

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On) Behalf of Itself and All Others Similarly) Situating,) Plaintiff,) vs.) HOUSEHOLD INTERNATIONAL, INC., et) al.,) Defendants.) _____)	)	Lead Case No. 02-C-5893 (Consolidated) <u>CLASS ACTION</u> Honorable Jorge L. Alonso
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**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

1. Class Representatives Glickenhau & Co. (“Glickenhau”), PACE Industry Union-Management Pension Fund (“PACE”) and International Union of Operating Engineers Local No. 132 Pension Plan (“IUOE”) (collectively, “Plaintiffs”) hereby move the Court for entry of an Order: (1) preliminarily approving the Stipulation of Settlement dated June 17, 2016; (2) certifying the Class for settlement purposes; (3) approving the form and method for providing notice of the settlement to Class Members; and (4) scheduling a final Settlement Hearing.

2. This motion is based upon the Stipulation of Settlement and all Exhibits attached thereto, the Memorandum of Points and Authorities in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement, the Order Preliminarily Approving Settlement and Providing for Notice (“Notice Order”), all other pleadings and matters of record, and such additional evidence or argument as may be presented at the hearing.

Accordingly, Plaintiffs request that the Court enter the Notice Order.

DATED: June 20, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 20, 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 June 20, 2016.

s/ Michael J. Dowd

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