UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED, Plaintiff, - against - HOUSEHOLD INTERNATIONAL, INC., ET AL., Defendants.	Lead Case No. 02-C5893 (Consolidated) CLASS ACTION Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

DEFENDANTS' MEMORANDUM IN OPPOSITION TO PLAINTIFFS' FURTHER STATEMENT REGARDING POST-CLASS PERIOD INFORMATION PURSUANT TO THE COURT'S APRIL 18, 2006 ORDER

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This Memorandum is respectfully submitted on behalf of Defendants Household International, Inc. ("Household"), Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J. A. Vozar (collectively, "Defendants") in opposition to Plaintiffs' Further Statement Regarding Post-Class Period Information Submitted Pursuant to the Court's April 18, 2006 Direction (the "Further Statement").

I. PRELIMINARY STATEMENT

Plaintiffs' Further Statement is the antithesis of the specific justifications this Court directed Plaintiffs to provide for each of their demands for additional discovery covering the 15-month period *after* the termination of the Class Period (*i.e.*, from October 12, 2002 through December 31, 2003). The Court's instructions in this regard could not have been more clear:

> " . . . I want you to take each issue, tell me what it is, tell me why, how it fits into one of [Plaintiffs' three theories of securities fraud] and why you didn't get it in the class period or [why] what you got in the class period . . . . If it's just more of the same, I don't know what we need it for at this moment."

(Transcript of March 9, 2006 Conf. at 59-60) The Court added: "[I]f you're talking about any document that's post class, I'm not going to be too interested in that. If you've got a specific category for a reason, then you should tell us that and *be as specific as you can be*". (Id. at 91; emphasis added) Even though these directives gave Plaintiffs a second chance after the generalities in their earlier submission had been found wanting, the Further Statement merely repackages the same inadequate boilerplate in a chart form, with virtually identical entries for each of the 25 requests in their First, Second and Third Document Demands to Defendants (the "Additional Discovery").[1]

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[1] With regard to Plaintiffs' [Corrected] Third Request for Production of Documents, Defendants served their Objections and Responses on April 12, 2006, and agreed to produce documents in response to a number of Plaintiffs' requests. Plaintiffs waited until almost one week *after* filing their May 2 Further Statement to request a meet and confer regarding their Third Document Demand, which has been scheduled for May 18, 2006. Defendants believe these issues are best addressed, at least initially, through the meet and confer process (as the Court has repeatedly stated). Defendants are surprised that Plaintiffs

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Most of these rubber-stamp explanations are not even plausible. Read generously, they seem to envision a process of discerning past practices and states of mind from a study of minute operational details for consumer loans issued in the months and years after Defendants made allegedly fraudulent statements or omissions that allegedly impacted the sale of securities. Even assuming that the parameters of individual loans were relevant at all to Plaintiffs' securities fraud claims (*but see* below), Plaintiffs cannot deny that the millions of Class Period documents already in hand provide exhaustive contemporaneous information about Household's consumer lending operations during the relevant period. Plaintiffs nowhere explain — as the Court expressly instructed — what specific alleged needs cannot be met from that body of discovery and from the ample post Class Period production Defendants have already promised and made (which Plaintiffs do not even acknowledge in their submission). Instead of identifying specific informational gaps they arguably need to fill, Plaintiffs literally demand a complete re-do, for a later (and irrelevant) time period, of the immensely burdensome and time-consuming discovery accomplished to date. Experience teaches that this futile exercise would be just the beginning, as Plaintiffs would inevitably demand related depositions, needless "spoliation" investigations and other follow up commensurate with the huge scope of the Additional Discovery.

Defendants would be entitled to the Court's protection from such oppression at any stage of the case, especially in view of Plaintiffs' inability to articulate even marginal utility for most of their demands. In this case, however, where an exceptionally broad discovery program is finally drawing to a close, the Court got it exactly right in telling Plaintiffs to pinpoint specific items needed to fill gaps in prior productions so that the already extended period for fact discovery can finally come to an end. It was Plaintiffs' choice to reject this invitation in favor of insisting yet again on full-bore discovery for the post-Class Period. Under these circumstances, Plain-

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have sought relief from the Court as to their Third Document Demand prior to even *initiating* (much less exhausting) that process. Nonetheless, Defendants note that post-Class Period documents for Third Document Demand requests are neither necessary nor relevant to the issues in this case for the same reasons, discussed below, that are applicable to the First and Second Document Demands.

tiffs should not be given a third chance to provide and justify a narrowly-focused request for additional information, and it certainly should not fall on the Court to sift through Plaintiffs' voluminous demands to search for arguably relevant unmet needs. Plaintiffs will not be prejudiced by the summary denial of their overblown additional post-Class Period demands, because as the Court cogently observed at the March 9 conference, "[I]f you can't prove your case with four million pieces of paper, you don't have a case...." (Transcript of March 9, 2006 Conf. at 79)

For the Court's convenience, Defendants are submitting a chart, attached hereto as Appendix A, that provides specific comments on each of the largely repetitive entries in Plaintiffs' Further Statement. To put Plaintiffs' demands in perspective, the balance of this Memorandum will highlight legal developments and considerations of fairness and sound case management that militate strongly against allowing Plaintiffs to conduct another wasteful wave of discovery on issues that have no discernible bearing on their securities fraud claims.

II. ARGUMENT

A. The Supreme Court's Recent Ruling in *Dura* Demonstrates the Lack of Relevance of Many of Plaintiffs' Demands

Plaintiffs' Further Statement makes much of the supposed "dramatic" decline in Household's fortunes as a purported result of the cessation of certain practices in connection with the 2002 settlement Household reached with state attorneys general and the 2003 Consent Order it entered into with the SEC. However, the Supreme Court's holding in *Dura Pharmaceuticals* v. *Broudo*, 125 S. Ct. 1627 (2005), makes clear that Plaintiffs' approach to proving loss causation is fatally flawed. Under the Supreme Court's holding in *Dura*, it is not enough for Plaintiffs to simply allege that the purchase price of Household stock was "artificially inflated" due to a defendant's alleged misrepresentations or omissions. Rather, Plaintiffs must explain *how the loss resulted from disclosure of the alleged fraud*, and distinguish losses that may have been caused

by "changed economic circumstances, changed investor expectations, new industry-specific events or firm-specific facts, conditions, or other events," which are not actionable. *Id. at* 1632.[2]

In light of *Dura*, the focus of a plaintiff's securities fraud case must be on the specific class period at issue. In particular, a plaintiff must now allege *and prove* that: (i) defendants made a prior misrepresentation (or omission); (ii) the misrepresentation (or omission) was corrected, or otherwise made known to the market on a particular date; and (iii) the price of the security declined significantly following the correction. *See id.* at 1634-35. A plaintiff cannot prevail unless it can *prove* the existence of a corrective disclosure followed immediately by a decline in the price of the firm's stock. The Supreme Court in *Dura* rejected a plaintiff's efforts to recover for generalized investor losses arising from "inflated prices" absent a detailed showing that the alleged fraud actually caused any losses. *Id.* The Supreme Court's reasoning on this subject confirms that any change in Household's revenues or profits or operating methods within the 15 months after the conclusion of the Class Period — which is the main basis for Plaintiffs' claimed need for the Additional Discovery — is irrelevant to the satisfaction of Plaintiffs' burden in this securities fraud case. Events and financial developments that occurred at the tail end or even during the 15-month period after the termination of the Class Period are far too remote to be probative in explaining how an alleged loss resulted from the correction of an alleged fraud, as required by *Dura*. Investigating Household's reaging practices and policies after the close of the Class Period would tell Plaintiffs nothing about the validity of Defendants' disclosures during the Class Period and would shed no light on the issue of scienter vis-a-vis decisions made on this or any other subject during the Class Period. In consequence, there is no justification for the enormous additional burden they seek to impose in aid of their discredited "harm by paying inflated prices" theory.

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2 Although Judge Guzman recently denied Defendants' motion to dismiss the Complaint on the basis of *Dura* because of Plaintiffs' failure to properly plead loss causation, that ruling only addressed the sufficiency of the pleading. At trial, Plaintiffs will have to prove loss causation as required by *Dura*. (And there currently is pending before Judge Guzman Defendants' motion for certification of his decision for immediate appeal, pursuant to 28 U.S. C. § 1292(b).)

B. Plaintiffs Have Not Demonstrated the Required Relevance of or Need for Additional Post-Class Period Discovery

In purporting to demonstrate the relevance of additional post-Class Period documents, Plaintiffs rely mainly on two events, the March 19, 2003 Consent Order that Household entered into with the SEC and the October 2002 multi-state AG settlement. Plaintiffs repeatedly invoke one or the other of these events (or rather their factually inaccurate characterization of them), to support the majority of their 25 additional requests for post-Class Period documents. (The Consent Order is the stated basis for eleven of the requests and the AG settlement for twelve requests.)

With respect to the Consent Order, the SEC did not find that Household engaged in impermissible reaging, as Plaintiffs imply. Rather, the Consent Order addresses certain *disclosures* about Household's reage policies, not the practices as such. The cited SEC Order was about prospective disclosure of certain reaging policies and contrary to Plaintiffs' characterization it neither required nor triggered changes in Household's reaging, charge-off and delinquency polices and procedures after its entry. In any event, Defendants have produced the *entire* approximately 2.1 million-page production made by Household to the SEC (which included documents dated after the Class Period) and have agreed, from the very beginning of the discovery process in this case, to produce documents *dated to the present* to the extent that they relate to any state or federal investigation into Household's lending practices and policies, reage practices and policies and/or the earnings restatement (the three issues raised in the Complaint) that took place during the Class Period -- and have done so. (This was in response to Request Nos. 1-3 of Plaintiffs' First Document Demand.) Also, both Arthur Andersen and KPMG, Household's former and present auditors, respectively, have produced thousands of pages of documents to Plaintiffs and Plaintiffs have served deposition subpoenas on Andersen and KPMG representatives.

The other event relied on by Plaintiffs in their attempt to justify the Additional Discovery demands is the October 2002 multi-state AG settlement in which Household agreed to eliminate or modify certain practices. With respect to the settlement, Plaintiffs assert that "The Class is entitled to discover whether Household in fact implemented those changes as well as when and

how the changes were made." (Further Statement, p. 11) Merely repeating this statement serves to refute it. Plaintiffs do not represent the various state attorneys general, who are not members of the Class. Nor do Plaintiffs represent a class of consumers with an interest in monitoring compliance with consensual orders. Plaintiffs most assuredly cannot base their need to discover additional post-Class Period documents from Defendants on some self-appointed status as enforcers of the state attorneys general settlement. In any event, Defendants have already produced thousands of pages of documents relating to the investigation by and the settlement with the state attorneys general, including documents concerning, *inter alia*, implementation and monitoring of, and communications concerning, changes to Household's policies and/or practices following the settlement (including documents dated after the Class Period).

Despite the voluminous production of documents pertaining to the investigation of Household by state attorneys general and the SEC, Plaintiffs have not relied on *any of those documents*, or on *any of the testimony* of the many witnesses they have deposed to date (not to mention the voluminous transcripts of all the depositions that were taken in connection with several alleged predatory lending claims and the SEC investigation and that have already been produced — most of which were held during 2003 and 2004) to even remotely suggest that any additional or similar post-Class Period documents would be relevant to their claims and would assist them in establishing that their claims have merit.

In general, Plaintiffs' requests for post-Class Period documents display Plaintiffs' myopic focus on minute operational details rather than on facts relating to their allegation that Defendants committed securities fraud in connection with public disclosures about their consumer lending practices during the Class Period. For example, Plaintiffs say that they want to compare revenues received by Household after the Class Period from various items, like EZ Pay accounts, discount points, simple premium credit life insurance, etc., as a result of certain post-Class Period changes in these products, with revenues earned from those products during the Class Period. Plaintiffs apparently believe that lower post-Class Period revenues would demonstrate that higher revenues during the Class Period had to be the result of fraudulent practices (not securities fraud, but alleged consumer fraud) during the Class Period. This would be nonsense even if

Plaintiffs could somehow link their consumer fraud focus to loss causation as defined by the Supreme Court. The fact that revenues for specific products might be lower during or at the end of the 15 months after the end of the Class Period could be due to a host of other factors having absolutely nothing to do with fraudulent practices. As the Supreme Court said in *Dura*, with respect to a later lower stock price, "that lower price may reflect, not the earlier misrepresentations, but changed economic circumstances, changed investor expectations, new industry-specific or firm-specific facts, conditions or other events, which taken separately or together account for some of that lower price." 125 S. Ct. at 1632. This is similarly true for any lower revenues that Plaintiffs might possibly find through their requested Additional Discovery. Even if they should find them, they would be devoid of any probative value and do not justify the immense burden that will be imposed on Household in locating and producing them.

C. Compliance with the Additional Discovery Demands Would Impose an Unreasonable Burden on Defendants and Unduly Delay the Resolution of this Case

Plaintiffs' proposed new wave of discovery must be evaluated in the context of the immense and seemingly unfocused discovery program Plaintiffs have conducted to date. During almost two years of fact discovery, Plaintiffs explicitly understood and agreed that documents created both before and after the Class Period would be produced in response to a significant number of their requests,[3] and Defendants have expended thousands of hours at a huge monetary cost collecting, reviewing and producing more than 4 million pages of documents (including documents dated *as far back as 1994* for certain requests and *to the present* for others). Now Plaintiffs want leave to repeat that exercise for 25 additional requests.

As this Court previously noted: "[W]hen a party says this is going to be severely burdensome . . . I do look at relevance in even a different way." (February 15, 2006 Tr. at 34) Plaintiffs' discovery requests are far from narrowly focused forays into the discovery pond.

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[3] *See* Appendix B hereto, setting forth those requests in Plaintiffs' First and Second Document Demands for which Defendants have produced documents outside the Class Period.

They are (and always have been) so overbroad and wide-ranging that there is no one individual at Household, or even one department, from which to collect all responsive documents, and thus no way for Defendants to ensure a complete production responsive to Plaintiffs' document demands without a voluminous and burdensome collection and review process that to date has already taken more than 18 months. For example, Request No. 10 of the First Document Demand, one of the requests for which Plaintiffs now seek post-Class Period documents, seeks "all documents and communications concerning Household's policies and practices relating to loan delinquencies, charge-off and reaging of loans, including all documents provided to or received from Andersen or KPMG regarding loan delinquencies, charge-off and reaging of loans." The breadth of that single request is staggering. And that request is not unique. Request No. 8 of the Second Document Demand seeks "all" post-Class Period documents relating to or reflecting Household's use of discount points in real estate lending. This would require an immense search for documents by Defendants -- all documents relating to the servicing of many Class Period loans after October 2002 and would be totally out of proportion to any conceivable marginal relevance such detail may have. Similarly, the notion that Plaintiffs could detect alleged non-disclosures or fraudulent disclosures in connection with the sale of securities during the Class Period by examining "[a]n entire set of documents that track, analyze or describe prepayment penalties" (Third Document Demand, Request No. 9) after October 2002 is nonintuitive to say the least and it is impossible to discern any legitimate reason for putting Defendants to the enormous burden or replicating their Class Period production on picayune operational detail for a subsequent time period.

If the Court were to allow Plaintiffs the Additional Discovery they seek, Defendants would essentially have to re-do the entire interview, document collection and review process that was necessary to respond to Plaintiffs' document demands to date. This process included interviews of more than 200 individuals, and the collection, review and production of hard-copy and/or electronic documents from approximately 150 individuals and more than 10 departments, and e-mails and attachments for nearly 300 custodians. The Additional Discovery would impose massive costs on Defendants — both financial and in the disruption of the normal business activities of the Household personnel who would be required to participate in the document collec-

tion and production process. The Court recognized that the Additional Discovery could impose a substantial burden on Defendants because of the sheer volume of what was sought: "I don't even know how many new documents this could involve." (Transcript of April 18 2006 Conf. at 58)

Allowance of the Additional Discovery would also result in a massive increase in the scope of the case and a substantial burden on all parties and, especially, on the Court. Defendants would have no alternative but to seek to demonstrate that decreases or changes in revenues following the termination of the Class Period were not the result of the modification or elimination of certain policies or practices challenged by Plaintiffs, but the result of numerous other factors pertaining to the economy in general, the loan industry, the sub-prime loan industry, etc. Expanding the case in this way would be highly unfair to Defendants, who are impatient -- and are entitled -- to bring this case to a head on the merits within a reasonable time and expose the weakness in Plaintiffs' theories. Plaintiffs, in contrast, persist in deferring that showdown indefinitely by demanding excessive information on minute operational details that have no discernible bearing on their securities fraud allegations.

Although the vast documentary record assembled to date is a testament to the Court's patience (to date) and Household's good-faith compliance with Plaintiffs' expansive demands to date -- and although within reason Plaintiffs are entitled to prioritize their discovery programs as they see fit -- at this stage of the case they should not be allowed another broad round of collateral discovery on topics for which they cannot articulate a plausible need -- despite receiving two opportunities to do so. For these purposes it does not matter whether Plaintiffs are reluctant to broach dispositive issues, or are trying to assemble prejudicial-sounding consumer lore to shore up a weak securities fraud case, or are hoping to wear down Defendants' ability and will to litigate, or none of the above. Plaintiffs have exceeded the reasonable fact discovery deadline established and already extended once by the Court, and Defendants respectfully suggest that the remaining discovery time should be used not to pursue a new wave of onerous discovery, but rather to complete their depositions up to the recently set limit of fifty-five; to clean up loose ends in their documentary and written discovery theory initiated over the past two years; and to

cooperate with Defendants' long-delayed depositions of the named Plaintiffs and their investment advisors.

D. The Court Can and Should Reject Plaintiffs' Unreasonable Demands for Additional Discovery

Even if the Court were to believe that the Additional Discovery Plaintiffs seek may *somehow* be relevant and necessary for their claims, as noted above, the burden imposed on Defendants in producing such documents would far outweigh any such minimal or speculative benefits[4] — especially at this late stage in the discovery phase of the litigation.

In *Mr. Frank, Inc.* v. *Waste Management, Inc., et al.*, 1983 WL 1859, at *2 (N.D. Ill. July 7, 1983), the court said: "It is appropriate for the court to step in and limit discovery when it feels that the discovery involved is cumulative, unnecessary, or only marginally relevant or important." Defendants urge the Court to do precisely that here, at this late stage in the document discovery process. Enough is enough. If Plaintiffs are unwilling to voluntarily end or limit their document discovery — and it appears that this definitely is the case here — the Court, it is respectfully submitted, must impose a limit because, as demonstrated herein (and in Appendix A), the Additional Discovery sought by Plaintiffs is, at best, "cumulative, unnecessary, or only marginally relevant or important."

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[4] As the Seventh Circuit has indicated, the mere fact that documents *might* be relevant to issues alleged does not itself allow discovery of documents beyond the Class Period. *See Pommer* v. *Medtest Corp.*, 961 F.2d 620, 625 (7th Cir. 1992) ("[t]he truth (or falsity) of defendants' statements and their materiality, must be assessed *at the time the statements are made*, and not in the light of hindsight") (emphasis added); *see also Searls* v. *Glasser*, 1994 WL 523712 (N.D. Ill. Sept. 23, 1994) (denying plaintiffs' argument that discovery outside the class period could have helped prove the class' securities fraud claim) (annexed as Attachment C to the instant Memorandum); *In re International Business Machines Corporate Securities Litigation*, 163 F.3d 102, 111 (2d Cir. 1998) (district court properly declined to expand time period for discovery given that information sought was only minimally relevant and where compliance would have placed definite burden on defendant).

At the April 18, 2006 status hearing, the Court distinguished one of the cases relied on by Plaintiffs in their initial submission by succinctly noting, "I do not believe in that case that the class had already received four and a half million documents" and, focusing on Plaintiffs' current request, "I don't know what else could be out there that you could conceivably need at the moment . . .". (Transcript of April 18, 2006 Conf. at 59).

Simply put, Plaintiffs apparently still are unable to prove their claims despite being in possession of more than four million pages of documents (that have been made text-searchable by Plaintiffs) and are therefore trying to prolong discovery by any means possible so as to avoid their day of reckoning.[5] This should be obvious to the Court. However, "[a] district court has a duty, of special significance in lengthy and complex cases where the possibility of abuse is always present, to supervise and limit discovery to protect the parties and witnesses from annoyance and excessive expense." *Mr. Frank, Inc.*, 1983 WL 1859, at *1. The Court was correct in being dubious, at best, about what additional documents could be "out there" that Plaintiffs "could conceivably need." (Transcript of April 18, 2006 Conf. at 59) In view of Plaintiffs' continued inability to show precisely and specifically how the Additional Discovery would be relevant to the claims at issue after being provided two opportunities to do so by the Court, imposing such an enormous burden of document production on Defendants at this late stage of discovery is unfair, unwarranted and should not be sanctioned by the Court. *See International Business Machines*, 163 F.3d at 111 (discovery time period would not be expanded where information sought was only minimally relevant and compliance would have placed definite burden on defendant).

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5 It is quite telling that when Defendants offered to meet and confer with Plaintiffs *more than five months ago* about any additional requests for which Plaintiffs reasonably believed documents outside the Class Period should be produced, Defendants never received any response. (*See* Letter of Craig S. Kesch, Esq. to Sylvia Sum, Esq. dated December 7, 2005, attached as Exhibit 6 to the Declaration of Luke O. Brooks submitted in support of Plaintiffs' March 20 Memorandum.)

CONCLUSION

As is evident from the foregoing, Plaintiffs' Further Statement does not contain, as required by the Court, the "specific" reasons for the documents they are requesting, but merely general statements that they wish to see the extent to which two named events might have had an impact on Household's general finances. This in no way satisfies the Court's directives. When stripped of Plaintiffs' inflammatory, conclusory and wholly irrelevant statements that exhibit both a fundamental misunderstanding and mischaracterization of the issues, Plaintiffs have put forth nothing more than speculative claims that the discovery sought *might* go to materiality, scienter and damages — exactly what this Court said was an insufficient basis on which to grant the Additional Discovery (*see* Transcript of April 18, 2006 Conf. at 58) and what the Supreme Court held was insufficient in *Dura*. Defendants accordingly submit that Plaintiffs' Additional Discovery demands should be denied in full.

Dated: May 16, 2006
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CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on May 16, 2006, he caused to be served copies of the Defendants' Memorandum in Opposition to Plaintiffs' Further Statement Regarding Post-Class Period Information Pursuant to the Court's April 18, 2006 Order, to the parties listed below via the manner stated.

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