

**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. )	
	)

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**LEAD PLAINTIFFS' MOTION FOR LEAVE TO FILE AN OVERSIZED BRIEF IN  
SUPPORT OF MOTION FOR AN AWARD OF ATTORNEYS' FEES AND EXPENSES  
AND REASONABLE COSTS AND EXPENSES FOR LEAD PLAINTIFFS**

Lead Plaintiffs, through their attorneys, respectfully move the Court pursuant to Local Rule 7.1 for leave to file a memorandum of law of up to 29 pages in length in support of Lead Plaintiffs' Motion for an Award of Attorneys' Fees and Expenses and Reasonable Costs and Expenses for Lead Plaintiffs ("Memorandum"). In support thereof, Lead Plaintiffs state as follows:

1. On June 24, 2016, this Court entered an order preliminarily approving the parties' Stipulation of Settlement executed June 17, 2016, and requiring that, *inter alia*, all opening briefs and supporting documents in support of the settlement, the Plan of Allocation, and any application by Class Counsel for attorneys' fees and expenses or by Plaintiffs for their expenses be filed and served by August 29, 2016. Dkt. No. 2215.

2. On or before August 29, 2016, Lead Plaintiffs intend to move for an award of attorneys' fees and reasonable expenses. Lead Plaintiffs' Memorandum will detail why the fee award sought by Class Counsel is fair, reasonable, and adequate. The Memorandum will include a review of the extensive work performed by Class Counsel and Lead Plaintiffs during the course of this fourteen-year litigation, as well as an analysis of the relevant case law. Due to the extraordinary length and complexity of this litigation, Lead Counsel believe that 29 pages is necessary to adequately address these topics, and hereby request leave of the Court to file a Memorandum of that length.

DATED: August 22, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 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 August 22, 2016.

s/ Spencer A. Burkholz  
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