

**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,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

STIPULATION AND [PROPOSED] ORDER MODIFYING
THE NOVEMBER 5, 2004 PROTECTIVE ORDER

WHEREAS, on November 5, 2004, the Court entered a Protective Order that allows amendments by agreement of counsel to the parties and subject to the Court's approval (*see* attached); and

WHEREAS, absent class member the Putnam Group of Funds¹ and non-class member Putnam Investment Management (collectively "Putnam") wish to clarify and ensure that documents and testimony containing sensitive and competitive business information, such as Putnam's proprietary trading strategies, are covered by the definition of "Confidential Information" as set forth in paragraph 3 the Protective Order.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties in the above-captioned action as follows:

Paragraph 3 of the Protective Order shall be modified to add an additional category to the types of "Confidential Information." Paragraph 3 shall be modified to add: "and (14) any sensitive or competitive business information of any Producing Party, including, but not limited to, information related to the Producing Party's trading strategy or decision making process."

¹ George Putnam Fund of Boston, Putnam Asset Allocation: Balanced Portfolio, Putnam Asset Allocation: Conservative Portfolio; Putnam Asset Allocation: Growth Portfolio; Putnam Balanced Retirement Fund, Putnam Growth and Income Fund II, Putnam Equity Income Fund, Putnam Fund for Growth & Income, Putnam Investors Fund, and Putnam Voyager Fund.

DATED: May 4, 2011

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Attorneys for Defendants

* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE RONALD A. GUZMAN
UNITED STATES DISTRICT JUDGE

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Diego, State of California, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 655 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on May 4, 2011, declarant served by electronic mail and by U.S. Mail to the parties the following documents:

STIPULATION AND [PROPOSED] ORDER MODIFYING THE NOVEMBER 5, 2004 PROTECTIVE ORDER to the parties' e-mail addresses as follows:

TKavaler@cahill.com PSloane@cahill.com PFarren@cahill.com LBest@cahill.com DOwen@cahill.com JHall@cahill.com Mrakoczy@skadden.com	Rstoll@skadden.com NEimer@EimerStahl.com Jtheis@eimerstahl.com Ldegrand@degrandwolfe.com TWolfe@degrandwolfe.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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and by U.S. Mail to:

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David R. Scott, Esq.
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108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of May, 2011, at San Diego, California.



Karen E. Cook