

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

FILED

JAN 13 2004

MICHAEL W. DOBINS
CLERK, U.S. DISTRICT COURT

LAWRENCE E. JAFFE, Pension Plan)
and on behalf of all others)
similarly situated,)
)
Plaintiff,)
)
v.)
)
HOUSEHOLD INTERNATIONAL, INC.)
ARTHUR ANDERSEN, L.L.P,)
)
Defendants.)

No. 02 C 5893

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

DOCKETED
JAN 14 2004

NOTICE OF FILING

To: Counsel on the Attached Service List

PLEASE TAKE NOTICE that on January 13, 2004, we filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, the *Plaintiffs' Response to the Defendant Banks' Motion for Leave to File Supplemental Authority in Support of their Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint*, a copy of which is hereby served upon you.

Dated: January 13, 2004


Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

I, Marvin A. Miller, one of the attorneys for plaintiffs, hereby certify that I caused the *Plaintiff's Response to the Defendant Banks' Motion for Leave to File Supplemental Authority in Support of Their Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint* to be served upon all counsel on the attached service list by placing a copy of the same in the United States Mail at 30 North LaSalle Street, Chicago, Illinois this 13th day of January, 2004.



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

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LAWRENCE E. JAFFE PENSION PLAN, On)
Behalf of Itself and All Others Similarly)
Situated,)

Plaintiff,)

vs.)

HOUSEHOLD INTERNATIONAL, INC., et)
al.,)

Defendants.)

JAN 13 2004 10

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

No. 02 C 5893
(Consolidated)

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**PLAINTIFFS' RESPONSE TO THE DEFENDANT BANKS' MOTION
FOR LEAVE TO FILE SUPPLEMENTAL AUTHORITY
IN SUPPORT OF THEIR MOTION TO DISMISS THE
CORRECTED AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Plaintiffs respectfully submit this response to the Defendant Banks' Motion for Leave to File Supplemental Authority in support of their Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint.

1. Plaintiffs do not object to the Defendant Banks notifying the Court of the recent decision in *In re Global Crossing, Ltd. Sec. Litig.*, No. 02 Civ 910 (GEL) (S.D.N.Y. Dec. 18, 2003), in support of their motion to dismiss, and submitting such decision to the Court.

2. Plaintiffs object to the Defendant Banks' submission of additional arguments, which are four pages long, in support of their motion. Briefing on defendants' motion was completed on July 21, 2003. Now, more than five months after the completion of the briefing on the motion to

dismiss, the Bank Defendants belatedly seek to supplement previously made arguments, thereby attempting to get multiple bites of the apple.

3. Accordingly, plaintiffs respectfully request that this Court disregard the Bank Defendants' arguments on pages 2-4 of their Motion for Leave to File Supplemental Authority.

DATED: January 13, 2004

Respectfully submitted,



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