

**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,)	
) Honorable Jorge L. Alonso
vs.)	
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
)

NOTICE OF PLAINTIFFS' MOTIONS *IN LIMINE*

PLEASE TAKE NOTICE that on May 18, 2016, at 11:00 a.m. or as soon as practical thereafter, we shall appear before the Honorable Judge Jorge L. Alonso in Courtroom 1700 of the Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, and shall present the following Plaintiffs' Motions *in Limine*:

- Motion *in Limine* No. 1 Plaintiffs' Motion *in Limine* to Permit Plaintiffs to Present Evidence of the Fraud
- Motion *in Limine* No. 2 Plaintiffs' Motion *in Limine* to (1) Preclude Defendants from Relitigating Falsity, Materiality, Scierter and Reliance; (2) Deem the Findings from the Prior Proceedings Uncontested; and (3) Preclude Reference to Dismissed Statements
- Motion *in Limine* No. 3 Plaintiffs' Motion *in Limine* to Request that the Court Apply Evidentiary Rulings from the First Trial to the Retrial
- Motion *in Limine* No. 4 Plaintiffs' Motion *in Limine* to Bar (1) Testimony or Evidence Concerning Allegedly Company-Specific Non-Fraud Information that Purportedly Distorted Professor Fischel's Leakage and Specific Disclosures Models; (2) Testimony or Argument that Fischel's Leakage Model Is Not a Valid Method for Quantifying Artificial Inflation; (3) Use of Materials by Defendants' Experts that Are Not Cited in the Experts' Reports, and (4) Cumulative Testimony
- Motion *in Limine* No. 5 Plaintiffs' Motion *in Limine* to Object to Defendants' Proposed Verdict Form, Including Their "Question One" and Their Attempt to Add "Defendants' Specific Disclosures Model" as an Option for the Jury to Select in Determining Damages
- Motion *in Limine* No. 6 Plaintiffs' Motion *in Limine* to Preclude Fact Witnesses from Offering Impermissible Opinion Testimony
- Motion *in Limine* No. 7 Plaintiffs' Motion *in Limine* to Preclude Defendants from Calling the Lead Plaintiff or Introducing Class Members' Trading Records and Related Information at Trial
- Motion *in Limine* No. 8 Plaintiffs' Motion *in Limine* to Bar Evidence of or Reference to Aggregate Damages to the Class
- Motion *in Limine* No. 9 Plaintiffs' Motion *in Limine* to Permit Plaintiffs to Offer Certain Prior Trial Testimony of Dr. Mukesh Bajaj

DATED: April 22, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for counsel of record denoted on the attached Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 22, 2016.

s/ Luke O. Brooks

LUKE O. BROOKS

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