

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

<p>LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">- against -</p> <p>HOUSEHOLD INTERNATIONAL, INC., ET AL.,</p> <p style="text-align: right;">Defendants.</p>	}	<p>Lead Case No. 02-C5893 (Consolidated)</p> <p>CLASS ACTION</p> <p>Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan</p>
---	---	---

**MOTION OF DEFENDANTS (1) DIRECTING THAT PLAINTIFFS
COMPLY WITH THIS COURT’S OCTOBER 26, 2005 DISCOVERY
ORDER; AND (2) FOR A PROTECTIVE ORDER QUASHING
PLAINTIFFS’ MARCH 1, 2006 DEPOSITION NOTICE
BECAUSE IT ADMITTEDLY VIOLATES THAT ORDER**

Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, “Defendants”), hereby move this Court (1) to direct Plaintiffs to comply with the Court’s October 26, 2005 discovery Order, and (2) for a Protective Order quashing Plaintiffs’ March 1, 2006 deposition notice because it admittedly violates that Order. In support of this motion, Defendants submit the accompanying (1) Memorandum of Law and (2) Declaration of Landis C. Best in support thereof.

Dated: March 8, 2006
Chicago, Illinois

Respectfully submitted,

EIMER STAHL KLEVORN & SOLBERG LLP

By: /s/ Adam B. Deutsch

Nathan P. Eimer

Adam B. Deutsch

224 South Michigan Avenue

Suite 1100

Chicago, Illinois 60604

-and-

CAHILL GORDON & REINDEL LLP

Thomas J. Kavalier

Howard G. Sloane

Landis C. Best

David R. Owen

80 Pine Street

New York, NY 10005

(212) 701-3000

*Attorneys for Defendants Household International,
Inc., Household Finance Corporation, William F.
Aldinger, David A. Schoenholz, Gary Gilmer and J.
A. Vozar*

CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on March 8, 2006, he served copies of the Motion of Defendants and Memorandum of Law in Support of Defendants' Motion (1) Directing that Plaintiffs Comply with this Court's October 26, 2005 Discovery Order; and (2) for a Protective Order Quashing Plaintiffs' March 1, 2006 Deposition Notice Because it Admittedly Violates that Order, to the parties listed below via the manner stated.

/s/ Adam B. Deutsch

Adam B. Deutsch

Via E-mail and Fed-Ex

Marvin A. Miller
Lori A. Fanning
MILLER FAUCHER and CAFFERTY LLP
30 North LaSalle Street, Suite 3200
Chicago, Illinois 60602
(312) 782-4880
(312) 782-4485 (fax)

Via E-mail and Fed-Ex

Stanley J. Parzen
Susan Charles
MAYER BROWN ROWE & MAW LLP
71 S. Wacker Drive
Chicago, Illinois 60606
(312) 782-0600
(312) 701-7711 (Fax)

Via E-mail and Fed-Ex

Patrick J. Coughlin
Azra Z. Mehdi
Cameron Baker
Luke O. Brooks
LERACH COUGHLIN STOIA
& ROBBINS LLP
100 Pine Street, Suite 2600
San Francisco, California 94111
(415) 288-4545
(415) 288-4534 (fax)