

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

<p>LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;"><i>- against -</i></p> <p>HOUSEHOLD INTERNATIONAL, INC., ET AL.,</p> <p style="text-align: right;">Defendants.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Lead Case No. 02-C-5893 (Consolidated)</p> <p>CLASS ACTION</p> <p>Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan</p>
--	---	---

**MEMORANDUM IN SUPPORT OF THE HOUSEHOLD
DEFENDANTS' MOTION FOR AN EXTENSION OF TIME TO
DISCLOSE THEIR EXPERT WITNESS REPORTS**

CAHILL GORDON & REINDEL LLP
80 Pine Street
New York, New York 10005
(212) 701-3000

EIMER STAHL KLEVORN & SOLBERG LLP
224 South Michigan Ave.
Suite 1100
Chicago, Illinois 60604
(312) 660-7600

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

Defendants respectfully ask the Court to extend to December 10, 2007 their deadline to file their expert reports and supplement any interrogatory answers that depend on expert analysis. Despite the best efforts of Defendants' recently-retained rebuttal experts, the three-week extension originally offered by Plaintiffs and so-ordered by the Court proved to be insufficient, largely due to the sheer volume of material that the experts must review and analyze before they can prepare comprehensive reports. Annexed as Exhibit A are submissions of three of Defendants' experts explaining the need for more time to complete their analysis of the expert reports and supporting material produced by Plaintiffs on August 15, 2007, and the large volume of background data required to understand Plaintiffs' positions in context and frame appropriate responses.¹

After expending years in pursuing a program of massive, one-sided discovery, following every conceivable detour, and now relying almost exclusively on expert witnesses to articulate every aspect of their claims, Plaintiffs cannot seriously claim to be prejudiced by the requested short adjournment. In contrast, Defendants would be seriously prejudiced if their experts were forced to compress their analysis into what has turned out to be an artificially tight timeframe. The interests of justice, including the goal of framing this case for a prompt resolution, will be best served by adopting an even-handed schedule that will allow the experts to complete their reports in a professional manner.

Background

On August 15, 2007, after years of seeking extensions of their time to explain their contentions, Plaintiffs served three lengthy expert reports with voluminous accompanying materials that collectively purport to analyze every element of Plaintiffs' three theories of securities fraud. A brief overview of these reports is annexed as Exhibit B. When this Court origi-

¹

Defendants may submit expert reports from witnesses in addition to those identified in the accompanying statements.

nally set a 45 day deadline for responsive reports, it could not have predicted the wide breadth and immense level of detail of Plaintiffs' submissions, which include:

- 846 pages of the experts' principal opinions and analysis with attached exhibits;
- 12,967 pages of documents produced in this case and adopted by reference in one or more of the expert reports (not counting approximately 5,450 pages of referenced deposition exhibits);
- 119 transcripts in their entirety of testimony elicited in this case and others;
- CD ROMS containing a total of 8,432 pages of "non-case specific" material, background material concerning the experts, and additional supporting material.

Plaintiffs' experts have had the luxury of months or years to prepare these expansive reports. Various employees of Plaintiffs' accounting experts have been attending depositions over the course of the past year-and-a-half, and the expert Plaintiffs retained on "predatory lending" and other issues disclosed that she had been developing her opinion for more than a year.

Given the sheer breadth and volume of the reports and accompanying material — and the fact that Defendants' experts lack the parties' close familiarity with the massive discovery record in this matter — it soon became evident that the October 15, 2007 deadline was unrealistic. Defendants therefore asked Plaintiffs to consent to an eight-week extension. When Plaintiffs offered an extension of only three weeks, Defendants accepted it, subject to the Court's approval, in the sincere hope of avoiding motion practice by meeting the tight new deadline of November 5, 2007.

Although Defendants' experts have been working diligently to meet that deadline, it has become clear that additional time is necessary for them to complete their analysis of tens-of-thousands of pages of material subsumed in Plaintiffs' submissions, and countless documents, transcripts, press releases, news articles, analyst reports, etc. that are not included in Plaintiffs' submissions, in order to conduct their own independent analyses of the wide range of topics covered in Plaintiffs' expert reports. The difficulty of this task is magnified by the size of the discovery record in this matter and the fact that the class period covers approxi-

mately 800 separate trading days. (*See generally* the accompanying statements of Mukesh Bajaj, Carl LaSusa, and Roman Weil, annexed as Exhibit A.)

Further (and although this is not the primary basis for this motion), Defendants' experts will need adequate time to evaluate Plaintiffs' upcoming submission as to the calculation and approximate value of their alleged damages, which will not be produced until a few business days before the current rebuttal deadline. As the Court recognized in its October 17, 2007 minute order, Plaintiffs should have provided this key information no later than August 15, 2007, but failed to do so.²

Plaintiffs can demonstrate no prejudice from the short requested extension. They may argue that the current schedule must be maintained in order to complete expert discovery before the current January 14, 2008 status conference before Judge Guzman, but there is no magic to that date. January 14 was selected by Judge Guzman during the parties' last appearance before him because it was the first available date after the expected close of expert discovery that suited the schedules of counsel and the Court. Judge Guzman did not order that expert discovery be completed before that date, and he has always made clear that he will defer to this Court for scheduling and supervision of expert discovery.

This Court has previously indicated its willingness to extend the expert discovery schedule should the parties and their experts require more time.³ Based on the reasonable and

² During recent exchanges with Plaintiffs' counsel to try to resolve this scheduling issue, counsel for Plaintiffs indicated that they planned to provide the missing damages information before the new deadline of October 31, 2007. Even if they do so, Plaintiffs' failure to comply on August 15 has still unreasonably compressed the time for Defendants' experts to review, analyze, and incorporate this new information into their expert analysis.

³ At the status conference held on January 24, 2007, Defendants raised their concern as to whether more time would be required for expert discovery:

Ms. Best: Because, again, I just - without knowing the specifics of how many experts they're going to have, it's difficult to know whether 45 days is enough for -

The Court: And if you need more time - if you need more time, you're going to come in, okay, and you're going to tell me. . . . (Relevant portions of the Transcript attached hereto as Exhibit C)

Footnote continued on next page.

good faith needs of Defendants' experts, and Plaintiffs' inability to articulate any real prejudice from allowing Defendants a short additional extension, Defendants respectfully request that their deadline to disclose their expert reports and submit any expert-based supplemental interrogatory answers be extended from November 5, 2007 to December 10, 2007.

CONCLUSION

For the foregoing reasons, Defendants respectfully request that the deadline for Defendants' expert reports be extended to December 10, 2007, and that the expert discovery schedule be modified accordingly. A proposed draft order setting forth a proposed new expert discovery schedule is attached hereto at Exhibit E for the Court's consideration.

October 22, 2007
New York, New York

Respectfully submitted,

By: /s/ Landis C. Best

CAHILL GORDON & REINDEL LLP
Thomas J. Kavalier
Howard G. Sloane
Landis C. Best
David R. Owen
80 Pine Street
New York, NY 10005
(212) 701-3000

-and-

Footnote continued from previous page.

Also, at the status conference held on August 10, 2006, the Court stated: "So we won't - all we're going to adopt from the schedule is - and the summary judgment would be up to Judge - that would all be Judge Guzman anyway, so I wouldn't be setting those dates. But we'll figure out - we'll give HFC plenty of equal time on whatever these expert dates are." (Relevant portions of the transcript attached hereto as Exhibit D).

EIMER STAHL KLEVORN &
SOLBERG LLP

Nathan P. Eimer

Adam B. Deutsch

224 South Michigan Avenue

Suite 1100

Chicago, Illinois 60604

(312) 660-7600

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

Exhibit A

LECG

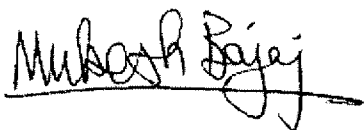
AFFIDAVIT

I am a financial economist and the Managing Director of the securities practice at LECG, LLC. LECG is an international consulting firm specializing in economics and financial analysis. On June 20, 2007, I was retained by counsel for Household International Inc. ("Household" or the "Company") to review and comment on the expert report of Professor Daniel Fischel (the "Fischel Report") dated August 15, 2007, served by Plaintiffs in this case.

Professor Fischel's conclusions are based on an event study, which entails the review of news and analyst reports concerning Household, the broad market and peers in the same industry *for each day over the Class Period (July 30, 1999 – October 11, 2002), i.e., for more than 800 trading days*. On any given day, there may be several events that potentially impact a company's stock price. Hence, an independent review of Professor Fischel's analysis would require me to thoroughly review all news, press releases, analyst reports and other documents obtained through discovery for these 800-odd days. Such a review is expected to be time-consuming. I understand that there are over 800 analyst reports on Household during this period, more than 2,000 news articles, more than 70 deposition transcripts with over 3,500 exhibits and thousands of other case documents produced in discovery that I and/or my staff might have to review.

Accordingly, I beg the Court to allow me until December 10, 2007 to complete my expert report.

Respectfully submitted,



Mukesh Bajaj

October 22, 2007

Carl A. LaSusa

Telephone: (773) 774-0997
E-Mail: clsconsult1@aol.com

Carl A. LaSusa Consulting, LLC

*P.O. Box 46133
Chicago, Illinois 60646-0133*

Honorable Nan Nolan
U.S. Magistrate Judge
Everett McKinley Dirksen Bldg.
219 S. Dearborn Street
Chicago, Il. 60604

Re: Household International

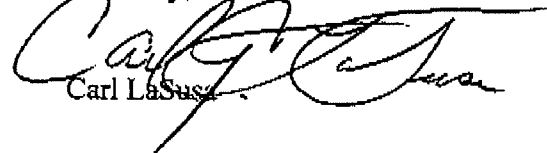
Dear Judge Nolan:

My name is Carl LaSusa. During the time period relevant to this action, I was the Supervisor of the Consumer Credit Division of the Illinois Department of Financial Institutions. I currently operate a consulting business. I have been retained as an expert witness by counsel for Household International, Inc. ("Household") to review and respond to the expert report of Catherine A. Ghiglieri (the "Ghiglieri Report"), dated August 15, 2007, served on Defendants by Plaintiffs in this action.

To effectively review the Ghiglieri Report and prepare my response, I have read and become familiar with the content of the report itself. It is also necessary, however, that I review the supporting materials cited and relied upon in the Ghiglieri Report. These supporting materials include thousands and thousands of pages, comprised of deposition transcripts, deposition exhibits, documents produced in this case, as well as documents outside of this case, including comment letters, bulletins, manuals, testimony extraneous to this case, and many other sorts of documents. I must also consult numerous additional materials to make a proper response to the Ghiglieri Report. Reviewing all of these materials is an extremely time consuming process, but is necessary in order for me to effectively prepare my response.

I am endeavoring to work quickly, but I must balance this extraordinary project with my commitments to other clients. I therefore respectfully request that the Court allow me until December 10, 2007 to complete my review and response to Ms. Ghiglieri's report.

Sincerely,


Carl LaSusa

ROMAN L. WEIL
Suite 306
600 N. Kingsbury Street
Chicago IL 60610

312.944.5229
Fax: 206.202.2114
RomanWeil@yahoo.com

22 October, 2007

Hon. Nan Nolan
U.S. Magistrate Judge
Everett McKinley Dirksen Bldg.
219 S. Dearborn Street
Chicago IL 60604

In re: Household International Matter

Dear Judge Nolan:

My name is Roman L. Weil. I am Ph.D., CMA, CPA, and V. Duane Rath Professor of Accounting at the Graduate School of Business of the University of Chicago. Counsel for defendants has retained me in this matter to opine on accounting issues and some other things. Counsel asked me to review expert reports served by Plaintiffs in this case—particularly the reports of Harris Devor and Catherine Ghiglieri—and to prepare a responsive report.

I note that Plaintiffs expert reports and their exhibits contain much text and supporting exhibits. In preparing my response, I am referring to materials beyond Plaintiffs' reports and their exhibits, including deposition transcripts, deposition exhibits, discovery documents, and outside texts. This process requires time during the peak of the teaching season for someone, like me, who teaches basic financial accounting to newly matriculated students.

Accordingly, I request that the Court to allow me until December 10, 2007, after my students have taken their final examinations, to complete my report.

Sincerely,

A handwritten signature in black ink that reads "Roman L. Weil". The signature is written in a cursive, flowing style.

Roman L. Weil

Exhibit B

OVERVIEW OF PLAINTIFFS' REPORTS

A. The Devor Report

Mr. Devor states in his report that he was engaged by Plaintiffs to “opine on whether the consolidated financial statements . . . for the quarter ended June 30, 1999 through the quarter ended June 30, 2002, as well as for the fiscal years ended December 31, 1999, 2000, and 2001 . . . as originally presented by Household and HFC, were fairly stated in accordance with generally accepted accounting principles.” As noted above, Mr. Devor’s accounting firm has been involved in this case for some time and his employees have attended more than a dozen depositions in this case.

At 148 pages in length (excluding appendices), the Devor Report addresses several years’ worth of Household’s consolidated financial statements and purports to analyze all three theories of recovery asserted by Plaintiffs in this case. Within each of these three principal topics, the report delves into a myriad of subtopics such as: “Specific Improper Lending Practices”; “Account Management Techniques Impact 2+ Delinquency Rate”; “Manipulation of Charge-offs”; “Impact of Account Management Techniques on the Loan Loss Reserve Calculation and Related Disclosures”; among others.

“Exhibit 3” of the Devor Report contains a partial listing of “Other Materials Relied Upon.” This extensive list includes of approximately 6,500 pages of documents produced in this matter, as well as 69 deposition transcripts, comprising thousands of pages of transcripts and related exhibits. Also appended to the Devor Report is a CD ROM containing copies of the non-case specific materials, including “non-specific case documents”; “analyst reports”; and “accounting, auditing and other guidance.” These documents include, *inter alia*, an over-100 page declaration of a former state commerce commissioner; 23 analyst reports, and 28 documents concerning accounting and auditing guidance.

B. The Ghiglieri Report

Catherine A. Ghiglieri purports to “opine on whether or not Household engaged in predatory lending practices as alleged in the plaintiff investors’ complaint, as well as review and opine on delinquency and charge-off practices during the 1999-2002 timeframe.” Her report is 169 pages in length, plus extensive appendices. Even a casual review of its contents confirms that it has been in preparation for some time.

Ms. Ghiglieri purports to present as her own “expert opinion” every aspect of Plaintiffs’ entire case on predatory lending and restructuring topics. Many “explanations” that Plaintiffs refused to provide in interrogatory responses (even some that were ordered by this Court) are finally provided by Ms. Ghiglieri. Her report recites allegations, anecdotes and claims against Defendants concerning a wide and diverse array of topics. Many of the subjects Ms. Ghiglieri addresses are being raised for the first time in her report.

“Appendix C” of the Ghiglieri Report contains a long list of the documents on which Ms. Ghiglieri reportedly relied. This listing includes 35 articles, comment letters, regulatory bulletins and manuals, prepared statements and testimony, 36 deposition transcripts and approximately 200 related exhibits, and over 6,400 pages of documents produced in this litigation.

C. The Fischel Report

Daniel R. Fischel purports to “analyze the economic evidence as it relates to [Plaintiffs’] claims, determine whether it is consistent with these claims, and, if so, analyze the amount of alleged artificial inflation in Household’s stock price during the Class Period attributable to such claims.” While the narrative portion of the Fischel Report is only 28 pages, it incorporates 57 exhibits, including charts covering hundreds of individual trading days and related materials that Fischel prepared or assembled to support his opinion. In addition to listing hundreds of his own prior writings, Fischel also includes copies of some 400 pages of other materials on which he reportedly relied..

Exhibit C

14:45:56

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LAWRENCE E. JAFFE PENSION Case No. 1:02-cv-5893
PLAN, on behalf of itself
and all others similarly Chicago, Illinois
situated,

Plaintiffs, January 24, 2007
Status Conference

v.

HOUSEHOLD INTERNATIONAL,
INC., et al.,

Defendants.

TRANSCRIPT OF STATUS CONFERENCE
BEFORE THE HONORABLE NAN R. NOLAN
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiff: Miller Law, LLC
By: Lori A. Fanning
101 N. Wacker Dr., Ste. 2010
Chicago, IL 60606
(312) 525-8316

- and -

Lerach, Coughlin, Stoia, Geller,
Rudman & Robbins, LLP
By: Luke O. Brooks
100 Pine St., Ste. 2600
San Francisco, CA 94111
(415) 288-4545

1
2 APPEARANCES (Cont'd):

3 For the Defendant: Eimer, Stahl, Klevorn &
4 Solberg, LLP
5 By: Adam B. Deutsch
6 224 S. Michigan Ave., Ste. 1100
7 Chicago, IL 60604
8 (312) 660-7600

9 - and -

10 Cahill, Gordon & Reindel
11 By: Landis C. Best
12 80 Pine Street
13 New York, NY 10005
14 (212) 701-3000

15 - and -

16 Cahill, Gordon & Reindel
17 By: Craig S. Ketsch,
18 David R. Owen, and
19 Ira J. Dembrow
20 80 Pine Street
21 New York, NY 10005
22 (212) 701-3000
23 (Via telephone.)

24
25 Court Reporter: April M. Metzler, RPR, CRR
219 South Dearborn St., Rm. 2318-A
Chicago, IL 60604
(312) 408-5154

26 Proceedings recorded by mechanical stenography;
27 transcript produced by notereading.

17:07:40 1 MR. BROOKS: We may have an industry expert.

17:07:42 2 THE COURT: Okay.

17:07:44 3 MR. BROOKS: We likely will have an

17:07:46 4 accounting expert.

17:07:46 5 THE COURT: Okay.

17:07:46 6 MR. BROOKS: And there are some others up in

17:07:48 7 the air that I'm not sure about.

17:07:50 8 THE COURT: So you might have four. Okay.

17:07:52 9 MR. BROOKS: I think four or five, Judge.

17:07:54 10 THE COURT: Four or five.

17:07:54 11 Okay. And, Ms. Best?

17:07:56 12 MS. BEST: Well, your Honor, we are unsure

17:08:00 13 because our experts are going to be primarily based upon

17:08:02 14 the experts that they are going to be putting in their

17:08:04 15 case in chief. They are the plaintiffs in the case.

17:08:06 16 They've indicated that a lot of their claims are based

17:08:10 17 upon expert testimony.

17:08:10 18 So we're not in a position to say how many

17:08:14 19 or what our experts will be until we understand exactly

17:08:18 20 who their experts are going to be on what subjects. And

17:08:20 21 we've got three general categories here, but there may

17:08:24 22 be four or five -- there may be additional ones I'm

17:08:26 23 hearing.

17:08:28 24 THE COURT: So do you have any -- at the

17:08:30 25 present moment, do you have any category that's not in

17:13:36 1 THE CLERK: The 17th will be the 45 days, so
17:13:38 2 the Friday after the 17th?

17:13:38 3 THE COURT: What is that then?

17:13:40 4 THE CLERK: The 24th.

17:13:42 5 THE COURT: Well, when's the 17th?

17:13:42 6 THE CLERK: The 17th is a Friday.

17:13:44 7 THE COURT: Yeah, the 17th, okay, August 17.

17:13:48 8 All depositions by August 17th.

17:13:56 9 And if we need to amend it, we'll amend it,
17:13:58 10 okay, but at least you've got a goal there. Okay?

17:14:04 11 You've got a goal.

17:14:06 12 MS. BEST: Because, again, I just -- without
17:14:06 13 knowing the specifics of how many experts they're going
17:14:10 14 to have, it's difficult to know whether 45 days is
17:14:14 15 enough for --

17:14:14 16 THE COURT: And if you need more time -- if
17:14:16 17 you need more time, you're going to come in, okay, and
17:14:20 18 you're going to tell me why. But at least I think that,
17:14:24 19 you know, this gets us -- they wanted us through by
17:14:26 20 May 31st, and if we're finished by August -- by
17:14:30 21 mid-August and send you back to Judge Guzman by that
17:14:34 22 time.

17:14:34 23 Okay. We need another status. So are you
17:14:44 24 in Chicago -- you're in Chicago again on --

17:14:46 25 MS. BEST: We're in Chicago a lot.

Exhibit D

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

TRANSCRIBED FROM DIGITAL RECORDING

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

LAWRENCE E. JAFFE, Pension Plan, on) No. 02 C 5893
behalf of itself and all others)
similarly situated, and GLICKENHAUS)
INST GRP.,)
)
Plaintiffs,)
)
vs.)
)
HOUSEHOLD INTERNATIONAL, INC., ARTHUR)
ANDERSEN, L.L.P., W F ALDINGER, and)
D A SCHOENHOLD,) Chicago, Illinois
) August 10, 2006
Defendants.) 10:11 A.M.

TRANSCRIPT OF PROCEEDINGS - Motions
BEFORE THE HONORABLE NAN R. NOLAN, Magistrate Judge

APPEARANCES:

For the Plaintiffs: LERACH, COUGHLIN, STOIA, GELLER,
RUDMAN & ROBBINS, LLP
100 Pine Street
Suite 2600
San Francisco, California 94111
BY: MS. AZRA Z. MEHDI

MILLER, FAUCHER AND CAFFERTY, LLP
30 North LaSalle Street
Suite 3200
Chicago, Illinois 60602
BY: MR. MARVIN ALAN MILLER

PAMELA S. WARREN, CSR, RPR
Official Court Reporter
219 South Dearborn Street
Room 1928
Chicago, Illinois 60604
(312) 294-8907

**NOTE: Please notify of correct speaker identification.
DUE TO STATIC ON THE RECORDING PORTIONS ARE UNINTELLIGIBLE OR
INAUDIBLE.**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES: (Continued)

For Defendant Household: CAHILL, GORDON & REINDEL, LLP
80 Pine Street
New York, New York 10005-1702
BY: MR. DAVID R. OWEN
MR. JASON HALL

EIMER, STAHL, KLEVORN & SOLDBERG, LLP
224 South Michigan Avenue
Suite 1000
Chicago, Illinois 60604
BY: MR. ADAM B. DEUTSCH

1 of the work I have done on the case or anything else, you just
2 say that, and -- you know, there is a couple -- I have one now
3 that's just huge. And the people from Arnold Porter were
4 telling me that there is some guy in New York who settled --
5 who is the big class action person -- class action mediator who
6 settled all the claims from 9-11?

7 MR. MILLER: Feinberg?

8 THE COURT: Yeah, I think that's who -- because they
9 were talking about maybe trying to get him or something. Do
10 you -- do you have anybody you work with?

11 MR. OWEN: In terms of mediators?

12 THE COURT: Uh-huh.

13 MR. OWEN: We have used an outside mediator, a former
14 federal Judge in California once already.

15 THE COURT: (Unintelligible)?

16 MS. MEHDI: That's --

17 MR. OWEN: No, that's Layn Phillips.

18 MS. MEHDI: Judge Layn Phillips.

19 THE COURT: Okay.

20 MR. OWEN: And we mediated with him in the past.

21 THE COURT: Right.

22 MR. OWEN: And also with Guzman. We're certainly not
23 opposed to --

24 THE COURT: Okay. Well, sounds goods.

25 So we won't -- all we're going to adopt from the

1 schedule is -- and the summary judgment would be up to
2 Judge -- that would all be Judge Guzman anyway, so I wouldn't
3 be setting those dates.

4 But we'll figure out -- we'll give HFC plenty of equal
5 time on whatever these expert dates are. Okay?

6 MR. OWEN: Uh-huh. With respect to one thing, I --
7 the (unintelligible) has in there a September 15th verification
8 under oath production of documents.

9 THE COURT: I don't have -- wait a minute.

10 Oh, yes. Defendants complete production of responsive
11 documents and verify the completion under oath.

12 MR. OWEN: Well, we oppose that, your Honor. We think
13 that's not warranted. We have produced, you know, close to 5
14 million documents in this case. We have told them already that
15 we're done with the ordinary collection of documents. The only
16 thing that remains really is --

17 THE COURT: All right.

18 MR. OWEN: -- (unintelligible) that we do before each
19 deposition. And obviously the deposition (unintelligible) will
20 be taking place after the verification. But they say they
21 need -- and we think that it really is just a recipe for
22 motions and for gotcha litigation.

23 MS. MEHDI: Your Honor, I would like to address that.

24 THE COURT: Okay.

25 MS. MEHDI: This Court has given us 55 depositions.

Exhibit E

**UNITED STATES DISTRICT COURT
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

ORDER

The expert discovery schedule, previously amended on September 21, 2007, is further amended as follows: Defendants to disclose experts and reports by December 10, 2007; Plaintiffs to disclose rebuttal reports by January 7, 2007; expert discovery and depositions to conclude by February 7, 2008. The parties are to follow this revised schedule in providing supplemental responses to discovery requests based on the expert reports.

Dated:

Entered:

NAN R. NOLAN
United States Magistrate Judge