

- G. Evidence relating to the due diligence conducted by Wells Fargo in connection with a 2002 proposed but uncompleted merger between Wells Fargo and Household (code-named “Project Whiskey”) and Household’s internal communications regarding Project Whiskey
- H. Evidence regarding an alleged 2001 “purge” by Household of documents relating to certain of its lending practices
- I. Other nonpublic documents regarding Household’s alleged predatory lending and re-aging practices

In support of this motion, Defendants have submitted herewith an accompanying memorandum of law that explains the bases for excluding each of these categories of evidence.

WHEREFORE, Defendants respectfully request that the Court grant their Motion *In Limine* No. 1 To Exclude Evidence Not Relevant to Causation Or Inflation.

Dated: April 22, 2016

Respectfully submitted,

/s/ R. Ryan Stoll

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CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on April 22, 2016, he caused true and correct copies of the foregoing Defendants' Motion *In Limine* No. 1 To Exclude Evidence Not Relevant to Causation Or Inflation to be served via the Court's ECF filing system on the following counsel of record in this action:

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