help you answer these and many other questions. Visit [www.financialsolutions.com](http://www.financialsolutions.com) today!

Help the American Cancer Society fight breast cancer by reminding the women you care about to get a mammogram. To find out more about breast cancer, call the American Cancer Society at 1-800-ACS-2345 or visit [www.cancer.org](http://www.cancer.org) anytime.

MIRIAM G CARROLL

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
-----------	-----------	------------------	-------------------------------	--------

PURCHASES	\$18,908.48	\$0.00	\$425.00	\$113.00	\$18,596.48
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$18,908.48	\$0.00	\$425.00	\$113.00	\$18,596.48

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03192%(D)	11.650%	11.650%
Balance 2	\$18,684.54	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

11/09/01 \$18275.60 \$380.00

SITE:KC-CL TM:CO-5000 ACID:KCC!  
05/11/06 20:52.54:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

The Sony Card from Citi®  
Platinum Select®

For Customer Service, call or write  
1-800-950-5114

Account Number  
4128 0038 2845 7807

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 11/09/2001

Statement/Closing Date 10/17/2001	Total Credit Line \$19600	Available Credit Line \$1324	Cash Advance Limit \$5000	Available Cash Limit \$1324	New Balance \$18275.60
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv. Minimum Due \$380.00 =	Minimum Amount Due \$380.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	9/28	11511240	PAYMENT THANK YOU 70 0000 0 0	-425.00
	10/17		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE Z 84 0000 0	104.12 70000000000

\* SONY POINTS SUMMARY \*  
Last Month's Balance 2,090  
Points Earned this Month 0  
Points Redeemed/Expired 0  
Current Balance 2,090

PLEASE SEE THE ENCLOSED CHANGE IN TERMS NOTICE  
FOR IMPORTANT INFORMATION ABOUT THE BINDING  
ARBITRATION PROVISION WE ARE ADDING TO YOUR  
CITIBANK CARD AGREEMENT.

The Citigroup Relief Fund will provide scholarships  
for children of victims of the September 11th  
tragedy. Help make their future more secure with a  
tax-deductible contribution. Complete information is  
available at [www.citigroup.com](http://www.citigroup.com) or 1-888-441-CITI.

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Perfect for lulling children to sleep, or relaxing  
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Account Online's All Electronic option.  
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Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$18,596.48	\$0.00	\$425.00	\$104.12	\$18,275.60
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$18,596.48	\$0.00	\$425.00	\$104.12	\$18,275.60

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.03123%(D)	11.400%	11.400%
Balance Z	\$18,363.69	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%



12/10/01 \$17949.75 \$373.00

SITE:KC-CL TM:CO-5000 ACID:KCC1  
05/11/06 20:5 4:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

**The Sony Card from Citi®  
Platinum Select®**

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 12/10/2001.

To report billing errors, write  
to this address; calling will  
not preserve your rights.  
BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 11/15/2001	Total Credit Line \$19600	Available Credit Line \$1650	Cash Advance Limit \$5000	Available Cash Limit \$1650	New Balance \$17949.75
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$373.00 =	Minimum Amount Due \$373.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	10/31	11738148	PAYMENT THANK YOU 70 0000 0 0	-425.00
	11/15		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2 84 0000 0	99.15 70000000000

\* SONY POINTS SUMMARY \*  
Last Month's Balance 2,090  
Points Earned this Month 0  
Points Redeemed/Expired 0  
Current Balance 2,090

Our records show home phone 810-469-7900 and  
business phone 810-469-7900. Please update above  
coupon if incorrect.

Get 30 days of optional Citibank Credit Protector  
FREE when you enroll today! Simply initial the box  
in the lower left-hand corner of your billing  
statement coupon. Remember to return the coupon  
with your payment.

WITHIN THE LAST 30 DAYS YOU SHOULD HAVE RECEIVED AN  
IMPORTANT NOTICE ABOUT ADDING BINDING ARBITRATION  
TO YOUR CITIBANK CARD AGREEMENT. IF YOU WOULD LIKE  
ANOTHER COPY PLEASE CALL THE CUSTOMER SERVICE  
NUMBER LISTED ABOVE.

Reminder: You may be assessed an over-the-credit-  
line fee if your balance exceeds your Total Credit  
Line as stated above.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$18,275.60	\$0.00	\$425.00	\$99.15	\$17,949.75
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$18,275.60	\$0.00	\$425.00	\$99.15	\$17,949.75

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES	\$0.00	0.02986%(D)	10.900%	10.900%
Standard Purch	\$18,089.22	0.01890%(D)	6.900%	6.900%
Balance 2	\$0.00	0.05477%(D)	19.990%	19.990%
ADVANCES				

01/10/02 \$17632.74 \$367.00

SITE:KC-CL TM:CO-5000 ACID:KCC1  
05/11/06 20:5 34:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 01/10/2002

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
12/17/2001	\$19600	\$1967	\$5000	\$1967	\$17632.74
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$367.00 =	\$367.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	12/07	13668066	PAYMENT THANK YOU 70 0000	-425.00
	12/17		PURCHASES*FINANCE CHARGE*PERIODIC RATE CHARGE TO BALANCE 2 84 0000	107.99 7000000000

\* SONY POINTS SUMMARY \*

Last Month's Balance	TOTAL
Points Earned this Month	2,090
Points Redeemed/Expired	0
Current Balance	0
	2,090

Good News! You can continue to order great Sony merchandise including CD's and DVD's from the 2001 Sony Rewards Catalog through Feb. 2002 or by logging onto [www.sony.com/sonycard](http://www.sony.com/sonycard) - a new catalog will be mailed to you in Feb. 2002.

Look for new holiday releases from great artists at your favorite music stores: Destiny's Child, Macy Gray, Charlotte Church, Incubus, Yo-Yo Ma, Stevie Ray Vaughan, Vangelis, Jeffrey Stelle, Billie Holiday, Professional Bull Riders.

Be in control of your Citi Card account. Register for Account Online and see what it can do for you! Check your balance, track unbilled activity, view purchases, and make payments. All this and more at [www.citicards.com](http://www.citicards.com)

Notice: The Home Reference Library (over \$100 value) provided to you by Synapse Solutions, Inc. for only \$9.97 including s&h. This software set includes Webster's Encyclopedia, Dictionary & Thesaurus, and AMA Medical Guide. Call today 1-800-883-8327!

MIRIAM G CARROLL

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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PURCHASES	\$17,949.75	\$0.00	\$425.00	\$107.99	\$17,632.74
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$17,949.75	\$0.00	\$425.00	\$107.99	\$17,632.74

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02849%(D)	10.400%	10.400%
Balance 2	\$17,856.20	0.01890%(D)	6.900%	6.900%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

1647

02/11/02

\$ .00

\$ .00

SITE:KC-CI

M:CO-5000  
05/11/06

ACID:KCC1961  
20:52:54:

PAID DATE

NEW

NEW

PAID DATE

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

For Customer Service, call or write  
1-877-717-SONY (7669)

# The Sony Card from Citi® Platinum Select™

Account Number  
4128 0038 2845 7807

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 02/11/2002

Statement/Closing Date  
01/16/2002

Total Credit Line  
\$19600

Available Credit Line  
\$19600  
Amount Over  
Credit Line  
\$0.00 +

Cash Advance Limit  
\$5000  
Past Due  
\$0.00 +

Available Cash Limit  
\$5000  
Purch/Adv  
Minimum Due  
\$0.00 =

New Balance  
\$0.00  
Minimum Amount Due  
\$0.00

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
12/31	12811306		PAYMENT THANK YOU 70 0000 0 0	-17,632.74

\* SONY POINTS SUMMARY \*

Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Good News! You can continue to order great Sony merchandise including CD's and DVD's from the 2001 Sony Rewards Catalog through Feb. 2002 or by logging onto [www.sony.com/sonycard](http://www.sony.com/sonycard) - a new catalog will be mailed to you in Mar. 2002.

Be in control of your Citi Card account. Register for Account Online and see what it can do for you! Check your balance, track unbilled activity, view purchases, and make payments. All this and more at [www.citicards.com](http://www.citicards.com)

Use your Citibank card to rent a car from Hertz and enjoy great savings in the U.S. and around the world! Call 1-800-654-2200 and mention your Citibank Hertz CDP number 160005.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$17,632.74	\$0.00	\$17,632.74	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$17,632.74	\$0.00	\$17,632.74	\$0.00	\$0.00

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES	\$0.00	0.02712%(D)	9.900%	9.900%
Standard Purch	\$0.00	0.01890%(D)	6.900%	6.900%
Balance 2	\$0.00	0.05477%(D)	19.990%	19.990%
ADVANCES	\$0.00			

03/12/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000  
05/11/06

ACID:KCC 1  
20:54

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

Account Number  
4128 0038 2845 7807

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 03/12/2002

For Customer Service, call or write  
1-877-717-SONY (7669)

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
02/15/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Reminder: You may be assessed an over-the-credit-line fee if your balance exceeds your Total Credit Line as stated above.

**YOUR TOTAL CREDIT LINE HAS CHANGED!**  
Please note your new total credit line.

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES	\$0.00	0.02644%(D)	9.650%	9.650%
Standard Purch	\$0.00	0.05477%(D)	19.990%	19.990%
ADVANCES	\$0.00			

1649

04/11/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC1941

05/11/06

20:5 4:

PMT DUE DATE

NEW

INCL

MIN AMT DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

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Account Number  
4128 0038 2845 7807

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 04/11/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
03/18/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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\* SONY POINTS SUMMARY \*

Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

TOTAL  
2,090  
0  
0  
2,090

	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES	\$0.00	0.02644%(D)	9.650%	9.650%
Standard Purch	\$0.00	0.05477%(D)	19.990%	19.990%
ADVANCES	\$0.00			

- 1650

05/10/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC1

05/11/06

20:5

4:

PMT DUE DATE    PAY    AMOUNT    MR. AMT. DUE

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 05/10/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.  
BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
04/17/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	4/17		MEMBERSHIP FEE APR 02-MAR 03 74 0000 0	0.00
				70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Get 30 days of optional Citibank Credit Protector FREE when you enroll today! Simply initial the box in the lower left-hand corner of your billing statement coupon. Remember to return the coupon with your payment.

Your nominal annual percentage rate for purchases may vary monthly and is based on the Wall Street Journal Prime Rate plus 4.900%. However, if you default on any Citibank Card Agreement, your rate may increase. The new rate will be 24.990%.

IMPORTANT PROGRAM INFORMATION: Visa's Auto Rental Insurance and Warranty Manager Service are now underwritten by Indemnity Insurance Company of North America. Please be assured that coverage has been extended to Feb. 28, 2003 and remains unchanged.

Congratulations on your recent credit line increase! Use the higher line for a family vacation, to make a major purchase, or to get something special for yourself. Whatever you choose, it simply gives you more financial flexibility.

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES	\$0.00	0.05477%(D)	19.990%	19.990%

06/10/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000  
05/11/06

ACID:KCC1  
20:5

4:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 06/10/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
05/16/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Statement Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Our records show home phone 810-469-7900 and business phone 810-469-7900. Please update above coupon if incorrect.

Customers have told us that making statements easier to read is important to them. We've listened and are excited to share our new design with you. We hope you'll agree it's now easier to keep track of your purchases, payments and other transactions.

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1652



07/11/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000  
05/11/06

ACID:KCCJ 1  
20: 34:

POST DATE      BALANCE      CREDIT BALANCE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 07/11/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
06/17/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
-----------	-----------	------------------	-------------------------------	--------

\* SONY POINTS SUMMARY \*

Last Month's Balance	
Points Earned this Month	
Points Redeemed/Expired	
Current Balance	

TOTAL  
2,090  
0  
0  
2,090

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1653

08/12/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000

ACID:KCC1

05/11/06

20:5

4:

PNF 08/12/02

REV

ANCE

MR 08/12/02

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 08/12/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
07/17/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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\* SONY POINTS SUMMARY \*

Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

TOTAL  
2,090  
0  
0  
2,090

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1654

09/10/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000  
05/11/06

ACID:KCC 1  
20:52:54:

PAID DUE DATE NEW ONCE MIN AM DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 09/10/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
08/16/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sak Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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\* SONY POINTS SUMMARY \*

Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

TOTAL  
2,090  
0  
0  
2,090

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1655

10/11/02

\$ .00

\$ .00

SITE:KC-CL

TM:CO-5000  
05/11/06

ACID:KCC1  
20:00:4:

PRINT DATE KEY UNCE MONTH END

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 10/11/2002

To report billing errors, write  
to this address; calling will  
not preserve your rights.  
BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
09/17/2002	\$20590	\$20590	\$5000	\$5000	\$0.00
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$0.00 =	\$0.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Please see the enclosed privacy notice for important information.

If it hasn't already, breast cancer will touch you or someone you know. Make a difference in the fight against this disease by getting involved with the American Cancer Society's Making Strides Against Breast Cancer. 1-800-ACS-2345/www.cancer.org

PURCHASES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
ADVANCES Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1656

11/11/02 \$20059.13 \$417.00

SITE:KC-CL TM:CO-5000  
05/11/06

ACID:KCC1  
20:14:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

### The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

Account Number  
4128 0038 2845 7807

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 11/11/2002

For Customer Service, call or write  
1-877-717-SONY (7669)

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
10/17/2002	\$20590	\$530	\$5000	\$530	\$20059.13
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$417.00 =	\$417.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
9/26	9/26	B3600739	Balance Transfer - Charged To Offer 5	
			BAL XFER MIRIAM G CARROLL	20,000.00
			61 0000US 0 0	7 0000
	10/17		PURCHASES*FINANCE CHARGE*PERIODIC RATE	59.13
			84 0000 0	70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

IMPORTANT NOTICE: As of 9/1/02 your Common Carrier Travel Accident Insurance is underwritten by National Union Fire Ins. Co. of Pittsburgh, Pa., under policy 9028666. Coverage remains the same. The phone no. for coverage questions is 1-800-538-4077.

Once you start watching, you can't stop playing! The classic game show PYRAMID is back-with host Donny Osmond! Visit pyramidgameshow.com for show listings, the scoop on celebrity guests, and when the Pyramid City Sweep tour is coming to you!

Early detection can save lives from breast cancer. To learn more about mammograms, clinical breast exams and breast self-examination, call your American Cancer Society at 1-800-ACS-2345 or visit [www.cancer.org](http://www.cancer.org)

Credit Protector covers your account in case of job loss, disability or hospitalization. Also receive special benefits for events like marriage, becoming a parent, or moving. Call 1-877-891-5671 to sign up and receive your first 30 days of protection free!

MIRIAM G CARROLL

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
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PURCHASES	\$0.00	\$20,000.00	\$0.00	\$59.13	\$20,059.13
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$0.00	\$20,000.00	\$0.00	\$59.13	\$20,059.13

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
Offer 5	\$14,687.35	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1058

12/10/02 \$19719.90 \$410.00  
STATEMENT DATE NEW FINCH FOR AMT. DUE

SITE:KC-CL TM:CO-5000 ACID:KCC 51  
 05/11/06 20. 154:

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH  
 83536-9410000

ID

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV  
 88901-6411

**The Sony Card from Citi®  
 Platinum Select®**

For Customer Service, call or write  
 1-877-717-SONY (7669)

Account Number  
 4128 0038 2845 7807  
 PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 12/10/2002

To report billing errors, write  
 to this address; calling will  
 not preserve your rights. BOX 6000  
 THE LAKES, NV  
 89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
11/15/2002	\$20590	\$870	\$5000	\$870	\$19719.90
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$410.00 =	\$410.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	11/08	34932353	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-417.00
	11/15		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	77.77 70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Our records show home phone 810-469-7900 and  
 business phone 810-469-7900. Please update above  
 coupon if incorrect.

\*\*\* SPECIAL 5 SONY POINTS OFFER \*\*\*  
 Earn 5 Sony Points per dollar spent on all Sony  
 purchases made between Nov. 1 and Dec. 31, 2002.  
 Mail a copy of your receipt along with Sony Points/  
 Credit Request Form within 60 days of purchase.

Swords, sorcery, dragons, knights and wizards. It's  
 right here in EverQuest. You can be whoever you want  
 to be online. EverQuest is the #1 online role  
 playing game, and there are over 420,000 players  
 waiting for you to join. Visit [www.everquest.com](http://www.everquest.com)

\*\*SONY'S VIDEO2DVD(TM) SERVICE TURNS YOUR VIDEOTAPES  
 INTO DVD & CD\*\* Transfer your home movies, wedding,  
 sports events and more to DVD! Get 5 Sony Points per  
 dollar spent at Sony's ImageStation now through  
 12/31/02. Check out [www.imagestation.com/VIDEO2DVD](http://www.imagestation.com/VIDEO2DVD)

MIRIAM G CARROLL

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
-----------	-----------	------------------	-------------------------------	--------

PURCHASES	\$20,059.13	\$0.00	\$417.00	\$77.77	\$19,719.90
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$20,059.13	\$0.00	\$417.00	\$77.77	\$19,719.90

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
Offer 5	\$19,981.77	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

- 1660



01/10/03 \$19394.27 \$404.00

SITE:KC-CL TM:CO-5000 ACID:KC 61  
05/11/06 20:54

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 01/10/2003

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 12/17/2002	Total Credit Line \$20590	Available Credit Line \$1195	Cash Advance Limit \$5000	Available Cash Limit \$1195	New Balance \$19394.27
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$404.00 =	Minimum Amount Due \$404.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	12/09	32084443	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-410.00
	12/17		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	84.37 7000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

"Sometimes I Dream" from Mario Frangoulis.  
Don't miss the debut album from Greek tenor Mario Frangoulis- "Sometimes I Dream". Featuring a duet with Justin Hayward of the Moody Blues. Romantic- the perfect gift for all women on your list.

Credit Protector covers your account in case of job loss, disability or hospitalization. Also receive special benefits for events like marriage, becoming a parent, or moving. Call 1-877-891-5671 to sign up and receive your first 30 days of protection free!

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,719.90	\$0.00	\$410.00	\$84.37	\$19,394.27
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,719.90	\$0.00	\$410.00	\$84.37	\$19,394.27

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02644%(D)	9.650%	9.650%
Offer 5	\$19,645.60	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1661

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH  
 83536-9410000

ID

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV  
 88901-6411

**The Sony Card from Citi®  
 Platinum Select®**

For Customer Service, call or write  
 1-877-717-SONY (7669)

Account Number  
 4128 0038 2845 7807

To report billing errors, write  
 to this address; calling will  
 not preserve your rights.

BOX 6000,  
 THE LAKES, NV  
 89163-6000

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 02/10/2003

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
01/16/2003	\$20590	\$1528	\$5000	\$1528	\$19061.95
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$397.00 =	\$397.00

Statement Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	1/07	31536521	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-410.00
	1/16		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	77.68 70000000000

Get 30 days of optional Citibank Credit Protector FREE when you enroll today! Simply initial as indicated in the lower left-hand corner of your billing statement coupon. Remember to return the coupon with your payment.

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Introducing the New Sony Card Web Site!  
 With an updated online rewards catalog and a dynamic look & feel, the Sony Card site makes it even more exciting to turn all of your spending into Sony products! Check out [www.sony.com/sonycard](http://www.sony.com/sonycard) today!

Those hipster HAMPSTER hoofers are back!!!  
 Happy Times Ten, the new CD from HAMPTON & THE HAMPSTERS features 11 contagious songs including "Sing A Simple Song" and a remix of their SMASH HIT 'Hampsterdance' -- PLUS a BONUS music video!

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,394.27	\$0.00	\$410.00	\$77.68	\$19,061.95
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,394.27	\$0.00	\$410.00	\$77.68	\$19,061.95

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02507%(D)	9.150%	9.150%
Offer 5	\$19,295.31	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

03/12/03 \$1,733.54 \$390.00

SITE:KC-CL TM:CO-5000 ACID:KCC 61  
05/11/06 20 454:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

The Sony Card from Citi®  
Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 03/12/2003

To report billing errors, write  
to this address; calling will  
not preserve your rights. BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
02/17/2003	\$20590	\$1856	\$5000	\$1856	\$18733.54
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$0.00 +	\$390.00 =	\$390.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	2/10	31102319	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-410.00
	2/17		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	81.59 70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

\*\*\* SPECIAL SONY CARD PROMOTION AT SONY STYLE \*\*\*  
Earn 10 Sony Points for every \$1 spent  
on your Sony Card on everything at  
Sony Style from 2/1/2003 - 3/31/2003!  
Check out [www.sonystyle.com/sonycard10pts](http://www.sonystyle.com/sonycard10pts)

Those hipster HAMPSTER hoofers are back!!!  
Happy Times Ten, the new CD from HAMPTON & THE  
HAMPSTERS features 11 contagious songs including  
"Sing A Simple Song" and a remix of their SMASH HIT  
'Hampsterdance' -- PLUS a BONUS music video!

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,061.95	\$0.00	\$410.00	\$81.59	\$18,733.54
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,061.95	\$0.00	\$410.00	\$81.59	\$18,733.54

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.02507%(D)	9.150%	9.150%
Offer 5	\$18,999.11	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

04/10/03 \$19144.11 \$788.00

SITE:KC-CL TM:CO-5000 ACID:KC 61  
05/11/06 20:52:54:

PMT DUE DATE      PAY AMT      MOR AMT DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi<sup>®</sup> Platinum Select<sup>®</sup>

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 04/10/2003

Statement/Closing Date	Total Credit Line	Available Credit Line	Cash Advance Limit	Available Cash Limit	New Balance
03/18/2003	\$24590	\$5445	\$5000	\$5000	\$19144.11
		Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
		\$0.00 +	\$390.00 +	\$398.00 =	\$788.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	3/18		Standard Purch LATE FEE - FEB PAYMENT PAST DUE 66 0000 0	35.00 70000000000
	3/18		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	375.57 70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

The Annual Percentage Rate on your account has been increased due to one of the following reasons stated in your Card Agreement with us: you failed to make a payment to us or any other creditor when due, you exceeded your credit line or you made a payment to us that was not honored by your bank.

Additionally, your ability to redeem or earn Sony Points may have been suspended. Call Monday - Friday, 7:00am to 9:00pm, or Saturday, 8:00am to 5:00pm, CT.

IMPORTANT PROGRAM INFORMATION: Visa renewed their insurance coverage with Indemnity Insurance Company of North America, extending Auto Rental Insurance and Warranty Manager through February 29, 2004.

Use your Citibank credit card to rent a car from Hertz and enjoy great savings in the U.S. and around the world! Call 1-800-654-2200 and mention your Citibank Hertz CDP number 160005.

MIRIAM G CARROLL

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
-----------	-----------	------------------	-------------------------------	--------

PURCHASES	\$18,733.54	\$35.00	\$0.00	\$375.57	\$19,144.11
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$18,733.54	\$35.00	\$0.00	\$375.57	\$19,144.11

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.06847%(D)	24.990%	24.990%
Offer 5	\$18,914.23	0.06847%(D)	24.990%	24.990%
ADVANCES				
Standard Adv	\$0.00	0.06847%(D)	24.990%	24.990%

05/09/03

\$2602.59

\$58.48

SITE:KC-CL

TM:CO-5000

ACID:KCF 51  
20 154:

05/11/06

NEW

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 05/09/2003

To report billing errors, write  
to this address; calling will  
not preserve your rights.

For Customer Service, call or write  
1-877-717-SONY (7669)

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 04/16/2003	Total Credit Line \$24590	Available Credit Line \$21987	Cash Advance Limit \$5000	Available Cash Limit \$5000	New Balance \$2602.59
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$58.48 =	Minimum Amount Due \$58.48

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
			<b>Payments, Credits &amp; Adjustments</b>	
	4/04	30814025	PAYMENT THANK YOU	-800.00
			70 0000 0 0	
	4/10	R7020756	ELECTRONIC PAYMENT-THANK YOU	-6,000.00
			70 0000 0 0	70000000000
	4/10	R7020744	ELECTRONIC PAYMENT-THANK YOU	-9,800.00
			70 0000 0 0	70000000000
	4/16		Standard Purch	
			MEMBERSHIP FEE APR 03-MAR 04	0.00
			74 0000 0	70000000000
	4/16		PURCHASES*FINANCE CHARGE*PERIODIC RATE	.18
			84 0000 0	70000000000
	4/16		Balance Transfer - Charged To Offer 5	
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	58.30
			84 0000 0	70000000000

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Your current nominal annual percentage rate for purchases may vary monthly and is based on the Wall Street Journal Prime Rate plus 4.900%. However, if you default on any Card Agreement, your rate may increase. The new rate will be up to 24.990%. These rates apply to your account at the time this statement was printed.

SONY CATALOG UPDATE! Good News - your current Sony Catalog has been extended. You can continue to redeem out of that catalog or check out the latest Sony Rewards at [www.sony.com/sonycard](http://www.sony.com/sonycard) today!

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$19,144.11	\$0.00	\$16,600.00	\$58.48	\$2,602.59
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$19,144.11	\$0.00	\$16,600.00	\$58.48	\$2,602.59

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$25.05	0.02507%(D)	9.150%	9.150%
Offer 5	\$14,980.88	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

06/09/03

\$2537.68

\$52.00

SITE:KC-CL

TM:CO-5000

ACID:KC 61

05/11/06

20:52:54:

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 06/09/2003

For Customer Service, call or write  
1-877-717-SONY (7669)

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 05/15/2003	Total Credit Line \$24590	Available Credit Line \$22052	Cash Advance Limit \$5000	Available Cash Limit \$5000	New Balance \$2537.68
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$52.00 =	Minimum Amount Due \$52.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	5/06	31191649	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-75.00
	5/15		Standard Purch PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	7000000000 .09
	5/15		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	7000000000 10.00

* SONY POINTS SUMMARY *	TOTAL
Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

Our records show home phone 208-935-7962 and  
business phone 208-926-4372. Please update above  
coupon if incorrect.

Sony Print Service Answers Your Questions  
Does Sony offer affordable, high-quality prints? Can  
I order prints in a range of sizes and styles? Is it  
possible to touch up my not-so-great photos?  
You can find the answers at [www.imagestation.com](http://www.imagestation.com)

Did you know that you won't lose a penny when you  
use your Citi(R) Card online? With Citibank's \$0  
Liability, you can have peace of mind knowing that  
you won't be held responsible for any unauthorized  
charges on your account.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$2,602.59	\$0.00	\$75.00	\$10.09	\$2,537.68
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$2,602.59	\$0.00	\$75.00	\$10.09	\$2,537.68

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$12.73	0.02507%(D)	9.150%	9.150%
Offer 5	\$2,568.90	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1667

07/11/03

\$2473.52

\$51.00

SITE:KC-LL

TM:CO-5000  
05/11/06

ACID:KC 61  
20:52:54

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411

# The Sony Card from Citi® Platinum Select®

For Customer Service, call or write  
1-877-717-SONY (7669)

Account Number  
4128 0038 2845 7807  
PAYMENT MUST BE RECEIVED BY 1:00 PM LOCAL TIME ON 07/11/2003

To report billing errors, write  
to this address; calling will  
not preserve your rights.

BOX 6000  
THE LAKES, NV  
89163-6000

Statement/Closing Date 06/16/2003	Total Credit Line \$24590	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$2473.52
		Amount Over Credit Line \$0.00 +	Past Due \$0.00 +	Purch/Adv Minimum Due \$51.00 =	Minimum Amount Due \$51.00

Sale Date	Post Date	Reference Number	Activity Since Last Statement	Amount
	6/04	33712747	Payments, Credits & Adjustments PAYMENT THANK YOU 70 0000 0 0	-75.00
	6/16		Standard Purch PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	70000000000 -10
	6/16		Balance Transfer - Charged To Offer 5 PURCHASES*FINANCE CHARGE*PERIODIC RATE 84 0000 0	70000000000 10.74

\* SONY POINTS SUMMARY \*

Last Month's Balance	2,090
Points Earned this Month	0
Points Redeemed/Expired	0
Current Balance	2,090

TOTAL  
2,090  
0  
0  
2,090

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$2,537.68	\$0.00	\$75.00	\$10.84	\$2,473.52
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$2,537.68	\$0.00	\$75.00	\$10.84	\$2,473.52

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$12.67	0.02507%(D)	9.150%	9.150%
Offer 5	\$2,499.82	0.01342%(D)	4.900%	4.900%
ADVANCES				
Standard Adv	\$0.00	0.05477%(D)	19.990%	19.990%

1668



# Citi® Diamond Preferred Entertainment Card

June 16 - July 17, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 3

Statement/Closing Date: 07/17/03

### Quick Reference

Minimum Payment	50.00
Payment Due Date*	August 11, 2003
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	24,590.00
Available Credit Line	22,181.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

### Account Summary

Previous Balance	2,473.52
Payments and Adjustments	75.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	10.28
<b>New Balance</b>	<b>\$2,408.80</b>

### Purchase Categories

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

### How to Reach Us

www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

### Cardmember News

If you have not received your new card, please call the Customer Service number on this statement.

### Important Information

Please see the enclosed privacy notice for important information.

### Celebrate Weekends with

**MasterCard(R) 7/1-9/30/03!**  
 Every time you use your Citi(R)Diamond Preferred(SM) Entertainment card, you're closer to enjoying great rewards. No purchase necessary. For complete details visit [www.mastercard.com/citibank/sweepstakes](http://www.mastercard.com/citibank/sweepstakes) today!

Thank you for being a valued customer. We built your new Citi Mastercard around you and the way you live. REMEMBER: Notify any merchants who automatically bill your account of your new account number.

date paid    amount paid    check #

\_\_\_\_\_

Please follow payment instructions outlined in the "important instructions for Making Payments" section of the statement.

05424181031382596240880050005209

Your Account Number

5424 1810 3138 2596

Payment Must Be Received By

08/11/03

Your Total Balance

\$2,408.80

Minimum Amount Due

\$50.00

Please Enter Amount of Payment Enclosed

\$

1N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1669

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	07/10	PAYMENT THANK YOU	\$75.00CR
<b>Total Payments and Adjustments</b>			<b>\$75.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	9.150%	.02507%(D)	x	31	x	\$12.69	=	\$0.10	+	\$0.00	=	9.150%
Offer 5	4.900%	.01342%(D)	x	31	x	\$2,446.47	=	\$10.18	+	\$0.00	=	4.900%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>											<b>=</b>	<b>\$10.28</b>

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Welcome to Entertainment Rewards! Use your Citi Diamond Preferred Entertainment Card for all of your everyday purchases and watch the points add up!

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

June 16 - July 17, 2003  
MIRIAM G CARROLL  
Account 5424 1810 3138 2596  
Statement/Closing Date: 07/17/03

Page 3 of 3

**NEW AND EXCITING FEATURES ON YOUR  
CARD:**

Beginning July 1, 2003 you can redeem your points on line at [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com). All your reward choices are there - if it's on the web site it can be yours.

**Life has its ups and downs!**

What do marriage, moving, having a baby, losing a job, and becoming disabled have in common? Call 1-866-439-1499 to find out how your Citi Card account can be affected.

# Citi Diamond Preferred Entertainment Card

July 17 - August 18, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Statement/Closing Date: 08/18/03

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	5.47
<b>Payment Due Date*</b>	September 11, 2003
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	24,590.00
Available Credit Line	24,584.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

**Account Summary**

Previous Balance	2,408.80
Payments and Adjustments	2,408.80
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	5.47
<b>New Balance</b>	<b>\$5.47</b>

**Purchase Categories**

Total Purchases	\$0.00
-----------------	--------

**Cardmember News**

Under the terms of your Card Agreement, the Finance Charges on this billing statement were calculated on the New Balance shown on your previous month's billing statement until payment was credited to your account.

**Celebrate Weekends with**

**MasterCard(R) 7/1-9/30/03!**  
 Every time you use your Citi(R) Diamond Preferred(SM) Entertainment Card, you're closer to enjoying great rewards. No purchase necessary. For complete details visit [www.mastercard.com/citibank/sweepstakes](http://www.mastercard.com/citibank/sweepstakes) today!

Even when all is well, protection is good to have. Call 1-866-465-5007 for information on how you can protect your Citi Card account if your income is interrupted!

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596000547005475106

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By

09/11/03

Your Total Balance

\$5.47

Minimum Amount Due

\$5.47

\$

2N MC 00 A 1 AR7321221

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411

July 17 - August 18, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596  
 Statement/Closing Date: 08/18/03

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	08/04	PAYMENT THANK YOU	14259477 \$2,408.80CR
<b>Total Payments and Adjustments</b>			<b>\$2,408.80CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 5	4.900%	.01342%(D)	x	32	x	\$1,274.48	=	\$5.47	+	\$0.00	=	4.900%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>											<b>=</b>	<b>\$5.47</b>

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Welcome to Entertainment Rewards! Use your Citi Diamond Preferred Entertainment Card for all of your everyday purchases and watch the points add up!

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi Diamond Preferred Entertainment Card

August 18 - September 17, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 09/17/03

### Quick Reference

Minimum Payment	0.00
Payment Due Date*	NONE DUE
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	24,590.00
Available Credit Line	24,590.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

### Account Summary

Previous Balance	5.47
Payments and Adjustments	5.47
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	0.00
<b>New Balance</b>	<b>\$0.00</b>

### Purchase Categories

Total Purchases	\$0.00
-----------------	--------

### How to Reach Us

www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

### Cardmember News

How will you pay your Citi Card bill if something unexpected happens? Call us at 1-866-631-0344. We can help!

### Questions about credit in Spanish? Para Informacion

sobre como utilizar su credito responsablemente, en Espanol, visite [www.CuidaTuCredito.com](http://www.CuidaTuCredito.com)

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

054241810313825960000000000005205

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

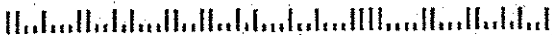
Payment Must Be Received By  
**NONE DUE**

Your Total Balance  
**\$0.00**

Minimum Amount Due  
**\$0.00**

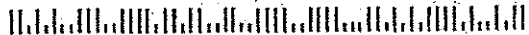
\$

3N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



August 18 - September 17, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596  
 Statement/Closing Date: 09/17/03

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	09/08	PAYMENT THANK YOU	14437145 \$5.47CR
<b>Total Payments and Adjustments</b>			<b>\$5.47CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>											
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	8.900%
Offer 5	4.900%	.01342%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	4.900%
<b>CASH ADVANCES</b>											
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
<b>Total FINANCE CHARGE</b>								<b>=</b>	<b>\$0.00</b>		

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

September 17 - October 17, 2003

Page 1 of 2

MIRIAM G CARROLL  
Account 5424 1810 3138 2596

Statement/Closing Date: 10/17/03

**How to Reach Us**  
www.citicards.com  
Citibank Customer Service Ctr  
BOX 6000  
THE LAKES, NV 89163-6000  
1-866-380-5413

## Quick Reference

Minimum Payment	0.00
Payment Due Date*	NONE DUE
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	24,590.00
Available Credit Line	24,590.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

## Account Summary

Previous Balance	0.00
Payments and Adjustments	0.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	0.00
<b>New Balance</b>	<b>\$0.00</b>

## Purchase Categories

Total Purchases	\$0.00
-----------------	--------

date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

054241810313825960000000000005205

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

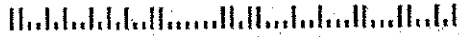
Payment Must Be Received By  
**NONE DUE**

Your Total Balance  
**\$0.00**

Minimum Amount Due  
**\$0.00**

\$

4N MC OD A 1 AR7321221



MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID 83536-9410

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV 88901-6411



1676



**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

Safe Date	Post Date	Activity	Amount
Total Purchases			\$0.00

**Cash Advances**

Safe Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
PURCHASES											
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	8.900%
CASH ADVANCES											
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
							Total FINANCE CHARGE	=	\$0.00		

# Citi Diamond Preferred Entertainment Card

October 17 - November 17, 2003  
MIRIAM G CARROLL  
Account 5424 1810 3138 2596

Statement/Closing Date: 11/17/03

**How to Reach Us**  
www.citicards.com  
Citibank Customer Service Ctr  
BOX 6000  
THE LAKES, NV 89163-6000  
1-866-380-5413

### Quick Reference

Minimum Payment	0.00
Payment Due Date*	NONE DUE
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	24,590.00
Available Credit Line	24,590.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

### Account Summary

Previous Balance	0.00
Payments and Adjustments	0.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	0.00
<b>New Balance</b>	<b>\$0.00</b>

### Purchase Categories

Total Purchases	\$0.00
-----------------	--------

date paid      amount paid      check #

\_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596000000000005205

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

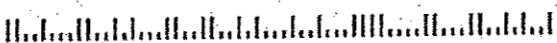
Payment Must Be Received By  
**NONE DUE**

Your Total Balance  
**\$0.00**

Minimum Amount Due  
**\$0.00**

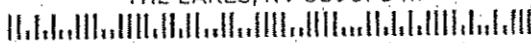
**\$**

SN MC 00 A 1 AR7321221



MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID 83536-9410

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV 88901-6411



**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

Safe Date	Post Date	Activity	Amount
Total Purchases			\$0.00

**Cash Advances**

Safe Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
PURCHASES											
Standard Purch	8.900%	.02438%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	8.900%
CASH ADVANCES											
Standard Adv	19.990%	.05477%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
Total FINANCE CHARGE							=	\$0.00			

# Citi® Diamond Preferred Entertainment Card

November 17 - December 17, 2003  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 12/17/03

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

Minimum Payment	0.00
Payment Due Date*	NONE DUE
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
Total Credit Line	24,590.00
Available Credit Line	24,590.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	5,000.00

**Account Summary**

Previous Balance	0.00
Payments and Adjustments	0.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	0.00
<b>New Balance</b>	<b>\$0.00</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596000000000005205

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

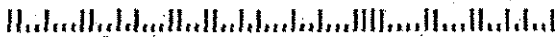
Payment Must Be Received By  
**NONE DUE**

Your Total Balance  
**\$0.00**

Minimum Amount Due  
**\$0.00**

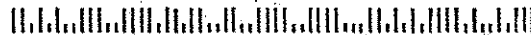
\$

6N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1680

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

Sale Date	Post Date	Activity	Amount
Total Purchases			\$0.00

**Cash Advances**

Sale Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
PURCHASES											
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	8.900%
CASH ADVANCES											
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
Total FINANCE CHARGE								=	\$0.00		

# Citi® Diamond Preferred Entertainment Card

December 17 - January 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 01/16/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

Minimum Payment **257.00**  
 Payment Due Date\* **February 5, 2004**  
\*Payment must be received by 1:00 pm local time on the payment due date.  
 \*Payment must be received by 1:00 pm local time on the payment due date.  
 Total Credit Line **25,090.00**  
 Available Credit Line **12,746.00**  
 Cash Advance Limit **5,000.00**  
 Available Cash Advance Limit **5,000.00**

**Account Summary**

Previous Balance 0.00  
 Payments and Adjustments 0.00  
 Purchases 12,300.00  
 Cash Advances 0.00  
 Fees & Finance Charges 43.79  
**New Balance \$12,343.79**

**Purchase Categories**

Miscellaneous \$12,300.00  
 Total Purchases \$12,300.00

**Cardmember News**

**CASH WHEN YOU NEED IT** - It's easier than ever to get cash, up to your available Cash Advance Limit. Tear off the attached check, deposit it into your bank account, or use it like any personal check. Convenience Checks access the cash advance portion of your credit line. Refer to your Citibank Card Agreement for specific finance charges.

**Peace of mind is knowing...**

your Citi Card account is protected if your income stops. Call 1-866-606-6586 to find out how you can be protected. Receive a \$15 rebate coupon when you enroll.

**Introducing Citi(R) Identity Theft Solutions**

Identity theft can happen to anyone. If it happens to you we can help with free specialized assistance. Visit <https://www.citicards.com> to learn more.

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999257005201

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

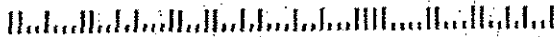
Payment Must Be Received By  
**02/05/04**

Your Total Balance  
**\$12,343.79**

Minimum Amount Due  
**\$257.00**

\$

7N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411

1682

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

**Miscellaneous**

Balance Transfer - Charged To Offer 5			
Sale Date	Post Date	Activity	Amount
12/22	12/22	BAL XFER MBNA AMERICA	83610933 \$12,300.00
Total Miscellaneous			\$12,300.00
Total Purchases			\$12,300.00

**Cash Advances**

Sale Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>											
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	8.900%
Offer 5	4.990%	.01367%(D)	x	30	x	\$10,678.24	=	\$43.79	+	\$0.00	4.990%
<b>CASH ADVANCES</b>											
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
								Total FINANCE CHARGE	=	\$43.79	

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

January 16 - February 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 02/16/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	<b>513.00</b>
<b>Payment Due Date*</b>	<b>March 8, 2004</b>
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
Total Credit Line	25,090.00
Available Credit Line	443.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	443.00

**Cardmember News**

**IMPORTANT PROGRAM INFORMATION:**  
 MasterCard renewed their insurance coverage with Virginia Surety Company, extending Purchase Assurance, Extended Warranty and MasterRental through January 31, 2005.

**Account Summary**

Previous Balance	12,343.79
Payments and Adjustments	260.00
Purchases	12,500.00
Cash Advances	0.00
Fees & Finance Charges	62.69
<b>New Balance</b>	<b>\$24,646.48</b>

**Did you know?**

Your Citi Card can provide shopping convenience and account protection. Call 1-866-284-4428 to learn how to protect your account and receive a \$15 rebate coupon when you enroll.

**Purchase Categories**

Miscellaneous	\$12,500.00
<b>Total Purchases</b>	<b>\$12,500.00</b>

date paid	amount paid	check #
_____	_____	_____

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999513005300

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 03/08/04

Your Total Balance  
 \$24,646.48

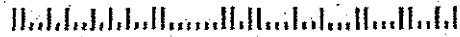
Minimum Amount Due  
 \$513.00

\$ \_\_\_\_\_

BN MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410



CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411





**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	02/02	PAYMENT THANK YOU	13418137 \$260.00CR
<b>Total Payments and Adjustments</b>			<b>\$260.00CR</b>

**Purchases**

**Miscellaneous**

Balance Transfer - Charged To Offer 4			
Safe Date	Post Date	Activity	Amount
02/12	02/12	BAL XFER CHECK # 1087	10075423 \$4,000.00
Balance Transfer - Charged To Offer 5			
Safe Date	Post Date	Activity	Amount
02/11	02/11	BAL XFER MBNA AMERICA	B3612905 \$3,000.00
02/11	02/11	BAL XFER DISCOVER	B3612906 \$5,500.00
<b>Total Miscellaneous</b>			<b>\$12,500.00</b>
<b>Total Purchases</b>			<b>\$12,500.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	31	x	\$645.41	=	\$3.83	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	31	x	\$13,888.93	=	\$58.86	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>											<b>=</b>	<b>\$62.69</b>

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi Diamond Preferred Entertainment Card

February 16 - March 16, 2004

Page 1 of 2

MIRIAM G CARROLL  
Account 5424 1810 3138 2596

Statement/Closing Date: 03/16/04

**How to Reach Us**  
www.citicards.com  
Citibank Customer Service Ctr  
BOX 6000  
THE LAKES, NV 89163-6000  
1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	504.00
<b>Payment Due Date*</b>	April 9, 2004
*Payment must be received by 100 pm local time on the payment due date.	
*Payment must be received by 100 pm local time on the payment due date.	
<b>Total Credit Line</b>	25,090.00
<b>Available Credit Line</b>	860.00
<b>Cash Advance Limit</b>	5,000.00
<b>Available Cash Advance Limit</b>	860.00

**Cardmember News**  
**FREE SERVICES FOR CITI CARDMEMBERS**  
Manage your Citi card account online securely, anytime - whether you want to check your balance, see if a payment was received or pay your bill. Register now at www.citicards.com

**Account Summary**

Previous Balance	24,646.48
Payments and Adjustments	520.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	103.14
<b>New Balance</b>	<b>\$24,229.62</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

date paid      amount paid      check #

\_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999504005400

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

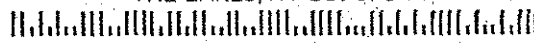
Payment Must Be Received By 04/09/04	Your Total Balance \$24,229.62	Minimum Amount Due \$504.00	\$
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9N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID 83536-9410

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV 88901-6411



1686

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	03/01	PAYMENT THANK YOU	14330723 \$520.00CR
<b>Total Payments and Adjustments</b>			<b>\$520.00CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	29	x	\$4,012.47	=	\$22.28	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	29	x	\$20,397.13	=	\$80.86	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>											<b>=</b>	<b>\$103.14</b>

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi<sup>®</sup> Diamond Preferred Entertainment Card

March 16 - April 15, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Statement/Closing Date: 04/15/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

Minimum Payment	496.00
Payment Due Date*	May 10, 2004
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	25,090.00
Available Credit Line	1,275.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	1,275.00

**Account Summary**

Previous Balance	24,229.62
Payments and Adjustments	520.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	104.68
<b>New Balance</b>	<b>\$23,814.30</b>

**Purchase Categories**

Total Purchases	\$0.00
-----------------	--------

**Cardmember News**

Your current nominal annual percentage rate for purchases may vary monthly and is based on the Wall Street Journal Prime Rate plus 4.900%. However, if you default on any Card Agreement, your rate may increase. The new rate will be up to 24.990%. These rates apply to your account at the time this statement was printed.

**Did you know?**

Your Citi Card can provide shopping convenience and account protection. Call 1-877-436-2674 to learn how to protect your account and receive a \$20 rebate coupon when you enroll.

**FREE SERVICES FOR CITI CARDMEMBERS**

Receive your statement online only when you enroll in our All-Electronic program when you register for account online. Also, manage your account, pay bills and more! Register now at www.citicards.com

date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999496005509

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 05/10/04

Your Total Balance  
 \$23,814.30

Minimum Amount Due  
 \$496.00

\$

10N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410



CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	03/26	PAYMENT THANK YOU	13853613 \$520.00CR
<b>Total Payments and Adjustments</b>			<b>\$520.00CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Fees & Finance Charges**

Standard Purch	Safe Date	Post Date	Activity	Amount
		04/15	MEMBERSHIP FEE APR 04-MAR 05	\$0.00
<b>Total Fees &amp; Finance Charges</b>				<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	30	x	\$4,017.84	=	\$23.08	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	30	x	\$19,898.56	=	\$81.60	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>											<b>=</b>	<b>\$104.68</b>

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

April 15 - May 17, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 05/17/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

Minimum Payment	488.00
Payment Due Date*	June 10, 2004
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	25,090.00
Available Credit Line	1,665.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	1,665.00

**Cardmember News**

If you have not received your new card, please call the Customer Service number on this statement.

Please note that payments must be received by 1:00 p.m., local time, on a bank business day at the payment processing facility that handles your payments, in order to be credited to your account as of that day, and payments must conform to the payment instructions set forth on the reverse side. All conforming payments received at the payment processing facility after that time will be credited as of the following bank business day.

**Account Summary**

Previous Balance	23,814.30
Payments and Adjustments	500.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	110.23
<b>New Balance</b>	<b>\$23,424.53</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

Our records show home phone 208-935-7962 and business phone 208-926-4372. Please update coupon if incorrect.

**How will you pay your Citi Card bill**  
 if something unexpected happens? Call us at 1-877-436-2678. We can help!

date paid	amount paid	check #
-----------	-------------	---------

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999488005608

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
06/10/04

Your Total Balance  
\$23,424.53

Minimum Amount Due  
\$488.00

\$

11N MC 00 A 1 ART321221

MIRIAM G CARROLL  
 HC1 BOX 366  
 KAMIAH ID B3536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	04/30	PAYMENT THANK YOU	\$500.00CR
<b>Total Payments and Adjustments</b>			<b>\$500.00CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	32	x	\$4,022.04	=	\$24.65	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	32	x	\$19,564.63	=	\$85.58	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>										<b>=</b>	<b>\$110.23</b>	

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

May 17 - June 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 06/16/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

**Minimum Payment** 479.00  
**Payment Due Date\*** July 12, 2004  
\*Payment must be received by 1:00 pm local time on the payment due date.  
\*Payment must be received by 1:00 pm local time on the payment due date.  
**Total Credit Line** 25,090.00  
**Available Credit Line** 2,063.00  
**Cash Advance Limit** 5,000.00  
**Available Cash Advance Limit** 2,063.00

**Account Summary**

Previous Balance 23,424.53  
 Payments and Adjustments 500.00  
 Purchases 0.00  
 Cash Advances 0.00  
 Fees & Finance Charges 101.72  
**New Balance \$23,026.25**

**Purchase Categories**

**Total Purchases \$0.00**

date paid      amount paid      check #

\_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999479005708

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

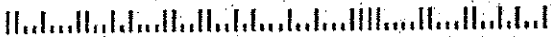
Payment Must Be Received By  
 07/12/04

Your Total Balance  
 \$23,026.25

Minimum Amount Due  
 \$479.00

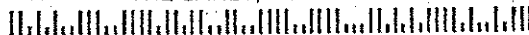
\$ \_\_\_\_\_

12N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411





**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	05/31	PAYMENT THANK YOU	13738561 \$500.00CR
<b>Total Payments and Adjustments</b>			<b>\$500.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	30	x	\$4,021.86	=	\$23.11	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	30	x	\$19,168.72	=	\$78.61	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>										<b>=</b>	<b>\$101.72</b>	

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi<sup>®</sup> Diamond Preferred Entertainment Card

June 16 - July 16, 2004

Page 1 of 2

MIRIAM G CARROLL  
Account 5424 1810 3138 2596

Statement/Closing Date: 07/16/04

**How to Reach Us**  
www.citicards.com  
CitiBank Customer Service Ctr  
BOX 6000  
THE LAKES, NV 89163-6000  
1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	<b>471.00</b>
<b>Payment Due Date*</b>	<b>August 10, 2004</b>
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
Total Credit Line	25,090.00
Available Credit Line	2,442.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	2,442.00

**Cardmember News**

Please see the enclosed privacy notice for important information.

Is your account protected if something unexpected happens? Call us at 1-866-247-0638. We can help!

**Account Summary**

Previous Balance	23,026.25
Payments and Adjustments	480.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	100.92
<b>New Balance</b>	<b>\$22,647.17</b>

**Purchase Categories**

Total Purchases	\$0.00
-----------------	--------

date paid      amount paid      check #

Please follow payment instructions outlined in the "important instructions for making payments" section of the statement.

05424181031382596999999471005805

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
**08/10/04**

Your Total Balance  
**\$22,647.17**

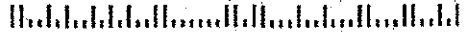
Minimum Amount Due  
**\$471.00**

**\$**

13N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID 83536-9410



CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV 88901-6411



1694

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
	07/12	PAYMENT THANK YOU	13022685 \$480.00CR
<b>Total Payments and Adjustments</b>			<b>\$480.00CR</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	30	x	\$4,030.45	=	\$23.15	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	30	x	\$18,964.69	=	\$77.77	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
								<b>Total FINANCE CHARGE</b>	<b>=</b>	<b>\$100.92</b>		

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

July 16 - August 17, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 08/17/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	464.00
<b>Payment Due Date*</b>	September 10, 2004
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	25,090.00
Available Credit Line	2,812.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	2,812.00

**Account Summary**

Previous Balance	22,647.17
Payments and Adjustments	475.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	105.31
<b>New Balance</b>	<b>\$22,277.48</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999464005903

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

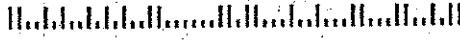
Payment Must Be Received By  
 09/10/04

Your Total Balance  
 \$22,277.48

Minimum Amount Due  
 \$464.00

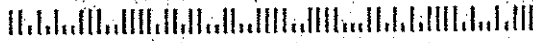
\$

14N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



July 16 - August 17, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596  
 Statement/Closing Date: 08/17/04

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	08/02	PAYMENT THANK YOU	\$475.00CR
<b>Total Payments and Adjustments</b>			<b>\$475.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	8.900%	.02438%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	8.900%
Offer 4	6.990%	.01915%(D)	x	32	x	\$4,023.52	=	\$24.66	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	32	x	\$18,437.38	=	\$80.65	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>										<b>=</b>	<b>\$105.31</b>	

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi<sup>®</sup> Diamond Preferred Entertainment Card

August 17 - September 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 09/16/04

### Quick Reference

Minimum Payment	456.00
Payment Due Date*	October 11, 2004
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	25,090.00
Available Credit Line	3,180.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	3,180.00

### Account Summary

Previous Balance	22,277.48
Payments and Adjustments	465.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	97.47
<b>New Balance</b>	<b>\$21,909.95</b>

### Purchase Categories

Total Purchases	\$0.00
-----------------	--------

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Cardmember News**  
**IMPORTANT INFORMATION ABOUT CREDIT REPORTING:**  
 WE MAY REPORT INFORMATION ABOUT YOUR ACCOUNT TO CREDIT BUREAUS. LATE PAYMENTS, MISSED PAYMENTS, OR OTHER DEFAULTS ON YOUR ACCOUNT MAY BE REFLECTED IN YOUR CREDIT REPORT.

Is your account protected if something unexpected happens? Call us at 1-866-247-0360. We can help!

**FREE SERVICES FOR CITI CARDMEMBERS**  
 Manage your Citi Card account online securely, anytime-whether you want to check your balance, see if a payment was received or pay your bill. Register now at www.citicards.com

Save Time. Save Paper. Sign up for **All-Electronic**. You'll have instant access to your statement online, without that pile of paper. Get an e-mail notice when your statement is ready. Register or sign-on to citicards.com and choose Manage My Account.

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999456005911

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By

10/11/04

Your Total Balance

\$21,909.95

Minimum Amount Due

\$456.00

\$

15N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410



CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1698

August 17 - September 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596  
 Statement/Closing Date: 09/16/04

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	09/06	PAYMENT THANK YOU	14324107 \$465.00CR
<b>Total Payments and Adjustments</b>			<b>\$465.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	9.150%	.02507%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	9.150%
Offer 4	6.990%	.01915%(D)	x	30	x	\$4,026.80	=	\$23.13	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	30	x	\$18,127.48	=	\$74.34	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
								<b>Total FINANCE CHARGE</b>	<b>=</b>	<b>\$97.47</b>		

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi Diamond Preferred Entertainment Card

September 16 - October 18, 2004

Page 1 of 2

MIRIAM G CARROLL  
Account 5424 1810 3138 2596

Statement/Closing Date: 10/18/04

**How to Reach Us**  
www.citicards.com  
Citibank Customer Service Ctr  
BOX 6000  
THE LAKES, NV 89163-6000  
1-866-380-5413

## Quick Reference

<b>Minimum Payment</b>	449.00
<b>Payment Due Date*</b>	November 10, 2004
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
<b>Total Credit Line</b>	25,090.00
<b>Available Credit Line</b>	3,497.00
<b>Cash Advance Limit</b>	5,000.00
<b>Available Cash Advance Limit</b>	3,497.00

## Account Summary

<b>Previous Balance</b>	21,909.95
<b>Payments and Adjustments</b>	456.00
<b>Purchases</b>	0.00
<b>Cash Advances</b>	0.00
<b>Fees &amp; Finance Charges</b>	103.07
<b>New Balance</b>	\$21,592.02

## Purchase Categories

<b>Total Purchases</b>	\$0.00
------------------------	--------

## Cardmember News

The 1-800 Gift Certificate feature has been discontinued as of October 21, 2004.

**Is your account protected if something unexpected happens?** Call us at 1-866-393-0847. We can help!

**Save Time. Save Paper. Sign up for All-Electronic.**

You'll have instant access to your statement online, without that pile of paper. Get an e-mail notice when your statement is ready. Register or sign-on to citicards.com and choose Manage My Account.

**FREE SERVICES FOR CITI CARDMEMBERS**  
Manage your Citi card account online securely, anytime-whether you want to check your balance, see if a payment was received or pay your bill. Register now at www.citicards.com

date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999449005911

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
11/10/04

Your Total Balance  
\$21,592.02

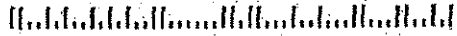
Minimum Amount Due  
\$449.00

\$

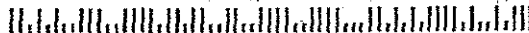
16N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH ID 83536-9410



CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV 88901-6411



1700



September 16 - October 18, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596  
 Statement/Closing Date: 10/18/04

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	10/18	PAYMENT THANK YOU	34538687 \$456.00CR
<b>Total Payments and Adjustments</b>			<b>\$456.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Fees & Finance Charges**

Standard Purch				Amount
Sale Date	Post Date	Activity		
	10/18	LATE FEE - SEP PAYMENT PAST DUE		\$35.00
<b>Total Fees &amp; Finance Charges</b>				<b>\$35.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>											
Standard Purch	9.400%	.02575%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	9.400%
Offer 4	6.990%	.01915%(D)	x	32	x	\$4,034.37	=	\$24.72	+	\$0.00	6.990%
Offer 5	4.990%	.01367%(D)	x	32	x	\$17,911.24	=	\$78.35	+	\$0.00	4.990%
<b>CASH ADVANCES</b>											
Standard Adv	19.990%	.05477%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	19.990%
<b>Total FINANCE CHARGE</b>								<b>=</b>	<b>\$103.07</b>		

**Rewards**

**\* CITI ENTERTAINMENT REWARDS SUMMARY \***

Previous Points Balance.....	2,090
Purchase Points Earned Last Period.....	0
Points Redeemed/Expired.....	0
Points Adjustment/Bonus Points.....	0
<b>Total Points.....</b>	<b>2,090</b>

Don't forget! Your Citi Diamond Preferred Entertainment Card is the card that rewards you for all of your everyday purchases. Use your card and earn Entertainment Points for new purchases. See our website, [www.entertainmentrewards.citicards.com](http://www.entertainmentrewards.citicards.com) or call 1-800-363-6246 for more information!

# Citi® Diamond Preferred Entertainment Card

October 18 - November 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 3

Statement/Closing Date: 11/16/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

<b>Minimum Payment</b>	<b>442.00</b>
<b>Payment Due Date*</b>	<b>December 10, 2004</b>
*Payment must be received by 1:00 pm local time on the payment due date.	
*Payment must be received by 1:00 pm local time on the payment due date.	
Total Credit Line	25,090.00
Available Credit Line	3,856.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	3,856.00

**Account Summary**

Previous Balance	21,592.02
Payments and Adjustments	450.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	91.32
<b>New Balance</b>	<b>\$21,233.34</b>

**Purchase Categories**

Total Purchases	\$0.00
-----------------	--------

**ThankYou Redemptions Network**

Total ThankYou Points.....	2,090
----------------------------	-------

Log on to our website at [www.thankyouredemptions.com](http://www.thankyouredemptions.com) where rewarding yourself has never been easier. You can review your ThankYou Points balance, browse our redemption collection, and even redeem online!

**Cardmember News**

Our records show home phone 208-935-7962 and business phone 208-926-4372. Please update coupon if incorrect.

**Life Happens. But bills like this don't have to.** When life-changing events interrupt your income or strain your budget, Credit Protector gives you some breathing room when it comes to your account payments. To enroll, call 1-866-885-1229.

**IMPORTANT PROGRAM INFORMATION:  
 Exciting News!**

We are upgrading your rewards program in November with more ways to earn and redeem. The name is changing to ThankYou Redemptions Network(SM). Look for details and new terms and conditions in the mail.

**Save Time. Save Paper. Sign up for All-Electronic.**

You'll have instant access to your statement online, without that pile of paper. Get an e-mail notice when your statement is ready. Register or sign-on to [citicards.com](http://citicards.com) and choose Manage My Account.

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

0542418103138259699999442005918

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 12/10/04

Your Total Balance  
 \$21,233.34

Minimum Amount Due  
 \$442.00

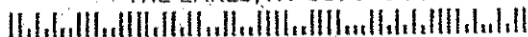
\$

17N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HCU BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1702

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	11/01	PAYMENT THANK YOU	17212076 \$450.00CR
<b>Total Payments and Adjustments</b>			<b>\$450.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	9.650%	.02644%(D)	x	29	x	\$35.13	=	\$0.27	+	\$0.00	=	9.650%
Offer 4	6.990%	.01915%(D)	x	29	x	\$4,021.87	=	\$22.34	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	29	x	\$17,331.02	=	\$68.71	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>										<b>=</b>	<b>\$91.32</b>	

**Rewards**

\*\*\*\*ThankYou Points Summary\*\*\*\*

Previous Statement Point Total.....	2,090
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total ThankYou Points Available.....	2,090
Lifetime ThankYou Points Earned.....	2,090

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

October 18 - November 16, 2004  
MIRIAM G CARROLL  
Account 5424 1810 3138 2596  
Statement/Closing Date: 11/16/04

Page 3 of 3

**FREE SERVICES FOR CITI CARDMEMBERS**

Manage your Citi card account online securely, anytime-whether you want to check your balance, see if a payment was received or pay your bill. Register now at [www.citicards.com](http://www.citicards.com)

# Citi® Diamond Preferred Entertainment Card

November 16 - December 16, 2004  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 12/16/04

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

Minimum Payment	435.00
Payment Due Date*	January 10, 2005
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
Total Credit Line	25,090.00
Available Credit Line	4,205.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	4,205.00

**Account Summary**

Previous Balance	21,233.34
Payments and Adjustments	442.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	92.96
<b>New Balance</b>	<b>\$20,884.30</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

**ThankYou Redemptions Network**

Total ThankYou Points.....	2,090
----------------------------	-------

Log on to our website at [www.thankyouredemptions.com](http://www.thankyouredemptions.com) where rewarding yourself has never been easier. You can review your ThankYou Points balance, browse our redemption collection, and even redeem online!

**Cardmember News**

**KEEP TRACK OF YOUR HOLIDAY SPENDING**  
 Stay on top of your purchases and available credit on your Citi card this holiday season. Register at [citicards.com](http://citicards.com) today and view your account summary, anytime, anywhere.

date paid      amount paid      check #  
 \_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999435005917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 01/10/05

Your Total Balance  
 \$20,884.30

Minimum Amount Due  
 \$435.00

\$

18N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
	11/29	PAYMENT THANK YOU	36366296 \$442.00CR
<b>Total Payments and Adjustments</b>			<b>\$442.00CR</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	10.990%	.03011%(D)	x	30	x	\$35.26	=	\$0.32	+	\$0.00	=	10.990%
Offer 4	6.990%	.01915%(D)	x	30	x	\$4,020.10	=	\$23.10	+	\$0.00	=	6.990%
Offer 5	4.990%	.01367%(D)	x	30	x	\$16,957.89	=	\$69.54	+	\$0.00	=	4.990%
<b>CASH ADVANCES</b>												
Standard Adv	19.990%	.05477%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	=	19.990%
<b>Total FINANCE CHARGE</b>										<b>=</b>	<b>\$92.96</b>	

**Rewards**

\*\*\*\*ThankYou Points Summary\*\*\*\*

Previous Statement Point Total.....	2,090
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total ThankYou Points Available.....	2,090
Lifetime ThankYou Points Earned.....	2,090

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

# Citi® Diamond Preferred Entertainment Card

December 16 - January 17, 2005  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 3

Statement/Closing Date: 01/17/05

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-866-380-5413

**Quick Reference**

**Minimum Payment** 982.07  
**Payment Due Date\*** February 9, 2005

\*Payment must be received by 1:00 pm local time on the payment due date.

**Amount Past Due** 435.00  
**Amount Past Due**  
 Total Credit Line 25,090.00  
 Available Credit Line 3,624.00  
 Cash Advance Limit 5,000.00  
 Available Cash Advance Limit 3,624.00

**Account Summary**

Previous Balance 20,884.30  
 Payments and Adjustments 0.00  
 Purchases 0.00  
 Cash Advances 0.00  
 Fees & Finance Charges 542.07  
**New Balance \$21,465.37**

**Purchase Categories**

**Total Purchases \$0.00**

**ThankYou Redemptions Network**

Total ThankYou Points..... 2,090

Log on to our website at  
 www.thankyouredemptions.com where rewarding  
 yourself has never been easier. You can review  
 your ThankYou Points balance, browse our  
 redemption collection, and even redeem online!

**Cardmember News**

Your late fee was based on your account balance as of the payment due date (01/10/05), which was \$20,884.30.

The Annual Percentage Rate on your account has been increased due to one of the following reasons stated in your Card Agreement with us: you failed to make a payment to us or any other creditor when due, you exceeded your credit line or you made a payment to us that was not honored by your bank.

Your account is past due. In order to redeem or continue earning ThankYou Points, please send the Minimum Payment Due. If your payment has already been sent, we appreciate it.

We are pleased to inform you that the current base benefits on your MasterCard(R) have been extended through September 1, 2005. For further information on the benefits you can access as a cardholder, please call 1-800-MC-ASSIST.

date paid      amount paid      check #  
 \_\_\_\_\_

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999982075917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 02/09/05

Your Total Balance  
 \$21,465.37

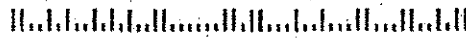
Minimum Amount Due  
 \$982.07

\$

19N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410



CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1707

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

Sale Date	Post Date	Activity	Amount
Total Purchases			\$0.00

**Cash Advances**

Sale Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Fees & Finance Charges**

Standard Purch	Sale Date	Post Date	Activity	Amount
		01/17	LATE FEE - DEC PAYMENT PAST DUE	\$39.00
Total Fees & Finance Charges				\$39.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
PURCHASES											
Standard Purch	29.240%	.08011%(D)	x	32	x	\$35.76	=	\$0.92	+	\$0.00	29.240%
Offer 4	29.240%	.08011%(D)	x	32	x	\$4,073.46	=	\$104.42	+	\$0.00	29.240%
Offer 5	29.240%	.08011%(D)	x	32	x	\$17,036.49	=	\$436.73	+	\$0.00	29.240%
CASH ADVANCES											
Standard Adv	29.240%	.08011%(D)	x	32	x	\$0.00	=	\$0.00	+	\$0.00	29.240%
Total FINANCE CHARGE										=	\$542.07

**Rewards**

\*\*\*\*Thank You Points Summary\*\*\*\*

Previous Statement Point Total.....	2,090
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total Thank You Points Available.....	2,090
Lifetime Thank You Points Earned.....	2,090

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.



December 16 - January 17, 2005  
MIRIAM G CARROLL  
Account 5424 1810 3138 2596  
Statement/Closing Date: 01/17/05

Page 3 of 3

**Life Happens. But bills like this don't have to.**

When life-changing events interrupt your income or strain your budget, Credit Protector gives you some breathing room when it comes to your account payments. To enroll, call 1-866-463-8060.

**FREE SERVICES FOR CITI CARDMEMBERS**

Manage your Citi Card account online securely, anytime - whether you want to check your balance, see if a payment was received or pay your bill. Register now at [citicards.com](http://citicards.com)

# Citi® Diamond Preferred Entertainment Card

January 17 - February 15, 2005  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 02/15/05

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-800-388-2200

**Quick Reference**

**Minimum Payment** 1,495.72  
**Payment Due Date\*** March 11, 2005  
\*Payment must be received by 1:00 pm local time on the payment due date.

**Amount Past Due** 982.07  
**Amount Past Due**  
 Total Credit Line 22,100.00  
 Available Credit Line 86.00  
 Cash Advance Limit 5,000.00  
 Available Cash Advance Limit 86.00

**Account Summary**

Previous Balance 21,465.37  
 Payments and Adjustments 0.00  
 Purchases 0.00  
 Cash Advances 0.00  
 Fees & Finance Charges 508.65  
**New Balance** \$22,013.02

**Purchase Categories**

**Total Purchases** \$0.00

**ThankYou Redemptions Network**

**Total ThankYou Points** 2,090

Log on to our website at [www.thankyouredemptions.com](http://www.thankyouredemptions.com) where rewarding yourself has never been easier. You can review your ThankYou Points balance, browse our redemption collection, and even redeem online!

**Cardmember News**

Your late fee was based on your account balance as of the payment due date (02/09/05), which was \$21,465.37.

Since your account is past due, your credit privileges have been suspended. In order to redeem or continue earning ThankYou Points, please pay the Minimum Payment Due. If your payment has already been sent, we appreciate it.

**Important Information About Your Account**

Please see the enclosed Notice of Change in Terms to Your Card Agreement for important information regarding changes to your Card Agreement.

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999999995917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By

03/11/05

Your Total Balance

\$22,013.02

Minimum Amount Due

\$1,495.72

\$

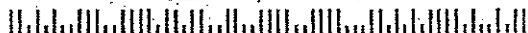
20N MC 00 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410



CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



1710

**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
<b>Total Payments and Adjustments</b>			<b>\$0.00</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Fees & Finance Charges**

Standard Purch				Amount
Safe Date	Post Date	Activity		
	02/15	LATE FEE - JAN PAYMENT PAST DUE		\$39.00
<b>Total Fees &amp; Finance Charges</b>				<b>\$39.00</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>											
Standard Purch	29.490%	.08079%(D)	x	29	x	\$76.10	=	\$1.78	+	\$0.00	29.490%
Offer 4	29.490%	.08079%(D)	x	29	x	\$4,174.55	=	\$97.81	+	\$0.00	29.490%
Offer 5	29.490%	.08079%(D)	x	29	x	\$17,459.29	=	\$409.06	+	\$0.00	29.490%
<b>CASH ADVANCES</b>											
Standard Adv	29.490%	.08079%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	29.490%
							<b>Total FINANCE CHARGE</b>	<b>=</b>	<b>\$508.65</b>		

**Rewards**

\*\*\*\*Thank You Points Summary\*\*\*\*

Previous Statement Point Total.....	2,090
Base Points Earned.....	0
Total Points Earned This Period.....	0
Total Thank You Points Available.....	2,090
Lifetime Thank You Points Earned.....	2,090

Bonus Points may take one to two billing cycles to appear on your statement. Please refer to the specific terms and conditions pertaining to the promotion for further details.

# Citi® Diamond Preferred Entertainment Card

February 15 - March 17, 2005  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 03/17/05

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-800-866-9900

**Quick Reference**

Minimum Payment	2,532.40
Payment Due Date*	April 11, 2005
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
Amount Past Due	1,495.72
Amount Over Limit	491.85
Amount Over Limit	
Total Credit Line	22,100.00
Available Credit Line	0.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	0.00

**Cardmember News**

Your late fee was based on your account balance as of the payment due date (03/11/05), which was \$22,013.02.

Your account is now 3 MONTHS PAST DUE and currently closed. Please call the toll-free number to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time.

**Account Summary**

Previous Balance	22,013.02
Payments and Adjustments	0.00
Purchases	0.00
Cash Advances	0.00
Fees & Finance Charges	539.83
<b>New Balance</b>	<b>\$22,591.85</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
------------------------	---------------

date paid      amount paid      check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

05424181031382596999999999995917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 04/11/05

Your Total Balance  
 \$22,591.85

Minimum Amount Due  
 \$2,532.40

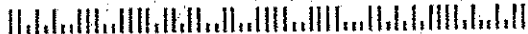
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21N MC 32 A 1 AR7321221



MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411



**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
Total Payments and Adjustments			\$0.00

**Purchases**

Sale Date	Post Date	Activity	Amount
Total Purchases			\$0.00

**Cash Advances**

Sale Date	Post Date	Activity	Amount
Total Cash Advances			\$0.00

**Fees & Finance Charges**

Standard Purch				Amount
Sale Date	Post Date	Activity		Amount
	03/17	LATE FEE - FEB PAYMENT PAST DUE		\$39.00
Total Fees & Finance Charges				\$39.00

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	ANNUAL PERCENTAGE RATE	
<b>PURCHASES</b>												
Standard Purch	29.490%	.08079%(D)	x	30	x	\$117.39	=	\$2.85	+	\$0.00	29.490%	
Offer 4	29.490%	.08079%(D)	x	30	x	\$4,275.20	=	\$103.62	+	\$0.00	29.490%	
Offer 5	29.490%	.08079%(D)	x	30	x	\$17,880.26	=	\$433.36	+	\$0.00	29.490%	
<b>CASH ADVANCES</b>												
Standard Adv	29.490%	.08079%(D)	x	30	x	\$0.00	=	\$0.00	+	\$0.00	29.490%	
Total								FINANCE CHARGE	=	\$539.83		

# Citi® Diamond Preferred Entertainment Card

March 17 - April 15, 2005  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Page 1 of 2

Statement/Closing Date: 04/15/05

**How to Reach Us**  
 www.citicards.com  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-800-866-9900

**Quick Reference**

Minimum Payment	23,205.81
Payment Due Date*	May 10, 2005
*Payment must be received by 1:00 pm local time on the payment due date.	
Amount Past Due	2,040.55
Amount Over Limit	1,105.81
Amount Over Limit	
Total Credit Line	22,100.00
Available Credit Line	0.00
Cash Advance Limit	5,000.00
Available Cash Advance Limit	0.00

**Cardmember News**

Your late fee was based on your account balance as of the payment due date (04/11/05), which was \$22,591.85.

Help is available! Please call the toll-free number to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

**Account Summary**

Previous Balance	22,591.85
Payments and Adjustments	0.00
Purchases	74.00
Cash Advances	0.00
Fees & Finance Charges	539.96
<b>New Balance</b>	<b>\$23,205.81</b>

**Purchase Categories**

Total Purchases	\$0.00
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date paid    amount paid    check #

Please follow payment instructions outlined in the "Important Instructions for Making Payments" section of the statement.

0542418103138259699999999999995917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 05/10/05

Your Total Balance  
 \$23,205.81

Minimum Amount Due  
 \$23,205.81

\$

22N MC 32 A 1 AR7321221

MIRIAM G CARROLL  
 HC11 BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411

**Payments and Adjustments**

Sale Date	Post Date	Activity	Amount
<b>Total Payments and Adjustments</b>			<b>\$0.00</b>

**Purchases**

Sale Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Sale Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Fees & Finance Charges**

Standard Purch			
Sale Date	Post Date	Activity	Amount
	04/15	LATE FEE - MAR PAYMENT PAST DUE	\$39.00
	04/15	OVER CREDIT LIMIT FEE	\$35.00
	04/15	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$3.77
Balance Transfer - Charged To Offer 4			
Sale Date	Post Date	Activity	Amount
	04/15	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$103.47
Balance Transfer - Charged To Offer 5			
Sale Date	Post Date	Activity	Amount
	04/15	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$432.72
<b>Total Fees &amp; Finance Charges</b>			<b>\$613.96</b>

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	29.740%	.08148%(D)	x	29	x	\$159.68	=	\$3.77	+	\$0.00	=	29.740%
Offer 4	29.740%	.08148%(D)	x	29	x	\$4,378.70	=	\$103.47	+	\$0.00	=	29.740%
Offer 5	29.740%	.08148%(D)	x	29	x	\$18,313.08	=	\$432.72	+	\$0.00	=	29.740%
<b>CASH ADVANCES</b>												
Standard Adv	29.740%	.08148%(D)	x	29	x	\$0.00	=	\$0.00	+	\$0.00	=	29.740%
<b>Total FINANCE CHARGE</b>								<b>=</b>	<b>\$539.96</b>			

# Citi® Diamond Preferred Entertainment Card

April 15 - May 16, 2005  
 MIRIAM G CARROLL  
 Account 5424 1810 3138 2596

Statement/Closing Date: 05/16/05

**How to Reach Us**  
[www.citicards.com](http://www.citicards.com)  
 Citibank Customer Service Ctr  
 BOX 6000  
 THE LAKES, NV 89163-6000  
 1-800-568-5000

**Quick Reference**

<b>Minimum Payment</b>	23,878.19
<b>Payment Due Date*</b>	June 10, 2005
<small>*Payment must be received by 1:00 pm local time on the payment due date.</small>	
<b>Amount Past Due</b>	2,585.51
<b>Amount Over Limit</b>	1,778.19
<b>Amount Over Limit</b>	
<b>Total Credit Line</b>	22,100.00
<b>Available Credit Line</b>	0.00
<b>Cash Advance Limit</b>	5,000.00
<b>Available Cash Advance Limit</b>	0.00

**Account Summary**

Previous Balance	23,205.81
Payments and Adjustments	0.00
Purchases	74.00
Cash Advances	0.00
Fees & Finance Charges	598.38
<b>New Balance</b>	<b>\$23,878.19</b>

**Purchase Categories**

<b>Total Purchases</b>	<b>\$0.00</b>
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**Cardmember News**

Your late fee was based on your account balance as of the payment due date (05/10/05), which was \$23,205.81.

Please note that payments must be received by 1:00 p.m., local time, on a bank business day at the payment processing facility that handles your payments, in order to be credited to your account as of that day, and payments must conform to the payment instructions set forth on the reverse side. All conforming payments received at the payment processing facility after that time will be credited as of the following bank business day.

Help is available! Please call the toll-free number to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Our records show home phone 208-935-7962 and business phone 208-926-4372. Please update coupon if incorrect.

date paid      amount paid      check #

\_\_\_\_\_

Please follow payment instructions outlined in the "Important instructions for Making Payments" section of the statement.

0542418103138259699999999999995917

Your Account Number

5424 1810 3138 2596

Please Enter Amount of Payment Enclosed

Payment Must Be Received By  
 06/10/05

Your Total Balance  
 \$23,878.19

Minimum Amount Due  
 \$23,878.19

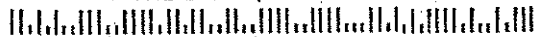
\$

23N MC 32 A 1 AR7321221



MIRIAM G CARROLL  
 HC# BOX 366  
 KAMIAH ID 83536-9410

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV 88901-6411





**Payments and Adjustments**

Safe Date	Post Date	Activity	Amount
<b>Total Payments and Adjustments</b>			<b>\$0.00</b>

**Purchases**

Safe Date	Post Date	Activity	Amount
<b>Total Purchases</b>			<b>\$0.00</b>

**Cash Advances**

Safe Date	Post Date	Activity	Amount
<b>Total Cash Advances</b>			<b>\$0.00</b>

**Fees & Finance Charges**

**Standard Purch**

Safe Date	Post Date	Activity	Amount
	05/16	LATE FEE - APR PAYMENT PAST DUE	\$39.00
	05/16	OVER CREDIT LIMIT FEE	\$35.00
	05/16	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$6.08

**Balance Transfer - Charged To Offer 4**

Safe Date	Post Date	Activity	Amount
	05/16	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$114.29

**Balance Transfer - Charged To Offer 5**

Safe Date	Post Date	Activity	Amount
	05/16	PURCHASES*FINANCE CHARGE*PERIODIC RATE	\$478.01

**Total Fees & Finance Charges** **\$672.38**

**Finance Charge Information**

	Nominal APR	Periodic Rate	x	Days in Billing Period	x	Balance Subject to Finance Charge	=	Periodic FINANCE CHARGE	+	Transaction Fee/FINANCE CHARGE	=	ANNUAL PERCENTAGE RATE
<b>PURCHASES</b>												
Standard Purch	29.990%	.08216%(D)	x	31	x	\$238.57	=	\$6.08	+	\$0.00	=	29.990%
Offer 4	29.990%	.08216%(D)	x	31	x	\$4,487.48	=	\$114.29	+	\$0.00	=	29.990%
Offer 5	29.990%	.08216%(D)	x	31	x	\$18,768.03	=	\$478.01	+	\$0.00	=	29.990%
<b>CASH ADVANCES</b>												
Standard Adv	29.990%	.08216%(D)	x	31	x	\$0.00	=	\$0.00	+	\$0.00	=	29.990%

Total FINANCE CHARGE = \$598.38

07/11/05 \$2,567.91 \$24567.91

SITE:KC-

TM:CO-5000  
05/11/06

ACID:KCC 1  
20: 54:

PMT DUE DATE    DED    MIN AMT DUE

MIRIAM G CARROLL  
HC11 BOX 366  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-756-4000	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
THE LAKES, NV	06/16/2005	\$2467.91	\$3188.89	\$620.72	\$24567.91
89163-6000					

Sale Date	Post Date	Category	Activity Since Last Statement	Amount
	6/16		Standard Purch	
			LATE FEE - MAY PAYMENT PAST DUE	39.00
	6/16		66 0000	0000000000
			OVER CREDIT LIMIT FEE	35.00
	6/16		62 0000	0000000000
			PURCHASES*FINANCE CHARGE*PERIODIC RATE	8.14
	6/16		84 0000	0000000000
			Balance Transfer - Charged To Offer 4	
	6/16		PURCHASES*FINANCE CHARGE*PERIODIC RATE	117.24
			84 0000	0000000000
			Balance Transfer - Charged To Offer 5	
	6/16		PURCHASES*FINANCE CHARGE*PERIODIC RATE	490.34
			84 0000	0000000000

Your late fee was based on your account balance as of the payment due date (06/10/05), which was \$23,878.19.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$23,878.19	\$74.00	\$0.00	\$615.72	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$23,878.19	\$74.00	\$0.00	\$615.72	\$24,567.91

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$319.64	0.08216%(D)	29.990%	29.990%
Offer 4	\$4,603.19	0.08216%(D)	29.990%	29.990%
Offer 5	\$19,251.98	0.08216%(D)	29.990%	29.990%
ADVANCES				
Standard Adv	\$0.00	0.08216%(D)	29.990%	29.990%

08/10/05 \$2,567.91 \$24567.91

SITE:KC-C TM:CO-5000 ACID:KCC1001  
05/11/06 20: 54:

08/10/05 \$2,567.91 \$24567.91

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



**Citi® Diamond Preferred™ Entertainment Card**

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000	Statement/ Closing Date 07/18/2005	Amount Over Credit Line \$2467.91	Past Due \$3809.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
THE LAKES, NV					
89163-6000					
Stle Date	Post Date	Category	Activity Since Last Statement		Amount

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08285%(D)	30.240%	30.240%
Offer 4	\$0.00	0.08285%(D)	30.240%	30.240%
Offer 5	\$0.00	0.08285%(D)	30.240%	30.240%
ADVANCES				
Standard Adv	\$0.00	0.08285%(D)	30.240%	30.240%

1719

09/12/05 \$24567.91 \$24567.91

SITE:KC-LL TM:CO-5000 ACID:KCC 1  
05/11/06 20: 54:

EXT. DATE NEW PRICE MIN. AM. DUE

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH ID  
83536-9410000

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
THE LAKES, NV	08/16/2005	\$2467.91	\$4325.61	\$516.00	\$24567.91
89163-6000					
Sale Date	Post Date	Category	Activity Since Last Statement		Amount

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08353%(D)	30.490%	30.490%
Offer 4	\$0.00	0.08353%(D)	30.490%	30.490%
Offer 5	\$0.00	0.08353%(D)	30.490%	30.490%
ADVANCES				
Standard Adv	\$0.00	0.08353%(D)	30.490%	30.490%

1720

10/11/05 \$24567.91 \$24567.91

SITE:KC-CL TM:CO-5000 ACID:KCC 1  
05/11/06 20: 54:

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH ID  
83536-9410000

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000	Statement/ Closing Date 09/16/2005	Amount Over Credit Line \$2467.91	Past Due \$4841.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
THE LAKES, NV 89163-6000					

Activity Since Last Statement

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08353%(D)	30.490%	30.490%
Offer 4	\$0.00	0.08353%(D)	30.490%	30.490%
Offer 5	\$0.00	0.08353%(D)	30.490%	30.490%
ADVANCES				
Standard Adv	\$0.00	0.08353%(D)	30.490%	30.490%

1721

11/09/05 \$24567.91 \$24567.91

SITE:KC-CC TM:CO-5000 ACID:KCC 1  
05/11/06 20: 54:

PREVIOUS DUE DATE NEW FINANCE MONTHLY DUES

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 10/17/2005	Amount Over Credit Line \$2467.91	Past Due \$5357.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91

Start Date	Post Date	Category	Activity Since Last Statement	Amount
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Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08422%(D)	30.740%	30.740%
Offer 4	\$0.00	0.08422%(D)	30.740%	30.740%
Offer 5	\$0.00	0.08422%(D)	30.740%	30.740%
ADVANCES				
Standard Adv	\$0.00	0.08422%(D)	30.740%	30.740%

1722

12/12/05 \$2,567.91 \$24567.91

SITE:KC-6 TM:CO-5000 ACID:KCC1741  
05/11/06 20: 54:

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000	Statement/ Closing Date	Amount Over Credit Line	Past Due	Purch/Adv Minimum Due	Minimum Amount Due
THE LAKES, NV	11/15/2005	\$2467.91	\$5873.61	\$516.00	\$24567.91
89163-6000					

Statement Date      Activity Since Last Statement      Amount

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Our records show home phone 208-935-7962 and business phone 208-926-4372. Please update coupon if incorrect.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08490%(D)	30.990%	30.990%
Offer 4	\$0.00	0.08490%(D)	30.990%	30.990%
Offer 5	\$0.00	0.08490%(D)	30.990%	30.990%
ADVANCES				
Standard Adv	\$0.00	0.08490%(D)	30.990%	30.990%

1723

01/10/06 \$ 24567.91 \$24567.91

SITE:KC- TM:CO-5000 ACID:KCC1061  
05/11/06 20: 54:

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH ID  
83536-9410000

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

<b>Customer Service:</b> 1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 12/16/2005	Amount Over Credit Line \$2467.91	Past Due \$6389.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
Sale Date	Post Date	Category	Activity Since Last Statement		Amount

**PAYMENT ALERT:** To avoid a late fee, please get your payment to us by the cutoff time on the due date shown on your billing statement.

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$24,567.91</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$24,567.91</b>

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08559%(D)	31.240%	31.240%
Offer 4	\$0.00	0.08559%(D)	31.240%	31.240%
Offer 5	\$0.00	0.08559%(D)	31.240%	31.240%
ADVANCES				
Standard Adv	\$0.00	0.08559%(D)	31.240%	31.240%

1724



02/09/06 \$2,567.91 \$24567.91

SITE:KC-CL TM:CO-5000 ACID:KCC151  
05/11/06 20: 54:

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH ID  
83536-9410000

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 01/17/2006	Amount Over Credit Line \$2467.91	Past Due \$6905.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
<b>Sale Date</b>	<b>Post Date</b>	<b>Category</b>	<b>Activity Since Last Statement</b>		<b>Amount</b>

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$24,567.91</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$24,567.91</b>

Days This Billing Period: 32

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08559%(D)	31.240%	31.240%
Offer 4	\$0.00	0.08559%(D)	31.240%	31.240%
Offer 5	\$0.00	0.08559%(D)	31.240%	31.240%
ADVANCES				
Standard Adv	\$0.00	0.08559%(D)	31.240%	31.240%

1725

03/13/06 \$ 567.91 \$24567.91

SITE:KC-

TM:CO-5000  
05/11/06

ACID:KCC1961  
20 54:

PMT DUE DATE NEW AMT BALANCE MIN AMT DUE

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 02/15/2006	Amount Over Credit Line \$2467.91	Past Due \$7421.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
<b>Sale Date</b>	<b>Post Date</b>	<b>Category</b>	<b>Activity Since Last Statement</b>		<b>Amount</b>

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$24,567.91</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$24,567.91</b>

Days This Billing Period: 29

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08627%(D)	31.490%	31.490%
Offer 4	\$0.00	0.08627%(D)	31.490%	31.490%
Offer 5	\$0.00	0.08627%(D)	31.490%	31.490%
ADVANCES				
Standard Adv	\$0.00	0.08627%(D)	31.490%	31.490%

1726

04/11/06 \$2,567.91 \$24567.91

SITE:KC-LL

TM:CO-5000  
05/11/06

ACID:KCC1961  
20 54:

MIRIAM G CARROLL  
ATTNY ACCOUNT-CODE=LB15  
KAMIAH  
83536-9410000

ID

CITI CARDS  
P.O. BOX 6411  
THE LAKES, NV  
88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 03/17/2006	Amount Over Credit Line \$2467.91	Past Due \$7937.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
Statement Date	Post Date	Category	Activity Since Last Statement	Amount	

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$24,567.91</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$24,567.91</b>

Days This Billing Period: 30

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08627%(D)	31.490%	31.490%
Offer 4	\$0.00	0.08627%(D)	31.490%	31.490%
Offer 5	\$0.00	0.08627%(D)	31.490%	31.490%
ADVANCES				
Standard Adv	\$0.00	0.08627%(D)	31.490%	31.490%

1727

05/10/06 \$24567.91 \$24567.91 SITE:KC- TM:CO-5000 ACID:KCC\*961  
 05/11/06 20 154:

PAY DUE DATE NEW BALANCE OPEN ADV CODE

MIRIAM G CARROLL  
 ATTY ACCOUNT-CODE=LB15  
 KAMIAH  
 83536-9410000

ID

CITI CARDS  
 P.O. BOX 6411  
 THE LAKES, NV  
 88901-6411



### Citi® Diamond Preferred™ Entertainment Card

Account Number  
 5424 1810 3138 2596

**Customer Service:**

1-800-925-8871	Total Credit Line \$22100	Available Credit Line \$0	Cash Advance Limit \$5000	Available Cash Limit \$0	New Balance \$24567.91
BOX 6000 THE LAKES, NV 89163-6000	Statement/ Closing Date 04/17/2006	Amount Over Credit Line \$2467.91	Past Due \$8453.61	Purch/Adv Minimum Due \$516.00	Minimum Amount Due \$24567.91
Safe Date	Post Date	Category	Activity Since Last Statement		Amount

Help is available! Please call the toll-free number shown above to learn about our special payment options. Call Monday - Friday, 7 am to 9 pm, or Saturday, 8 am to 5 pm, Central Time. Please give us the opportunity to assist you.

Account Summary	Previous Balance	(+) Purchases & Advances	(-) Payments & Credits	(+) FINANCE CHARGE	(=) New Balance
PURCHASES	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91
ADVANCES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL	\$24,567.91	\$0.00	\$0.00	\$0.00	\$24,567.91

Days This Billing Period: 31

Rate Summary	Balance Subject to Finance Charge	Periodic Rate	Nominal APR	ANNUAL PERCENTAGE RATE
PURCHASES				
Standard Purch	\$0.00	0.08696%(D)	31.740%	31.740%
Offer 4	\$0.00	0.08696%(D)	31.740%	31.740%
Offer 5	\$0.00	0.08696%(D)	31.740%	31.740%
ADVANCES				
Standard Adv	\$0.00	0.08696%(D)	31.740%	31.740%

1728

DOCKETED

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 3:45 O'CLOCK P.M.

JAN 22 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose E. Gehring*

Sheila R. Schwager ISB No. 5059  
Loren Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys For Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

PLAINTIFF'S REPLY IN SUPPORT  
OF MOTION FOR ENTRY OF  
JUDGMENT AND REQUEST FOR  
ATTORNEY FEES AND COSTS

Plaintiff, Citibank (South Dakota), N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby submits this reply brief in Support of its Motion for Entry of Judgment and Request for Attorney Fees and Costs ("Citibank's Motion") and in response to the Defendant's "Rebuttal" brief filed in opposition to Citibank's Motion ("Defendant's Opposition"). The Defendant's Opposition contends that 1) Citibank's Motion is premature; 2) Citibank's evidence does not support interest; 3) that attorney fees and costs are not warranted under § 12-121, and 4) re-argues that Citibank is not the real party in interest. The Defendant's arguments as set forth below have no merit and are merely a continued attempt to avoid the judgment and increase Citibank's attorney fees and costs. Final judgment with fees

and costs should be entered in Citibank's favor pursuant to this Court's well reasoned Memorandum Decision and Order entered on December 10, 2007 ("Summary Judgment Order").

### **I. CITIBANK'S MOTION WAS TIMELY FILED PURSUANT TO THE SUMMARY JUDGMENT ORDER**

The Defendant argues, with no citation to authority or factual basis, that Citibank's Motion was pre-mature and was intended to harass and emotionally injure the Defendant due to its receipt during Christmas. The Defendant in making this argument ignores this Court's Summary Judgment Order, in which this Court held and instructed the following: "Citibank's Motion for Summary Judgment is therefore Granted. Citibank shall submit a judgment consistent with this Memorandum Decision and Order within ten (10) days of its date." *Summary Judgment Order*, p. 9. The Summary Judgment Order was dated December 10, 2007. Thus, Citibank, in compliance with this Courts' order, timely submitted the necessary pleadings for the entry of final judgment.

### **II. CITIBANK IS ENTITLED TO INTEREST**

In making the same arguments as in her Motion for Reconsideration, the Defendant contends that Citibank is not entitled to charge interest because 1) Terri Ryning purportedly did not have personal knowledge of the original contact; and 2) the original credit card agreement was not presented. Both of these arguments fail as a matter of law. First, as set forth in Citibank's opposition to the reconsideration motion, the Affidavit of Ms. Ryning and attached business records filed in support of the Motion for Summary Judgment are competent and admissible hearsay evidence pursuant to I.R.E. 803(6) and I.R.E.902(11). Ms. Ryning's affidavit sets forth the facts required under Rule 803(6) and Rule 902(11), under penalty of perjury, and the Defendant has submitted no competent evidence to the contrary. *See* I.R.E. 803(6); I.R.E. 902(11). The Defendant's contention that Ms. Ryning had to have personal knowledge of the creation of the document is simply contrary to law. *Large v. Cafferty Realty, Inc.*, 123 Idaho

676, 683 (1993) (“the custodian need not have personal knowledge of the actual creation of the document nor need the custodian have been an employee of the business when the record was made.”)

Second, as fully briefed in Citibank’s Memorandum in Support of Plaintiff’s Motion for Summary Judgment, and not refuted by the Defendant in opposition to that motion, the case authority is clear that a credit card holder’s use of their credit card grants their assent to the terms of the credit card agreement, and it is not necessary to present an original or signed agreement. *See Summary Judgment Brief and legal authorities cited therein, p. 10.* Indeed, Carroll is not claiming that she did not apply for the credit card, use the Account, or make purchases on the Account.<sup>1</sup> Thus, she is required to pay pursuant to the terms of the Account.

Furthermore, each monthly Account statement admittedly received by the Defendant set forth and itemized the applicable interest rate.<sup>2</sup> As set forth by Citibank, and again admittedly received by the Defendant, the Account statement dated 6/16/05 itemized the annual interest rate of 29.990%. *Id.* The Defendant admitted that she received the Account statements at issue on or about the date reflected on each statement<sup>3</sup> and when she received those statements, she did not dispute any of the charges, credits, or payments.<sup>4</sup> Of course, these discovery responses and admissions are admissible evidence as the admission of a party opponent, I.R.E. 801(d)(2). Thus, by the Defendant’s own admissions and discovery responses submitted in support of Citibank’s Motion for Summary Judgment, Citibank is entitled to the accruing interest of 29.990%.<sup>5</sup>

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<sup>1</sup> *See Affidavit of Sheila R. Schwager in Support of Motion for Summary Judgment (“Schwager Aff.”), Exh. 1, Defendant’s Answers to Request for Admission Nos. 38, 40, 41-43, 45-52, 54-55, 57, 61; Affidavit of Terri Rynning in Support of Summary Judgment (“Rynning Aff.”), ¶ 1-10, Exh. 2;*

<sup>2</sup> *Rynning Aff., ¶ 6, Exh. 2; Schwager Aff., Exh. 2, Defendant’s Amended Answers to Admission Nos. 7, 13; Supplemental Affidavit of Sheila R. Schwager in Response to Objection to Motion for Entry of Judgment (“Supp. Aff.”), Exh. A.*

<sup>3</sup> *Schwager Aff., Exh. 2, Defendant’s Amended Answers to Admission Nos. 7, 13; Supp. Aff., Exh. A.*

<sup>4</sup> *Id.*

<sup>5</sup> Interest would also accrue under Idaho Code § 28-22-104.

### III. CITIBANK IS ENTITLED TO ATTORNEY FEES AND COSTS AS A MATTER OF LAW

The only argument that the Defendant makes against Citibank's request for attorney fees and costs is her claim that the case was not pursued frivolously, unreasonably and without foundation under Idaho Code § 12-121. Although Citibank takes issue with that argument and based upon the record in this case believes that in fact fees are warranted under § 12-121, it is not necessary to rule upon that issue as there can be no dispute that Citibank is entitled to attorney fees and costs as the prevailing party pursuant to I.C. § 12-120(3), as set forth in Citibank's Motion, and un-refuted by the Defendant.<sup>6</sup>

### IV. AS THIS COURT DETERMINED, CITIBANK IS THE REAL PARTY IN INTEREST

Again, in the Defendant's Opposition she re-raises the same arguments that Defendant raised in her summary judgment opposition, her motion for reconsideration, and her recent and untimely "Brief in Support of Motion for Reconsideration,"<sup>7</sup> wherein Defendant essentially claims this Court erred in finding standing. These arguments after summary judgment violate Rule 56 of the Idaho Rules of Civil Procedure and fail for the reasons set forth in this Court's Summary Judgment Order and Citibank's Reply and Opposition to the Defendant's Motion for Reconsideration. The Defendant has presented no new evidence that Citibank is not the owner

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<sup>6</sup> In the attorney fee argument of her opposition, the Defendant also makes an unrelated argument that the Defendant purportedly identified errors in the Account statements, that Citibank accepted these errors, and therefore she has a claim under the TILA. All of these arguments were addressed in the summary judgment memorandum and fail as a matter of law, as determined by the Summary Judgment Order. See *Summary Judgment Brief*, pp. 12-21.

<sup>7</sup> This newly filed brief, filed on January 17, 2008, a mere seven days prior to the hearing should be stricken as untimely pursuant to I.R.C.P. 7(b)(3).



of the Account.<sup>8</sup> Instead, the Defendant merely reargues that Citibank sold the receivables. As found by this Court, that legal argument is irrelevant to the issue of standing and Citibank, as the owner of the Account has standing.

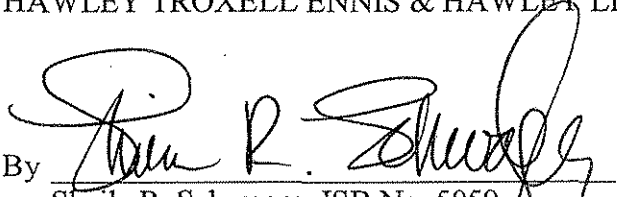
## V. CONCLUSION

Based upon Citibank's Motion for Entry of Final Judgment and Request for Attorney Fees and Costs, the supporting pleadings filed herein, and the record in this case, Citibank respectfully requests an award of attorney fees and costs in the sum of \$51,545.97 (\$49,161 in fees; \$2,384.97 in costs), which the Defendant forced Citibank to incur in this action pursuant to the terms of the Card Agreement and/or Idaho Code § 12-120(3). The \$51,545.97 in fees<sup>9</sup> and costs should be added to the Account balance of \$40,812.81, for a total of \$92,358.78. Thus, Citibank requests that the proposed judgment be entered against Defendant Miriam Carroll in the total amount of \$92,358.78, plus interest at the legal rate from the date of the judgment and Citibank's post-judgment collection costs, including reasonable attorney fees and such other relief as this Court deems appropriate.

DATED THIS 21<sup>st</sup> day of January, 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By



Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

---

<sup>8</sup> Even the Affidavit of Crystal Britt that the Defendant references, which is dated prior to Citibank filing this collection action and which was not filed by Citibank in this case, declares that Citibank is the owner of the Account and is the party to whom the debt is owed. Thus, there is simply no issue created by that Affidavit. Furthermore, the case cited by the Defendant, *McCluskey v. Galland*, 95 Idaho 472, 474 (1973) does not support her argument. As found by this Court, Citibank did not assign or transfer the Account, only receivables of an Account. Thus, under *McCluskey*, Citibank has the right, as the real party in interest, to pursue any actions under the Account. As found by this Court, "Citibank's obligation to the Master Trust to transfer the money collected does not affect Ms. Carroll's contractual relationship with an obligation to Citibank." *Summary Judgment Order*, pp. 4-5.

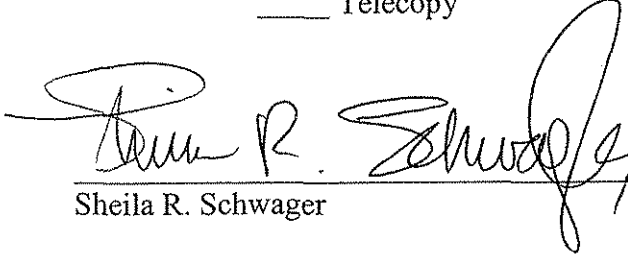
<sup>9</sup> Citibank should also be awarded fees in having to respond to Defendant's Opposition and any other pleadings that Defendant files in this case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of January, 2008, I caused to be served a true copy of the foregoing PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[pro se]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheila R. Schwager

DOCKETED

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 2:50 O'CLOCK A.M.

JAN 25 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose E. Gehring*

Sheila R. Schwager ISB No. 5059  
Loren K. Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys for Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,	)	Case No. CV-2006-37067
Plaintiff/Counterdefendant,	)	
vs.	)	PLAINTIFF'S MOTION FOR
MIRIAM G. CARROLL,	)	PROTECTIVE ORDER REGARDING
Defendant/Counterclaimant.	)	DEFENDANT'S POST SUMMARY
	)	JUDGMENT ORDER DISCOVERY
	)	REQUESTS

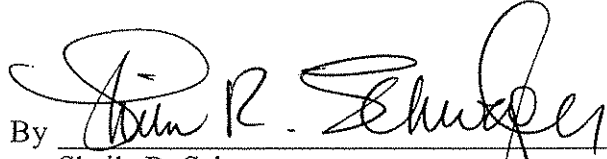
Pursuant to I.R.C.P. 26(c), Plaintiff/Counterdefendant Citibank (South Dakota) N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, respectfully moves this Court for the entry of a Protective Order that prevents Defendant from seeking any additional discovery from Plaintiffs in this action that has now been completely adjudicated and resolved through the Court's recent opinion granting Plaintiff's motion for summary judgment. In addition, Plaintiff respectfully requests an award of attorney fees and

PLAINTIFF'S MOTION FOR PROTECTIVE ORDER REGARDING  
DEFENDANT'S POST SUMMARY JUDGMENT ORDER DISCOVERY  
REQUESTS - 1

costs for being compelled to bring this Motion. This Motion is supported by a Memorandum in Support and an Affidavit of Sheila R. Schwager, filed concurrently herewith.

DATED THIS 2nd day of January, 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

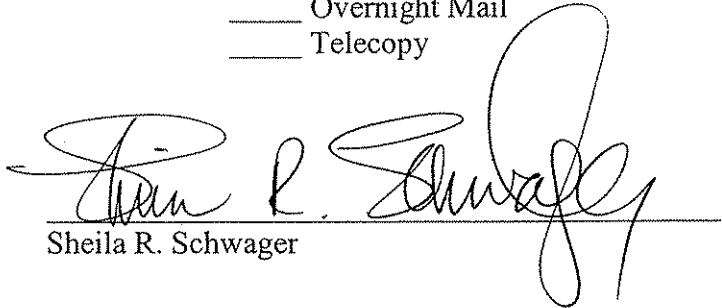
By   
Sheila R. Schwager  
Attorneys for Plaintiff/Counterdefendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of January, 2008, I caused to be served a true copy of the foregoing PLAINTIFF'S MOTION FOR PROTECTIVE ORDER REGARDING DEFENDANT'S POST SUMMARY JUDGMENT ORDER DISCOVERY REQUESTS by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheila R. Schwager

DOCKETED

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 2:50 O'CLOCK P.M.

JAN 25 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Rose Gehring*

Sheila R. Schwager ISB No. 5059  
Loren Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys For Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

Citibank (SOUTH DAKOTA) N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

MEMORANDUM IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PROTECTIVE ORDER REGARDING  
DEFENDANT'S POST SUMMARY  
JUDGMENT ORDER DISCOVERY  
REQUESTS

Plaintiff, Citibank (South Dakota) N.A. ("Citibank"), by and through its attorneys of record, Hawley Troxell Ennis & Hawley LLP, hereby submits this Memorandum in Support of Plaintiff's Motion for a Protective Order.

On or about January 14, 2008, Plaintiff's counsel received a letter from Defendant that stated, "Enclosed are the two subpoenas that will be served on the third parties as indicated. You

MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR  
PROTECTIVE ORDER REGARDING DEFENDANT'S POST SUMMARY  
JUDGMENT ORDER DISCOVERY REQUESTS - 1

are being provided copies [of] these subpoenas 7 days in advance of them being served on the third parties pursuant to Rule 45(b)(2) of the Idaho Rules of Civil Procedure.” See Exhibit A to Affidavit of Sheila R. Schwager in Support of Plaintiff’s Motion for Protective Order Regarding Defendant’s Post Summary Judgment Order Discovery Requests (“Schwager Aff.”). The Subpoena Duces Tecum, which were enclosed with the letter, are addressed to “Crystal Brit or Custodian of Records, Citicorp Credit Services Inc. USA” and to “Custodian of Records, Trustee, Citibank Credit Card Master Trust I, Deutsche Bank Trust Company Americas.” See Exhibits B & C to the Schwager Aff. The subpoenas primarily request document production regarding the securitization process and the transfer and removal of receivables to and from the Master Trust. *Id.*

The Defendant has absolutely no authority to propound any additional discovery. Pursuant to the Scheduling Order entered by this Court on September 15, 2006, all discovery in this case was to be completed by March 15, 2007. The Defendant has received no authority from this Court, nor is there any statute or rule that permits this newly requested discovery at this stage in the proceedings. Not only does this new discovery come ten months after expiration of the discovery deadline of March 15, 2007, it comes a month after this Court issued its order fully resolving this case. As this Court is aware, the issues regarding securitization and/or Citibank’s standing to bring this lawsuit and recover this debt have been fully resolved through the Court’s Memorandum Decision and Order (“Summary Judgment Order”) issued on December 10, 2007. In the Summary Judgment Order, at pgs. 3-5, the Court rejected Defendant’s arguments regarding discovery and standing:

Ms. Carroll contends that Citibank lacks standing because it transferred the credit card receivables (“receivables”) on her account to the Master Trust. Ms. Carroll questions whether the receivables have been transferred back to Citibank and she also asks me to compel discovery on the ownership of the receivables. . . .

Nothing in the evidence suggests that Citibank transferred to the Master Trust anything more than the receivables on Ms. Carroll’s account. To the contrary, Citibank Credit Card Issuance Trust’s Prospectus specifically provides that “[t]he master trust owns the credit card receivables generated in designed credit card accounts, but Citibank (South Dakota) or one of its affiliates will continue to own the accounts themselves.”

The transfer of the account is not definitionally included in the transfer of the receivables as argued by Ms. Carroll. The receivables are separate from the account, and one can be transferred without the other. The record reflects that Ms. Carroll’s account was retained by Citibank. As owner of the account, Citibank has standing to collect the debt owed on the account. It is of no moment that Citibank contractually obliged itself to transfer the money it collects on its accounts to the Master Trust. Citibank’s obligation to the Master Trust to transfer the money collected does not affect Ms. Carroll’s contractual relationship with and obligation to Citibank. I therefore conclude that Citibank has standing to bring this suit to collect the credit card debt owed by Ms. Carroll on the account.

The Court then entered an order granting Citibank’s summary judgment motion and directed Citibank to submit a judgment within 10 days.

Thus, not only are the Defendant’s subpoenas issued with no authority from this Court, they are requesting documents related to an issue that has already been decided and is now moot. Citibank has expended tremendous resources litigating this case, and Citibank should not now be required to respond to discovery that is being proposed well after the discovery deadline and after the final resolution of this matter. Therefore, pursuant to I.R.C.P. 26(c)(1), Citibank

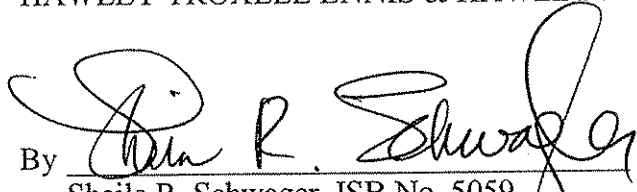


requests a protective order "that the discovery not be had" and that no further discovery be allowed to Defendants in this fully adjudicated case<sup>1</sup>.

Citibank further requests its attorney fees and costs in having to file the Motion for a Protective Order.

DATED THIS 22<sup>nd</sup> day of January, 2008.

HAWLEY TROXELL ENNIS & HAWLEY LLP

By   
Sheila R. Schwager, ISB No. 5059  
Attorneys for Plaintiff/Counterdefendant

---

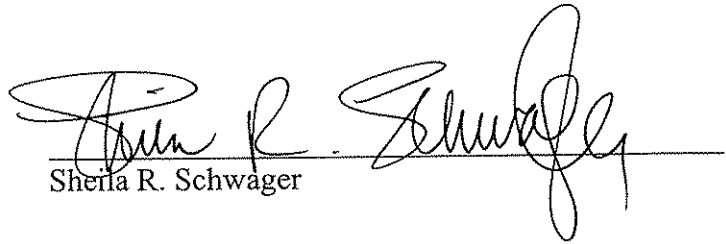
<sup>1</sup> Citibank also objects pursuant to I.R.C.P. 45(d), as the requests are unreasonable, oppressive and should require the advancement of costs of production. Nevertheless, since the requests are not timely and are in regard to a fully adjudicated issue, the protective motion should be granted under I.R.C.P. 26 and there should be no need to address the issues raised by I.R.C.P. 45(d).

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of January, 2007, I caused to be served a true copy of the foregoing MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER REGARDING DEFENDANT'S POST SUMMARY JUDGMENT ORDER DISCOVERY REQUESTS by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, Idaho 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
\_\_\_\_\_  
Sheria R. Schwager

DOCKETED

IDAHO COUNTY DISTRICT COURT  
FILED  
AT 2:50 O'CLOCK P.M.

JAN 25 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*R. E. Gehring*

Sheila R. Schwager ISB No. 5059  
Loren K. Messerly ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys for Citibank (South Dakota) N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA) N.A.,  
Plaintiff/Counterdefendant,  
vs.  
MIRIAM G. CARROLL,  
Defendant/Counterclaimant.

Case No. CV-2006-37067

AFFIDAVIT OF SHEILA R.  
SCHWAGER IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
PROTECTIVE ORDER REGARDING  
DEFENDANT'S POST SUMMARY  
JUDGMENT ORDER DISCOVERY  
REQUESTS

SHEILA R. SCHWAGER, being first duly sworn upon oath, deposes and says:

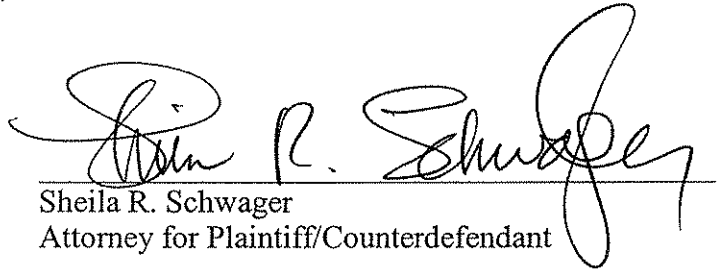
1. I am a partner with the law firm of Hawley Troxell Ennis & Hawley LLP, counsel of record for Plaintiff/Counterdefendant Citibank (South Dakota) N.A. ("Citibank") in the above-captioned case. I make this Affidavit in support of *Plaintiff's Motion For Protective Order Regarding Defendant's Post Summary Judgment Discovery Requests* based upon my personal knowledge.

AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF PLAINTIFF'S  
MOTION FOR PROTECTIVE ORDER REGARDING DEFENDANT'S POST  
SUMMARY JUDGMENT ORDER DISCOVERY REQUESTS - 1

2. On or about January 14, 2008, I received a letter from Defendant indicating that she was preparing to serve two "third-party" subpoenas and was providing me with copies of the subpoenas seven days in advance of service upon the third parties. The Subpoena Duces Tecum, which were enclosed with the letter, are addressed to "Crystal Brit or Custodian of Records, Citicorp Credit Services Inc. USA" and to "Custodian of Records, Trustee, Citibank Credit Card Master Trust I, Deutsche Bank Trust Company Americas." Attached hereto as Exhibits A, B, and C and incorporated herein by reference, are true and correct copies of the letter and both subpoenas.

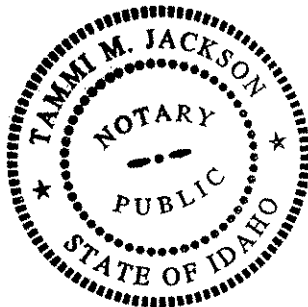
Further, your affiant sayeth naught.


DATED THIS 22nd day of January, 2008.

  
\_\_\_\_\_  
Sheila R. Schwager  
Attorney for Plaintiff/Counterdefendant

STATE OF IDAHO            )  
  ) ss.  
County of Ada            )

SUBSCRIBED AND SWORN before me this 22nd day of January, 2008.



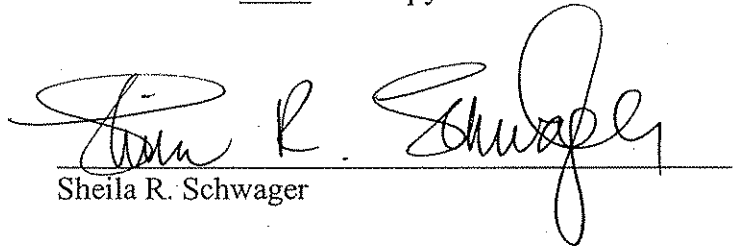
  
\_\_\_\_\_  
Name: Tammi Jackson  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 8/28/09

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of January, 2007, I caused to be served a true copy of the foregoing AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF PLAINTIFF'S MOTION FOR PROTECTIVE ORDER REGARDING DEFENDANT'S POST SUMMARY JUDGMENT ORDER DISCOVERY REQUESTSS by the method indicated below, and addressed to each of the following:

Ms. Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[*pro se*]

U.S. Mail, Postage Prepaid  
 Hand Delivered  
 Overnight Mail  
 Telecopy

  
Sheila R. Schwager

Miriam G. Carroll  
104 Jefferson Drive  
Kamiah, ID 83536-9410  
208-935-7962  
FAX: 208-926-4169

January 8<sup>th</sup>, 2008

Sheila R. Schwager  
Hawley Troxell Ennis & Hawley L.L.P.  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617

RE: Subpoenas: CV-2006-37067 – Citibank vs. Carroll

Dear Ms. Schwager:

Enclosed are the two subpoenas that will be served on the third parties as indicated. You are being provided copies these subpoenas 7 days in advance of them being served on the third parties pursuant to Rule 45(b)(2) of the Idaho Rules of Civil Procedure.

Please call if you have any questions.

Sincerely,

Miriam G. Carroll

Miriam G. Carroll  
Defendant, *in propria persona*

JAN 14 2008

1746

EXHIBIT A

Miriam G Carroll  
104 Jefferson Dr.  
Kamiah, ID 83536-9410  
208-935-7962  
FAX: 208-926-4169  
Defendant, *in propria persona*

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A. ,	)	
	)	Case No CV-2006-37067
Plaintiff,	)	
	)	SUBPOENA DUCES TECUM
vs	)	
	)	
MIRIAM G. CARROLL,	)	
	)	
Defendant,	)	
<hr/>		

The State of Idaho

To:

**Custodian of Records  
Trustee, Citibank Credit Card Master Trust I  
Deutsche Bank Trust Company Americas  
60 Wall Street  
New York, NY 10005**

**YOU ARE COMMANDED:**

[ ] to appear in the Court at the place, date and time specified below to testify in the above case

[ ] to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

[ X ] to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below.

[ ] to permit inspection of the following premises at the date and time specified below.

PLACE DATE AND TIME:

---

---

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena

- 1 **DOCUMENT PRODUCTION:** A certified copy of the Reassignment of the Receivables for the account number 5424 1810 3138 2596 from the Citibank Credit Card Master Trust I to the Seller, Citibank (South Dakota), N.A , in the form of Exhibit C of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001
2. **DOCUMENT PRODUCTION:** A certified copy of the Acceptance of the Receivables by the Seller, Citibank (South Dakota), N.A., for the account number 5424 1810 3138 2596 pursuant to the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001 .
- 3 **DOCUMENT PRODUCTION:** A certified copy of the listing (without compromising security) showing account number 5424 1810 3138 2596 as a Removed Account, pursuant to Section 2 10(b) of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001
- 4 **DOCUMENT PRODUCTION:** A certified copy of the Notice of Removal sent or supplied to the Trustee, the Servicer, each Rating Agency, and each Series Enhancer specifying the Removal Date, for account number 5424 1810 3138 2596 pursuant to Section 2.10(a) of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001.
5. **DOCUMENT PRODUCTION:** A certified copy of the Warrantee of the Removal Date for the list of Removed Accounts (without compromising security) pursuant to Section 2.10(b) of the Pooling and Servicing



Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001, as being true and complete in all material respects, as related to the Receivables associated with account number 5424 1810 3138 2596.

6. **DOCUMENT PRODUCTION:** A certified copy of the Certificate delivered to the Trustee and each Series Enhancer by a Vice President or more senior officer, dated the Removal date, to the effect that such Seller reasonably believes that such removal will not have an Adverse Effect and is not reasonably expected to have an Adverse Effect at any time in the future pursuant to Section 2.10(e) of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001, as related to account number 5424 1810 3138 2596.
7. **DOCUMENT PRODUCTION:** A certified copy of the Tax Opinion (without compromising security), dated the Removal Date with respect to such removal pursuant to Section 2.10(f) of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001, as related to account number 5424 1810 3138 2596.
8. **DOCUMENT PRODUCTION:** A certified copy of the Certificate of a Vice President or more senior officer sent or supplied to the Trustee, dated the Removal Date, pursuant to Section 2.10(g) of the Pooling and Servicing Agreement dated as of May 29, 1991, as Amended and Restated as of October 5, 2001, as related to account number 5424 1810 3138 2596.
9. **DOCUMENT PRODUCTION:** A certified copy of any and all assignments of the Receivables to a party other than Citibank (South Dakota), N A , associated with account number 5424 1810 3138 2596 that removed the Receivables from the Citibank Credit Card Master Trust I

For each requested document which does not exist, provide a certification, sworn under oath, that such document does not exist, whether such document has ever existed, and if it did exist and is no longer in existence, the reason, method and date of destruction of such document.

The production of the requested documents is in lieu of your appearance in the Idaho County District Court, State of Idaho. As such, your certification, under oath, is required, as to the truth and accuracy of each document requested.

Delivery of the documents is required on or before the 27<sup>th</sup> day of February, 2008, at the following address:

Miriam G. Carroll  
104 Jefferson Dr.  
Kamiah, ID 83536-9410

The requested documents may also be FAXED to the following number:  
208-926-4169

Dated this 8th day of January, 2008.

By order of the court

**ROSE E. GEHRING, CLERK**

---

Clerk

**JOAN HALL**

---

Deputy  
(Court Seal)

Miriam G Carroll  
104 Jefferson Dr.  
Kamiah, ID 83536-9410  
208-935-7962  
FAX: 208-926-4169  
Defendant, *in propria persona*

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE  
STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A.,	)	
	)	Case No. CV-2006-37067
Plaintiff,	)	
	)	SUBPOENA DUCES TECUM
vs.	)	
	)	
MIRIAM G CARROLL,	)	
	)	
Defendant,	)	
_____	)	

The State of Idaho  
To: **Crystal Britt or**  
**Custodian of Records**  
**Citicorp Credit Services Inc., USA**  
**7920 Northwest 110<sup>th</sup> Street**  
**Kansas City, MO 64153**

**YOU ARE COMMANDED:**

[ ] to appear in the Court at the place, date and time specified below to testify in the above case.

[ ] to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

SUBPOENA DUCES TECUM

Pg. 1 of 2.

EXHIBIT C

[ X ] to produce or permit inspection and copying of the following documents or objects, including electronically stored information, at the place, date and time specified below.

[ ] to permit inspection of the following premises at the date and time specified below

PLACE DATE AND TIME:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

You are further notified that if you fail to appear at the place and time specified above, or to produce or permit copying or inspection as specified above that you may be held in contempt of court and that the aggrieved party may recover from you the sum of \$100 and all damages which the party may sustain by your failure to comply with this subpoena.

**DOCUMENT PRODUCTION:** A certified copy of the contract referred to in your affidavit of July 22<sup>nd</sup>, 2005 in the above titled case where you state "By contract, CCSI/USA has agreed to collect debt owed to Citibank (South Dakota), N A on its credit card accounts."

The production of the requested document is in lieu of your appearance in the Idaho County District Court, State of Idaho. As such, your certification, under oath, is required, as to the truth and accuracy of the document requested. Delivery of the documents is required on or before the 27<sup>th</sup> day of February, 2008, at the following address:

Miriam G. Carroll  
104 Jefferson Dr  
Kamiah, ID 83536-9410

Dated this 17<sup>th</sup> day of January, 2008

By order of the court

ROSE E. GEHRING, CLERK  
Clerk

JOAN HALL  
Deputy  
(Court Seal)

DOCKETED

JAN 30 2008

ROSE E. GEHRING  
CLERK OF DISTRICT COURT  
*Kathy Johnson* DEPUTY

Sheila R. Schwager, ISB No. 5059  
Loren K. Messerly, ISB No. 7434  
HAWLEY TROXELL ENNIS & HAWLEY LLP  
877 Main Street, Suite 1000  
P.O. Box 1617  
Boise, ID 83701-1617  
Telephone: (208) 344-6000  
Facsimile: (208) 342-3829  
Email: srs@hteh.com  
lmes@hteh.com

Attorneys for Citibank (South Dakota), N.A.

IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT  
OF THE STATE OF IDAHO, IN AND FOR THE COUNTY OF IDAHO

CITIBANK (SOUTH DAKOTA), N.A., )  
 )  
Plaintiff/Counterdefendant, )  
vs. )  
 )  
MIRIAM G. CARROLL, )  
 )  
Defendant/Counterclaimant. )

Case No. CV-2006-37067

SUPPLEMENTAL AFFIDAVIT OF  
SHEILA R. SCHWAGER IN SUPPORT  
OF PLAINTIFF'S MOTION FOR  
ENTRY OF JUDGMENT AND  
REQUEST FOR ATTORNEY FEES AND  
COSTS

SHEILA R. SCHWAGER, being first duly sworn upon oath, deposes and states as follows:

1. I am a partner of the law firm of Hawley Troxell Ennis & Hawley LLP, counsel of record for Plaintiff/Counterdefendant Citibank (South Dakota), N.A. ("Citibank"), in the above-captioned case. Pursuant to Idaho Code §§ 12-120 and 12-121, I make this Supplemental Affidavit in Support of Plaintiff's Motion For Entry of Judgment and Request For Attorney Fees and Costs ("Supplemental Affidavit").

SUPPLEMENTAL AFFIDAVIT OF SHEILA R. SCHWAGER IN  
SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT  
AND REQUEST FOR ATTORNEY FEES AND COSTS - 1

2. Pursuant to this Court's Memorandum Decision and Order dated December 10, 2007, in which this Court granted summary judgment in favor of Citibank, I filed Plaintiff's Motion for Entry of Judgment and Request for Attorney Fees and Costs on December 21, 2007, ("Final Judgment Motion") and my supporting affidavit with an attached Exhibit A containing the itemized bills and edit lists for the attorney fees and costs incurred by Citibank in this action ("Initial Attorney Fee and Cost Affidavit").

3. Subsequent to the filing of the Initial Attorney Fee and Cost Affidavit, the Defendant filed a Motion for Reconsideration, a pleading entitled Objections, an Objection to the Motion for Entry of Judgment, and a Motion to Continue Hearing on Final Judgment and Entry on Judgment ("Defendant's Motions"). In addition, the Defendant served me with a notice to issue certain Subpoenas upon Citibank ("Subpoena").

4. On January 24, 2008, the Final Judgment Motion and the Defendant's Motions came regularly for hearing. After oral argument, this Court denied the Defendant's Motions and held it was taking the Final Judgment Motion under advisement to consider the amount of attorney fees and costs to be awarded to Citibank. The Court also stated that Citibank was allowed to file a supplement to the Final Judgment Motion to set forth the additional attorney fees and costs incurred by Citibank subsequent to the filing of the Initial Attorney Fee and Cost Affidavit.

5. In its original Final Judgment Motion, as supported by the Initial Attorney Fee and Cost Affidavit, Citibank requested an award of attorney fees in the sum of \$49,161.00 and costs in the sum of \$2,384.97.

6. Subsequent to the filing of the Initial Attorney Fee and Cost Affidavit, Citibank has incurred an additional \$6,014.00 in attorney fees and \$55.80 to address the Defendant's

Motions and the Subpoena (which includes a Motion for a Protective Order set for hearing for February 11, 2008).

7. Attached hereto as Exhibit A are the itemized bills and edit lists for the attorney fees and costs incurred by Citibank in the above-captioned case since December 17, 2007.

8. The invoices have been redacted to protect privileged information. The bills and edit lists contain identification of the attorneys and paralegals working on this matter, the amount of time devoted to the matter, kept in tenth of an hour increments (six minutes each), and the total extended charge for each entry. From these lists, the final bill on the matter is computed, and the statement issued to the client is produced by the computer.

9. The fees of Hawley Troxell Ennis & Hawley LLP were computed and charged in this case on an hourly basis. Each attorney and paralegal assigned to the case kept contemporaneous time records which detailed the work performed and the time devoted to such work. For billing purposes, each hour is divided in ten equal parts of six minutes each. Time records kept by attorneys and paralegals were entered into a computer and statements were rendered from such computerized records.

10. The hourly rates charged by the attorneys and paralegals who performed service in connection with this case are detailed in the attached billing statements. Service rates of the attorneys and paralegals were selected based on the nature of the work required to be performed and the most cost effective manner in which to complete it.

11. Based on my experience and knowledge of legal fees charged by Hawley Troxell Ennis & Hawley LLP, and other law firms in Idaho, in connection with lawsuits of a similar nature and my familiarity with the facts of this case and the services performed, I believe the hourly rates charged and time devoted to this matter by Hawley Troxell Ennis & Hawley LLP

were reasonable and resulted in total fees and costs advanced, which are commensurate with charges in like cases.

12. Each of the attorneys assigned to this matter charged reduced rates, due to the relationship with Citibank. For instance, my standard billing rate in 2007 was \$200 per hour; yet, I billed Citibank at the reduced hourly rate of \$185 per hour.

13. The supplemental attorneys fees and costs, contained in Exhibit A, total:

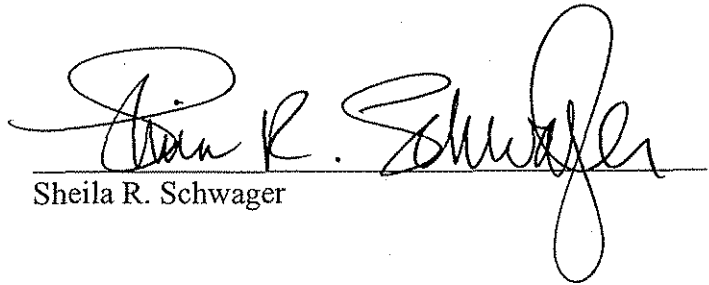
Attorney Fees	\$6,014.
Copy charges	\$24.40
Binding	
Postage	\$6.15
Long distance	
Computer Assisted Legal Research	
Overnight Delivery	\$25.25
Telecopy	
Travel Expenses For Hearings in Grangeville, Idaho	
Witness Fee – David F. Capps	
Deposition Transcript – Mike Larsen	
Hearing Transcript	
Process Serving Fee	_____
Total Supplemental Fees and Costs	\$6,069.80

14. In the Initial Attorney Fee and Cost Affidavit, I indicated that Citibank had incurred reasonable and necessary attorney fees in the sum of \$49,161.00 and reasonable and necessary costs in the sum of \$2,384.97. Thus, the total amount of attorney fees and costs necessarily and reasonably incurred by Citibank in this case, as evidenced by Exhibit A to the Initial Attorney Fee and Cost Affidavit and Exhibit A to this Supplemental Affidavit, is \$57,615.77 (attorney fees of \$55,175 and costs of \$2,440.77). To the best of my knowledge and belief, the sum of \$57,615.77 constitutes reasonable attorney fees and costs necessarily incurred by Citibank in this case.



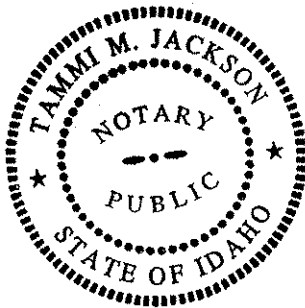
15. Therefore, Citibank respectfully requests a total award of attorney fees in the sum of \$55,175 and costs in the sum of \$2,440.77, which the Defendant forced Citibank to incur in this action, pursuant to the terms of the Contract, Idaho Code § 12-120(3) and/or Idaho Code § 12-121.


Further your affiant sayeth naught.

  
Sheila R. Schwager

STATE OF IDAHO            )  
  ) ss.  
County of Ada             )

SUBSCRIBED AND SWORN before me this 29<sup>th</sup> day of January, 2008



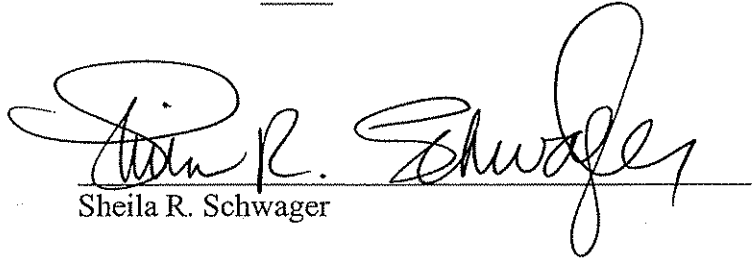
  
Name: Tammi Jackson  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 8/28/09

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27<sup>th</sup> day of January, 2008, I caused to be served a true copy of the foregoing SUPPLEMENTAL AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS by the method indicated below, and addressed to each of the following:

Miriam G. Carroll  
HC-11 Box 366  
Kamiah, ID 83536  
[pro se]

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Mail
- Telecopy
- Email

  
\_\_\_\_\_  
Sheila R. Schwager

CITI CORP  
ATTN: LEGAL BILLING COMPLIANCE  
TAMPA, FL 33610

INVOICE DATE: Jan 8, 2008  
INVOICE NO.: \*\*\*\*\*  
FILE NO.: 41834-0007  
EIN: [REDACTED]

For Professional Services Rendered Through Dec 31, 2007  
RE: CARROLL, MIRIAM/LENDER LIABILITY DEFENSE  
CITI MATTER #200607647

Legal Services

<u>Atty</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/07 SRS	REVISE MOTION FOR ENTRY OF JUDGMENT AND REQUEST FOR ATTORNEY FEES AND COSTS; REVIEW ITEMIZATION OF THE TIME RE SAME; REVISE AFFIDAVIT OF SHEILA R. SCHWAGER IN SUPPORT THEREOF; CORRESPONDENCE TO CLIENT RE SAME.	3.9 Hrs	\$185/hr	\$721.50
12/18/07 SRS	TELEPHONE CONFERENCE WITH [REDACTED] RE ATTORNEY FEE REQUEST MOTION AND DETAILED TIME ENTRIES; CORRESPONDENCE TO [REDACTED].	0.40 Hrs	\$185/hr	\$74.00
12/18/07 LMES	REVIEW FILE RE NUMBER OF MOTIONS FILED, BRIEFS FILED, AND DISCOVERY REQUESTED; SEND SUMMARY EMAIL TO [REDACTED] FOR CLIENT.	0.50 Hrs	\$135/hr	\$67.50
12/19/07 SRS	REVIEW CORRESPONDENCE FROM [REDACTED] RE SUMMARY JUDGMENT MATERIALS; FORWARD SAME; REVIEW REVISED MOTION FOR JUDGMENT AND ATTORNEY FEES, AFFIDAVIT, AND JUDGMENT; FINALIZE EXHIBITS AND FILE SAME.	0.60 Hrs	\$185/hr	\$111.00

12/20/07 SRS	CORRESPONDENCE WITH CLIENT RE HEARING DATE; FINALIZE AND FILE SAME.	0.20 Hrs	\$185/hr	\$37.00
12/20/07 LMES	TELEPHONE CONFERENCE WITH COURT CLERK TO SCHEDULE HEARING ON MOTION FOR ENTRY OF JUDGMENT AND ATTORNEY FEES; DRAFT NOTICE OF HEARING.	0.50 Hrs	\$135/hr	\$67.50
12/31/07 LMES	RESEARCH MOTION FOR RECONSIDERATION; DRAFT ANALYSIS.	1.60 Hrs	\$135/hr	\$216.00
Total Legal Services:		7.70 Hrs		\$1,294.50
Legal Services Summary				
SHEILA R. SCHWAGER		5.10 hours at \$185.00 =		\$943.50
LOREN K. MESSERLY		2.60 hours at \$135.00 =		\$351.00
<u>Client Charges</u>				
COPYING - 244 copies				\$24.40
POSTAGE				\$6.15
Total Client Charges				\$30.55
TOTAL THIS BILL				<u>\$1,325.05</u>

CITI CORP  
ATTN: LEGAL BILLING COMPLIANCE  
[REDACTED]  
TAMPA, FL 33610

INVOICE DATE: Jan 28, 2008  
INVOICE NO.: \*\*\*\*\*  
FILE NO.: 41834-0007  
EIN: [REDACTED]

For Professional Services Rendered Through Jan 28, 2008  
RE: CARROLL, MIRIAM / LENDER LIABILITY DEFENSE  
CITI MATTER # 200607647

Legal Services  
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Atty -----	Description -----	Hours -----	Rate -----	Amount -----
01/02/08 SRS	WORK ON REVIEW OF MOTION FOR RECONSIDERATION; CORRESPONDENCE TO [REDACTED] RE STANDARD FOR MOTIONS FOR RECONSIDERATION UNDER IDAHO LAW.	0.50 Hrs	\$185/hr	\$92.50
01/03/08 SRS	WORK ON REVIEW AND POTENTIAL OBJECTIONS TO MOTION FOR RECONSIDERATION; REVIEW MOTION TO CONTINUE MOTION FOR ENTRY OF FINAL JUDGMENT AND OBJECTIONS.	1.10 Hrs	\$185/hr	\$203.50
01/03/08 LMES	REVIEW RECONSIDERATION BRIEF AND CORRESPONDENCE TO [REDACTED] REVIEW CASE LAW ON MOTION TO RECONSIDER.	0.50 Hrs	\$135/hr	\$67.50
01/04/08 SRS	TELEPHONE CONFERENCE WITH [REDACTED] RE RESPONSE STRATEGY TO MOTION FOR RECONSIDERATION AND VARIOUS MOTIONS FILED BY CARROLL.	0.40 Hrs	\$185/hr	\$74.00
01/04/08 LMES	DRAFT LETTER TO CARROLL RE NEED TO COMPLY WITH IDAHO RULES FOR DEADLINE WITH OBJECTIONS AND RESPONSE BRIEFS.	0.50 Hrs	\$135/hr	\$67.50
01/07/08 SRS	WORK ON REPLY AND OPPOSITION TO MOTION FOR RECONSIDERATION.	1.80 Hrs	\$185/hr	\$333.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

01/08/08 SRS	REVIEW EVIDENTIARY OBJECTIONS AND COUNTER IRE RE SAME; REVIEW CASE LAW RE SAME; WORK ON OBJECTION TO MOTION FOR RECONSIDERATION; WORK ON ARGUMENTS FOR HEARING OUTSIDE OF BRIEF; DRAFT OBJECTION TO MOTION FOR CONTINUANCE OF HEARING; DRAFT RESPONSE TO OBJECTIONS PLEADING; CORRESPONDENCE TO ██████████ RE SAME.	3.90 Hrs	\$185/hr	\$721.50
01/11/08 SRS	REVIEW CORRESPONDENCE FROM ██████████ AND BRIEFLY REVIEW REVISIONS TO OBJECTIONS.	0.20 Hrs	\$185/hr	\$37.00
01/14/08 SRS	REVISE OBJECTION TO MOTION FOR RECONSIDERATION IN LIGHT OF CLIENT'S CHANGES; FINALIZE SAME; REVISE OBJECTION TO CONTINUANCE AND RESPONSE TO DEFENDANT'S OBJECTIONS; FINALIZE SAME; CORRESPONDENCE TO ██████████ RE SAME; REVIEW NEW SUBPOENAS THAT CARROLL INTENDS TO ISSUE AGAINST CITIBANK; CORRESPONDENCE TO ██████████ RE SAME.	0.60 Hrs	\$185/hr	\$111.00
01/14/08 LMES	REVIEW EMAIL CORRESPONDENCE RE NEW SUBPOENAS FROM DEBTOR; REVIEW SUBPOENAS.	0.30 Hrs	\$135/hr	\$40.50
01/15/08 LMES	BEGIN DRAFT OF PROTECTIVE ORDER, MEMORANDUM IN SUPPORT, AFFIDAVIT, AND NOTICE OF HEARING.	0.60 Hrs	\$135/hr	\$81.00
01/16/08 LMES	DRAFT MOTION, MEMORANDUM IN SUPPORT, AFFIDAVIT, AND NOTICE RE PROTECTIVE ORDER.	1.00 Hrs	\$135/hr	\$135.00
01/17/08 SRS	REVIEW REPLY BRIEF IN OPPOSITION TO MOTION FOR FINAL JUDGMENT AND ADDITIONAL BRIEF FILED IN SUPPORT OF MOTION FOR RECONSIDERATION; CORRESPONDENCE TO CLIENT RE SAME.	0.50 Hrs	\$185/hr	\$92.50

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

01/18/08 SRS	DRAFT REPLY IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF FINAL JUDGMENT; TELEPHONE CONFERENCE WITH ██████████ RE SAME; DRAFT SUPPLEMENTAL AFFIDAVIT OF S. SCHWAGER IN SUPPORT OF SAME; CORRESPONDENCE TO ██████████ RE SAME; REVIEW RESPONSE IN REPLY; REVISE AND FINALIZE REPLY AND AFFIDAVIT.	5.20 Hrs	\$185/hr	\$962.00
01/18/08 LMES	FINISH DRAFT OF MOTION, MEMORANDUM IN SUPPORT, AFFIDAVIT, AND NOTICE RE PROTECTIVE ORDER.	2.40 Hrs	\$135/hr	\$324.00
01/22/08 SRS	REVISE, FINALIZE AND FILE MOTION, MEMORANDUM, HEARING NOTICE, AND AFFIDAVIT IN SUPPORT OF PROTECTIVE MOTION REGARDING DEFENDANT'S POST SUMMARY JUDGMENT ORDER DISCOVERY REQUESTS; CORRESPONDENCE WITH ██████████ RE NEW FILINGS BY CARROLL.	1.50 Hrs	\$185/hr	\$277.50
01/23/08 SRS	TELEPHONE CONFERENCE WITH ██████████ RE PENDING HEARING AND ISSUES RE SAME.	0.20 Hrs	\$185/hr	\$37.00
01/23/08 LMES	TELEPHONE CONFERENCE WITH COURT RE DATE FOR HEARING ON MOTION FOR PROTECTIVE ORDER; FINISH DRAFT OF NOTICE AND FINALIZE ALL DOCUMENTS FOR FILING.	0.50 Hrs	\$135/hr	\$67.50
01/24/08 SRS	WORK ON PREPARATION FOR HEARING RE MOTION FOR RECONSIDERATION AND MOTION FOR ENTRY OF FINAL JUDGMENT; ATTEND HEARING RE SAME; CORRESPONDENCE TO CLIENT RE RESULTS OF HEARING; WORK ON SUPPLEMENTAL FEES.	3.30 Hrs	\$185/hr	\$610.50
01/25/08 SRS	CORRESPONDENCE WITH ██████████ RE HEARING ISSUES; TELEPHONE CONFERENCE WITH ██████████ RE SAME.	0.40 Hrs	\$185/hr	\$74.00

CITICAPITAL COMMERCIAL CORPORATION  
41834-0007

01/25/08

LMES	DRAFT SUPPLEMENT TO MOTION FOR ATTORNEY FEES; DRAFT SUPPLEMENTAL AFFIDAVIT; DRAFT PROPOSED ORDER ON JANUARY TWENTY FOURTH HEARING.	2.30 Hrs	\$135/hr	\$310.50
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Total Legal Services:		----- 27.70 Hrs		----- \$4,719.50
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Legal Services Summary

SHEILA R. SCHWAGER	19.60 hours at	\$185.00 =	\$3,626.00
LOREN MESSERLY	8.10 hours at	\$135.00 =	\$1,093.50

Client Charges  
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OVERNIGHT DELIVERY			
12/20/07 OVERNIGHT DELIVERY - FEDERAL EXPRESS			25.25
CORPORATION SHIPMENT IDAHO COUNTY			\$25.25

Total Client Charges			----- \$25.25
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TOTAL THIS BILL			----- \$4,744.75
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