

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN,)		
on Behalf of Itself and All Others Similarly)		
Situated,)		Case No. 02 C 5893
Plaintiff,)		
)		Judge Jorge L. Alonso
)		
v.)		
)		
HOUSEHOLD INTERNATIONAL, INC.,)		
et al.,)		
)		
Defendants.)		

**AGREED MOTION FOR CANCELATION, RELEASE,
AND DISCHARGE OF DEFENDANTS' SUPERSEDEAS BOND**

The parties to this action, through their undersigned counsel, respectfully move, on an agreed basis and by stipulation, for an Order canceling, releasing, and discharging the Supersedeas Bond that Defendants posted in connection with their appeal to the Seventh Circuit Court of Appeals. In support of this motion, the parties state as follows:

1. The parties to this action, through their counsel, hereby stipulate and consent that, by reason of the Seventh Circuit Court of Appeals having reversed the judgment that was issued by the District Court on October 17, 2013, and the Seventh Circuit's mandate having been issued and docketed on July 9, 2015 (Dkt. No. 2019), the Supersedeas Bond that was posted on November 12, 2013 in connection with Defendants' appeal of the judgment is now subject to cancellation, release, and discharge.

2. The Supersedeas Bond consists of Bond No. 285045785 posted by Liberty Mutual Insurance Company in the amount of \$750,000,000; Bond No. 105901684 posted by Travelers Casualty and Surety Company of America in the amount of \$400,000,000.00; Bond No.

82297281 posted by Federal Insurance Company in the amount of \$500,000,000; Bond Number K08896707 posted by Pacific Employers Insurance Company in the amount of \$100,000,000; Bond No. K08896690 posted by Westchester Fire Insurance Company in the amount of \$66,348,175.67; Bond No. CGB09123027 posted by Zurich American Insurance Company in the amount of \$400,000,000; and Bond No. 912124 posted by National Union Fire Insurance Company of Pittsburgh, Pa. in the amount of \$250,000,000.00), as Sureties, severally, in the referenced case, in the total bond amount of \$2,466,348,175.67, at the request of defendant Household International, Inc., as Principal. (Dkt. No. 1905.)

WHEREFORE, the parties respectfully request that the Court enter an Agreed Order, submitted herewith, ordering that the Supersedeas Bond is no longer required and is hereby fully and unconditionally discharged, released and exonerated and that the aforesaid Sureties are hereby released from any and all past, present and future liability in connection with the issuance of the Supersedeas Bond, and directing the Clerk of the Court to return the canceled Supersedeas Bond to counsel for Defendants. In accordance with this Court's Case Management Procedures, the parties have emailed a proposed agreed order to Proposed_Order_Alonso@ilnd.uscourts.gov.

Dated: August 3, 2015

Respectfully submitted,

/s/ R. Ryan Stoll
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on August 3, 2015, he caused true and correct copies of the foregoing Agreed Motion for Cancellation, Release, and Discharge of Supersedeas Bond to be served via the Court's ECF filing system on the following counsel of record in this action:

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