

**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) <u>CLASS ACTION</u> Judge Ronald A. Guzman
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**HOUSEHOLD DEFENDANTS’
DAUBERT MOTION TO EXCLUDE THE “EXPERT”
TESTIMONY OF DANIEL FISCHEL**

Defendants Household International, Inc. and its former officers and directors William F. Aldinger, David A. Schoenholz and Gary Gilmer (“Defendants”) hereby move pursuant to Federal Rule of Evidence 702 for an Order precluding Plaintiffs from offering for any purpose, at trial or otherwise, the testimony of Daniel Fischel for the reasons stated in the accompanying Memorandum of Law.

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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Inc, Household Finance Corporation, William F.
Aldinger, David A. Schoenholz, Gary Gilmer and J.
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

-----X		
LAWRENCE E. JAFFE PENSION PLAN, ON	:	
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY	:	
SITUATED,	:	Lead Case No. 02-C-5893
	:	(Consolidated)
	:	
Plaintiff,	:	CLASS ACTION
	:	
- against -	:	Judge Ronald A. Guzman
	:	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	:	
	:	
Defendants.	:	
	:	
-----X		

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

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