IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED. Plaintiff,

- against -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

Lead Case No. 02-C-5893 (Consolidated)

CLASS ACTION

Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

HOUSEHOLD DEFENDANTS' MOTION TO COMPEL RESPONSES TO DEFENDANTS' **INTERROGATORIES NOS. 56 AND 64**

Defendants Household International, Inc. and Household Finance Corp. and its former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar ("Defendants") hereby move pursuant to Fed. R. Civ. P. 37(a)(2)(B) for the Court to compel responses to Household Defendants' interrogatories Nos. 56 and 64 for the reasons stated in the accompanying Memorandum of Law.

-2-

Dated: May 4, 2007

Chicago, Illinois

EIMER STAHL KLEVORN & SOLBERG LLP

By: /s/ Adam B. Deutsch
Nathan P. Eimer
Adam B. Deutsch
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
(312) 660-7600

-and-

CAHILL GORDON & REINDEL LLP

Thomas J. Kavaler
Howard G. Sloane
Landis C. Best
Patricia Farren
David R. Owen
80 Pine Street
New York, NY 10005
(212) 701-3000

Attorneys for Defendants Household International, Inc, Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J. A. Vozar