

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

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
Plaintiff,)	<u>CLASS ACTION</u>
vs.)	Judge Ronald A. Guzmán
HOUSEHOLD INTERNATIONAL, INC., et)	Magistrate Judge Nan R. Nolan
al.,)	
Defendants.)	
_____)	

**LEAD PLAINTIFFS’ MOTION TO STRIKE INADVERTENTLY FILED DEFENDANT-
DESIGNATED CONFIDENTIAL DOCUMENTS**

Lead Plaintiffs respectfully request that the Court enter an Order striking from the public record the following inadvertently filed Defendant-designated confidential documents: *Exhibits B, H¹, K and O to the Declaration of D. Cameron Baker in Support of Plaintiffs’ Memorandum in Opposition to Household Defendants’ Daubert Motion to Exclude the Expert Testimony of Catherine A. Ghiglieri*. [Docket Numbers 1429-3, 1429-10, 1429-13 and 1429-17, respectfully]. In support thereof, Lead Plaintiffs state as follows:

¹ This motion applies to Exhibit H-2 (Docket 1429-10). Exhibit H-1(1429-9) was previously ordered deleted from the record on February 12, 2009. (Docket 1435).

1. Defendant-designated confidential documents *Exhibit B, Rebuttal Report of Catherine A. Ghiglieri* (Docket No. 1429-3); *Exhibit H-2, Household Report – Part 2* (Docket No. 1429-10); *Exhibit K, Expert Report of Roman L. Weil* (Docket No. 1429-13); and *Exhibit O, Joint Report Pursuant to Federal Rule of Civil Procedure 26 of John L. Bley and Carl A. LaSusa* (Docket No. 1429-17) to the Declaration of D. Cameron Baker in Support of Plaintiffs' Memorandum in Opposition to Household Defendants' Daubert Motion to Exclude the Expert Testimony of Catherine A. Ghiglieri were inadvertently filed.

2. Lead Plaintiffs will seek leave of the Court to re-file the documents under seal pursuant to the protective order in this matter and the Federal Rules of Civil Procedure and Local Rules of the Northern District of Illinois.

WHEREFORE, Lead Plaintiffs respectfully request that the Court grant their Motion to Strike Inadvertently Filed Defendant-Designated Confidential Documents and enter an Order striking from the public record inadvertently filed Defendant-designated confidential documents, *Exhibit B, Rebuttal Report of Catherine A. Ghiglieri* (Docket No. 1429-3); *Exhibit H-2, Household Report – Part 2* (Docket No. 1429-10); *Exhibit K, Expert Report of Roman L. Weil* (Docket No. 1429-13); and *Exhibit O, Joint Report Pursuant to Federal Rule of Civil Procedure 26 of John L. Bley and Carl A. LaSusa* (Docket No. 1429-17) to the Declaration of D. Cameron Baker in Support of Plaintiffs' Memorandum in Opposition to Household Defendants' Daubert Motion to

Exclude the Expert Testimony of Catherine A. Ghiglieri.

DATED: February 12, 2009

Respectfully submitted,

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/s/ Lori A. Fanning

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