

**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

**DEFENDANTS' MOTION *IN LIMINE* TO EXCLUDE OR
LIMIT 14 CATEGORIES OF EVIDENCE**

Defendants Household International, Inc. ("Household"), William F. Aldinger, David A. Schoenholz and Gary Gilmer (collectively, the "Household Defendants" or "Defendants"), hereby move pursuant to Local Rule 16.1(a) for an Order or Orders to preclude Plaintiffs from introducing into evidence or limiting at trial all references to the following 14 categories of evidence:

- A. The SEC Consent Decree
- B. Federal and State Regulatory Examinations
- C. Complaints in Other Litigations
- D. Civil and Regulatory Settlements
- E. Settlement-Related Refunds
- F. Settlement-Related Policy Changes
- G. Individual Customer Complaints
- H. Elaine Markell Opinion
- I. The Unauthorized Video Created by Dennis Hueman

- J. The Deposition of Former State Regulator Charles Cross
- K. Memoranda Relating to Consultant Andrew Kahr
- L. "Project Whiskey" Due Diligence and Related Documents
- M. References to Defendants' Invocations of Privilege
Concerning Ernst & Young Engagement
- N. The Restatement

In addition, with Plaintiffs' consent, Defendants request that the Court endorse the attached Stipulation and [Proposed] Order Regarding Briefing Schedule, dated January 29, 2009.

Dated: January 30, 2009
New York, New York

CAHILL GORDON & REINDEL LLP

By: /s/ Thomas J. Kavalier
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William F. Aldinger, David A. Schoenholz,
Gary Gilmer and J. A. Vozar

Defendants.

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**STIPULATION AND [PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE**

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WHEREAS, pursuant to the schedule set by the Court regarding the Pretrial Order, the parties are to file motions *in limine* (including motions to exclude or limit expert testimony under the standards set forth in *Daubert* or otherwise) by January 30, 2009;

WHEREAS, the parties intend to file such motions on January 30, 2009;

WHEREAS, the parties are to appear before this Court for an initial final Pretrial Conference on February 17, 2009 at 10:00am and wish to have the motions fully submitted to the Court at that time;

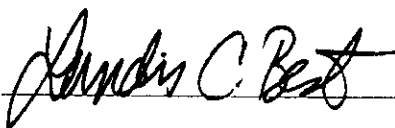
IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, through their undersigned counsel of record, that the following briefing schedule apply to the motions filed on January 30:

1. Responses due on Tuesday, February 10;
2. Replies due on Friday, February 13.

DATED: January 29, 2009

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

By: 

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APPROVED AND HEREBY ORDERED THIS ____ day of _____, 2009.

Honorable Ronald A. Guzman,
United States District Judge