

**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,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**LEAD PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
HOUSEHOLD DEFENDANTS' [FIFTH] SET OF INTERROGATORIES**

Lead Plaintiffs respectfully request that this Court grant them a short extension of time within which to respond to Household Defendants' [Fifth] Set of Interrogatories (the "Interrogatories"). For the reasons explained below, Lead Plaintiffs seek a short extension until July 19, 2006 to respond to the Interrogatories. Lead Plaintiffs requested this extension from Household Defendants on June 23, 2006 and despite this Court's admonitions regarding professional courtesy at the April 18, 2006 hearing (*see* Exhibit A, attached hereto); the Household Defendants refused this request. (*see* Exhibit B, attached hereto).

In support of their motion Lead Plaintiffs state:

1. On May 26, 2006, defendants served on Lead Plaintiffs their Fifth Set of Interrogatories.
2. Responses to those interrogatories are due June 28, 2006.
3. Over the past three weeks, counsel for Lead Plaintiffs have prepared for and traveled to Chicago to take six depositions and attend the June 15 status hearing. Counsel for Lead Plaintiffs also have prepared three discovery motions to be filed tomorrow. Given the recent deposition and motion schedules, counsel for Lead Plaintiffs have has not had sufficient time to prepare appropriate responses or objections to the Interrogatories. Next week, because of the national July 4th holiday, the work week will be abbreviated.
4. Counsel for Lead Plaintiffs have requested of Household Defendants' counsel an extension until July 19, 2006 to submit responses to the Interrogatories. Lead Plaintiffs have sought no previous extension on these responses.
5. The Household Defendants will not be prejudiced by this short extension since there is currently no discovery closing date. Yet, rather than agreeing to such extension, counsel for the Household Defendants agreed to extend the time to respond, only on the non-negotiable condition

that Lead Plaintiffs waive the right to interpose appropriate objections to the propounded interrogatories. *See* attached Exhibit B detailing the email exchange regarding this issue.

6. With the press of deposition discovery and motion practice and the intervening holiday, there is not sufficient time to complete in proper manner the responses to the Interrogatories.

WHEREFORE, Lead Plaintiffs request that this Court enter its Order extending the time until July 19, 2006 by which Lead Plaintiffs shall serve appropriate responses and/or objections to Defendants' [Fifth] Set of Interrogatories.

DATED: June 28, 2006

Respectfully submitted,

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