

**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)
Plaintiff,	)	
	)	CLASS ACTION
v.	)	
	)	Judge Ronald A. Guzmán
HOUSEHOLD INTERNATIONAL, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**JOINT AGREED MOTION TO CONTINUE DISCOVERY  
OF “LIST 2 CLAIMANTS” THROUGH OCTOBER 31, 2014**

The parties, by and through undersigned counsel, respectfully move the Court, on a joint and agreed basis, to continue through October 31, 2014 the discovery efforts directed to individuals, entities, accounts and funds who previously answered “yes” to the claim form question (the so-called “List 2 Claimants”). In support of this motion, the parties jointly state as follows:

1. The Court previously adopted the schedule jointly proposed by the parties for the pursuit of discovery with respect to the List 2 Claimants and, in accordance with those procedures, Household has issued interrogatories and document requests to those claimants. The parties have, through counsel, conferred regarding the objections and responses received to date, and those efforts continue.

2. On December 10, 2013, this Court adopted the parties’ proposed schedule for discovery with respect to the List 2 Claimants, according to which such discovery was to be completed by August 29, 2014. In light of the discovery proceedings to date, and in an effort to attempt to make further progress on discovery matters before having to present contested discovery issues

to the Court, the parties jointly agree that would be best to continue the discovery schedule October 31, 2014.

3. Undersigned counsel for Household has conferred with counsel for plaintiffs, Michael J. Dowd, and has been authorized to represent that plaintiffs join in this motion and agree to the entry of an order granting the relief requested herein.

WHEREFORE, the parties respectfully request, on an agreed and joint basis, the entry of an order continuing through October 31, 2014 the discovery efforts directed to individuals, entities, accounts and funds who previously answered “yes” to the claim form question (the so-called “List 2 Claimants”).

Dated: June 20, 2014

Respectfully submitted,

/s/ Mark E. Rakoczy

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**CERTIFICATE OF SERVICE**

Mark E. Rakoczy, an attorney, hereby certifies that on June 20, 2014, he caused true and correct copies of the foregoing Agreed Motion to be served via the Court's ECF filing system on the following counsel of record in this action:

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