## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, On Behalf of Itself and All Others Similarly Situated,	) Lead Case No. 02-C-5893 ) (Consolidated)
Plaintiffs,	)
v. HOUSEHOLD INTERNATIONAL, INC.,	<ul><li>Hon. Ronald A. Guzman</li><li>Magistrate Judge Nan R. Nolan</li></ul>
et al.,	)
Defendants.	) )

## MOTION OF DEFENDANT ARTHUR ANDERSEN LLP FOR EXTENSION OF PAGE LIMIT

Defendant Arthur Andersen LLP ("Andersen") respectfully moves this Court for leave to file a memorandum supporting its proposed settlement with the Plaintiff Class of not more than 18 pages. The Court should grant this Motion for the following reasons:

- 1. This is a complex securities fraud class action which the Lead Plaintiffs have filed against multiple defendants. Plaintiffs have articulated several different theories of how they were allegedly defrauded by the different defendants, namely the issuer, Household International, Inc. ("Household") and Household's executives (collectively, the "Household Defendants") and Household's outside auditor for part of the class period, Andersen.
- 2. Andersen has now reached an agreement to settle this matter with the Plaintiff Class, subject to approval of the Court. The proposed settlement is between Andersen and the Plaintiff Class only, and does not involve the Household Defendants.

- 3. Andersen believes that it would be of assistance to the Court for Andersen to submit a memorandum explaining why the proposed settlement is fair, reasonable and adequate, and meets the requirements for approval by the Court.
- 4. Andersen's memorandum would (1) explain the terms of the settlement and the arms-length mediation process through which the settlement was reached, (2) analyze the nature and merit (or lack thereof) of plaintiffs' claims against Andersen, (3) differentiate those claims from the claims against the non-settling Household Defendants, which the Plaintiff Class would remain free to pursue (with Andersen's promised cooperation) following approval of the settlement with Andersen, (4) explain why the proposed settlement is fair, reasonable and adequate given the practical realities of Andersen's present situation, and (5) show that the amount of the agreed settlement payment is consistent with what Andersen has paid in other class action settlements since March 2002 that have been consistently approved by the courts. In addition, Andersen believes that it would assist the Court for Andersen to respond to certain misleading statements that the Household Defendants have made in a memorandum they filed (albeit without standing to do so) regarding the proposed settlement.
- 5. Andersen has struggled to condense its arguments to fit within the Court's normal 15-page limit. Despite great effort, Andersen is unable to do so without compromising its ability to present its arguments in a form that would be most helpful to the Court in this important matter. Andersen believes that it could present its arguments adequately in a brief of not more than 18 pages.

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WHEREFORE, Andersen respectfully requests that it be granted leave to submit a brief of not more than 18 pages in support of approval of the proposed class action settlement.

Dated: March 30, 2006

Respectfully submitted,

s/ Stanley J. Parzen

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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 30, 2006, I caused to be served copies of the foregoing Motion of Defendant Arthur Andersen, LLP For Extension of Page Limit upon the following persons through the CM/ECF system:

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