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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 DISCOVERY PURSUANT TO RULE 26(A)(1)(C) AND THIS COURT'S ORDERS, OR IN THE ALTERNATIVE FOR A RECOMMENDATION OF PRECLUSION

For the reasons stated in the accompanying Memorandum of Law, 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 the Court to compel discovery pursuant to Rule 26(a)(1)(C) and this Court's Orders, or in the alternative for a recommendation of preclusion.

October 5, 2007

New York, NY

Respectfully submitted,

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By: /s/ David R. Owen

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-and-

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