

Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (referred to collectively herein as “Defendants”), respectfully move for an order modifying this Court’s June 29, 2007 scheduling Order regarding expert discovery.¹ In support of this consent motion, Defendants state as follows:

1. Plaintiffs served Defendants with three expert witness reports on August 15, 2007.

2. Thereafter defense counsel requested additional time from Plaintiffs’ counsel for Defendants’ experts to complete review of Plaintiffs’ reports and supporting material, and to prepare their own submissions.

3. Plaintiffs’ counsel consented to a three (3) week enlargement of time for service of Defendants’ expert witness reports, and proposed commensurate adjustments to the remaining expert discovery deadlines, which were acceptable to Defendants.

4. Thus, the parties have agreed, subject to the Court’s approval, to a brief extension of the expert discovery schedule as follows: Defendants to disclose experts and reports by November 5, 2007; Plaintiffs to disclose rebuttal reports by December 5, 2007; expert discovery and depositions to conclude by January 11, 2008.

¹

The Court’s June 29, 2007 Order required that: Plaintiffs produce their expert reports by August 15; Defendants produce their expert reports by October 15; Plaintiffs produce their rebuttal reports by November 15; and that expert discovery and depositions conclude by December 21, 2007.

WHEREFORE, Defendants respectfully request that the expert discovery schedule be enlarged as set forth herein. Plaintiffs' counsel has consented to this relief and does not oppose the granting of this motion.

September 20, 2007

Chicago, Illinois

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