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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,

Plaintiffs,

v.

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

Lead Case No. 02-C-5893 (Consolidated)

CLASS ACTION

Judge Ronald A. Guzman

DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION FOR RECONSIDERATION OF THE COURT'S MARCH 20, 2014 ORDER ON PLAINTIFFS' MOTION FOR ENTRY OF BILL OF COSTS

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Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz and Gary Gilmer ("Defendants") submit the following in response to Plaintiffs' Motion for Reconsideration of the Court's March 20, 2014 Order on Plaintiffs' Motion for Entry of Bill of Costs. (Dkt. 1993.)

On March 20, 2014, the Court entered an order on Plaintiffs' Motion for Entry of Bill of Costs (the "Order"). (Dkt. 1992.) The Order held, in part, that Plaintiffs were not entitled to recover costs in the amount of \$105,016.25 for payments made to Cahill Gordon & Reindel LLP ("Cahill") in connection with costs incurred for exemplification and copies. On the instant motion, Plaintiffs raise a factual error in the Order and request that the Court reconsider the portion of its Order denying Plaintiffs recovery of costs associated with payments made to Cahill.

Defendants respectfully submit this Response to state that they have no opposition to Plaintiffs' Motion for Reconsideration as to that particular aspect of the Court's Order. Cahill Gordon & Reindel, LLP served as trial counsel for Defendants in this matter and the component of Plaintiffs' Motion for Entry of Bill of Costs seeking the recovery of \$105,016.25 for payments made to Cahill for exemplification and copying costs is not an item for which an objection has been advanced. Defendants therefore agree to the limited correction of the Order that Plaintiffs request.

Respectfully submitted,

DATED: March 25, 2014

<u>/s/ Thomas J. Kavaler</u> Patricia Farren Jason M. Hall Thomas J. Kavaler CAHILL GORDON & REINDEL LLP 80 Pine Street Case: 1:02-cv-05893 Document #: 1996 Filed: 03/25/14 Page 3 of 3 PageID #:70329

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