

**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.)	
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**PLAINTIFFS' MOTION FOR AN ORDER TO CONTINUE THE HEARING DATE ON
LEAD PLAINTIFFS' AND LEAD COUNSEL'S FEE AND EXPENSE APPLICATIONS**

Lead Plaintiffs' and Lead Counsel's Motion for An Award of Attorneys' Fees and Expenses ("Fee and Expense Application") is currently set for hearing on March 19, 2014. Pursuant to ¶7 of the Court's November 18, 2013 Order (Dkt. 1912), Lead Plaintiff and Lead Counsel respectfully request that the Court adjourn the hearing until a date in September 2014 for the reasons set forth herein.

On November 18, 2013, the Court approved a Notice to be sent to Class Members that had valid claims and were parties to the October 17, 2013 Judgment. Docket No. 1912. The Notice informed these Class Members that Lead Plaintiffs and Lead Counsel would be filing an application for attorneys' fees and expenses. Pursuant to the Order, the claims administrator, Gilardi & Co. LLC mailed the Notice directly to all Class Members who provided mailing addresses with their claim. Declaration of Michael Joaquin ("Joaquin Decl."), ¶3, filed herewith. Gilardi mailed the Notice to the claimants' last known address. Gilardi received 507 envelopes back as undeliverable because of a change of address. The United States Postal Service was able to provide Gilardi with updated address information for 169 of these Class Members. Gilardi re-sent the Notice to these 169 Class Members on or before January 14, 2014, and none of these Notices have been returned as undeliverable. Joaquin Decl., ¶5. However, 338 of these Class Members had left no forwarding address with the Post Office. *Id.*, ¶6. Lead Counsel has started the process of trying to locate these 338 claimants. Since these claimants did not receive the Notice, further effort should be made to provide Notice so they have an opportunity to respond to the Application. Lead Counsel believes it can complete the process of locating and mailing a new, updated Notice to these 338 claimants by June 15, 2014. Lead Counsel respectfully requests that the 338 claimants should be told they have until August 7, 2014 to file any objection to the Motion.

The Motion can be heard in September 2014 at the Court's convenience. Plaintiffs propose the attached updated Notice (Ex. A attached) be used for these purposes. The only changes

contained in this updated Notice from the Notice approved by the Court on November 18, 2013 are to update the specific information included in plaintiffs' application filed on December 31, 2013 (pg. 3); the fact that defendants filed an appeal (pgs. 3, 4); the hearing date (pg. 4); the new deadline for third-party filers (pg. 5); and the deadline (August 7, 2014) for any objection to be submitted by any of these 338 Class Members (pg. 5). Defendants do not oppose the Motion.

DATED: March 10, 2014

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL J. DOWD (135628)
SPENCER A. BURKHOLZ (147029)
DANIEL S. DROSMAN (200643)
LAWRENCE A. ABEL (129596)
MAUREEN E. MUELLER (253431)

s/ Spencer A. Burkholz
SPENCER A. BURKHOLZ

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
LUKE O. BROOKS (90785469)
JASON C. DAVIS (253370)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)

Lead Counsel for Plaintiffs

MILLER LAW LLC
MARVIN A. MILLER
LORI A. FANNING
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603
Telephone: 312/332-3400
312/676-2676 (fax)

Liaison Counsel

DECLARATION OF SERVICE

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 March 10, 2014, declarant served by electronic mail to the parties listed below the following documents:

**PLAINTIFFS' MOTION FOR AN ORDER TO CONTINUE THE HEARING DATE
ON LEAD PLAINTIFFS' AND LEAD COUNSEL'S FEE AND EXPENSE APPLICATIONS**

The parties' e-mail addresses are as follows:

Tkavaler@cahill.com	Zhudson@bancroftpllc.com
Pfarren@cahill.com	Mrakoczy@skadden.com
Dowen@cahill.com	Rstoll@skadden.com
Jhall@cahill.com	Mmiller@MillerLawLLC.com
Pclement@bancroftpllc.com	Lfanning@MillerLawLLC.com

I declare under penalty of perjury that the foregoing is true and correct. Executed this 10th day of March, 2014, at San Diego, California.

Deborah S. Granger

DEBORAH S. GRANGER