

**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-C-5893
)	(Consolidated)
Plaintiffs,)	
- against -)	CLASS ACTION
HOUSEHOLD INTERNATIONAL, INC., ET AL.,)	
)	Judge Ronald A. Guzmán
Defendants.)	

**DEFENDANTS’ MOTION FOR LEAVE TO FILE *INSTANTER*
MEMORANDUM OF LAW IN EXCESS OF FIFTEEN PAGES**

Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz and Gary Gilmer (collectively, “Defendants”), by and through their attorneys, hereby move this Court for leave to file their Memorandum of Law in Support of Defendants’ Motion for New Trial Pursuant to Rule 59 of not more than 116 pages, a copy of which is attached hereto. In support of their application to exceed the 15-page limit, Defendants state as follows:

1. The accompanying Memorandum of Law sets forth arguments in favor of granting Defendants a new trial, drawn from extensive pretrial proceedings and motion practice and from the testimony and evidence presented over the course of more than five weeks of trial.

2. While Defendants have attempted to address fairly and completely and as efficiently as possible the numerous factual and legal issues addressed in the accompanying Memorandum of Law, any further reduction would impact the quality and clarity of the presentation made to the Court.

WHEREFORE, for the reasons stated above, Defendants respectfully request that they be granted leave to file a Memorandum of Law in excess of fifteen pages.

Dated: July 20, 2009

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

By: /s/ Thomas J. Kavalier

Thomas J. Kavalier
Bar No. 1269927
Howard G. Sloane
Bar No. 1197391
Patricia Farren
Bar No. 1198498
Susan Buckley
Bar No. 1198696
Landis C. Best
David R. Owen

80 Pine Street
New York, New York 10005
(212) 701-3000

- and-

EIMER STAHL KLEVORN & SOLBERG LLP
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
(312) 660-7600

*Attorneys for Defendants Household
International, Inc., William F. Aldinger,
David A. Schoenholz and Gary Gilmer*