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

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,

(Consolidated)

CLASS ACTION

Plaintiff,

Judge Ronald A. Guzman

Lead Case No. 02-C-5893

- against -

Magistrate Judge Nan R. Nolan

HOUSEHOLD INTERNATIONAL, INC., ET. AL.,

Defendants.

MOTION OF DEFENDANTS (I) RENEWING THEIR MOTION TO QUASH PLAINTIFFS' MARCH 1, 2006 DEPOSITION NOTICE AND (II) MOVING TO QUASH ALL 13 OF THE NON-PARTY DEPOSITIONS NOTICED AND/OR SUBPOENAED BY PLAINTIFFS

Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, "Defendants"), hereby (1) renew their motion to quash Plaintiffs' March 1, 2006 deposition notice; and (2) move to quash all 13 of the non-party depositions noticed and/or subpoenaed by Plaintiffs on March 7, March 24 and March 29, 2006, because they are in violation of the Court's October 26, 2005 and March 9, 2006 Orders. In support of this motion, Defendants submit the accompanying (1) Memorandum of Law; and (2) Declaration of Joshua M. Greenblatt in support thereof.

-2-

Dated: April 13, 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
(312) 660-7600

-and-

# CAHILL GORDON & REINDEL LLP

Thomas J. Kavaler
Howard G. Sloane
Landis C. Best
David 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 April 13, 2006, he caused to be served a copy of a Memorandum of Law in Support of Defendants (I) Renewed Motion to Quash Plaintiffs' March 1, 2006 Deposition Notice and (II) Motion to Quash all 13 Of The Non-Party Depositions Noticed and/or Subpoenaed by Plaintiffs,, 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

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)

#### 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)