

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

LAWRENCE E. JAFFE PENSION PLAN, On ) Behalf of Itself and All Others Similarly ) Situating, )  Plaintiff, )  vs. )  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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**[PROPOSED] ORDER SETTING SCHEDULE FOR CLAIMS ADJUDICATION AND**  
**CLASS NOTICE**

This matter having come before the Court at a status conference held on January 27, 2012 and Counsel for Lead Plaintiffs and all defendants having appeared at that time;

IT IS HEREBY ORDERED:

1. That on or before February 27, 2012, defendants shall enumerate those claims listed on Exhibits A and B of the report filed by Gilardi & Co. LLC ("Gilardi") on December 22, 2011, to which they object either in terms of (a) calculation of the amount; (b) submission of the claim without proper authority of the actual class member; (c) incompleteness, duplication of another claim, or suffers from some mechanical deficiency in the claim submission itself. In connection with each such objection, defendants shall enumerate the claim number of the challenged claim and provide a claim-by-claim explanation or analysis of the basis for their objections.

2. That on or before March 28, 2012, plaintiffs shall respond to defendants' objections to the extent that the parties are unable to resolve the objections.

3. That this Court will conduct a status conference on April \_\_, 2012 to (a) discuss the need to refer any claims adjudication issues to the United States Magistrate Judge for resolution; (b) discuss the schedule for Lead Plaintiffs to file a motion seeking the entry of a final judgment incorporating all the adjudicated or agreed-upon claim amounts, if any, and a schedule for defendants' objections to Lead Plaintiff's proposed final judgment; and (c) discuss other next steps, including what the parties believe needs to be done at that point.

4. While the parties are engaged in the above-described procedures, the Court will endeavor to issue its ruling on the question of the defendant's rebuttal of the presumption of reliance.

5. That Lead Counsel for the Class may submit, for the Court's review and approval, a proposed notice to all claimants on or before February 21, 2012 (a) advising the Class of Lead Counsel's intention to file an application for approval of fees and expenses and reimbursement of expenses of Lead Plaintiffs; and (b) advising all claimants who have received rejection letters from

the claims administrator that their claims will be rejected absent further order of this Court. Lead Counsel for the Class will provide defendants with a draft of the proposed notice on or before February 6, 2012 for their review. The parties will meet-and-confer before February 17, 2012 in an effort to reach agreement on the content of the notice. If the parties are unable to reach agreement on the content of the notice, Lead Counsel for plaintiffs may submit their proposed notice on February 21, 2012 and defendants will be permitted to file objections to Lead Counsel's proposal on or before February 28, 2012.

6. That defendants will be permitted to raise any objections to plaintiff's proposed final judgment, including any issues pursuant to Federal Rule of Civil Procedure 50, which have not previously been ruled upon.

IT IS SO ORDERED.

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE RONALD A. GUZMAN  
UNITED STATES DISTRICT JUDGE

Submitted by:

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Approved as to content and form:

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

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 January 31, 2012, declarant served by electronic mail and by U.S. Mail to the parties the following documents:

[PROPOSED] ORDER SETTING SCHEDULE FOR CLAIMS ADJUDICATION AND  
CLASS NOTICE

The parties' e-mail addresses are 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 Ldegrand@degrandwolfe.com TWolfe@degrandwolfe.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.  
Law Offices of Lawrence G. Soicher  
110 East 59th Street, 25th Floor  
New York, NY 10022

I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of January, 2012, at San Diego, California.

s/ Deborah S. Granger  
DEBORAH S. GRANGER