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

LAWRENCE E. JAFFE PENSION PLAN, ON	
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,	) Lead Case No. 02-C5893
	(Consolidated)
Plaintiff,	
against	) CLASS ACTION
- against -	) Judge Ronald A. Guzman
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	Magistrate Judge Nan R. Nolan
Defendants.	) )
	)

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that, on February 17, 2009, we shall appear before Judge Ronald A. Guzman in Room 1219 of the Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, and shall then and there present Defendants' Motion *in Limine* to Exclude or Limit 14 Categories of Evidence,

- A. The SEC Consent Decree;
- B. Federal and State Regulatory Exams;
- 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 and Testimony Relating to Andrew Kahr;
- L. "Project Whiskey" Due Diligence and Related Documents;
- M. References to Privilege Concerning the Ernst & Young Engagement; and
- N. The Restatement.

Respectfully submitted,

## CAHILL GORDON & REINDEL LLP

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