

**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.)	
_____)	

**THE CLASS' MOTION TO COMPEL PRODUCTION OF DISCOVERY AND
ISSUANCE OF LETTERS OF REQUEST UNDER THE HAGUE CONVENTION**

For the reasons set forth in the Class' Memorandum of Law in Support of Its Motion to Compel Production of Discovery and Issuance of Letters of Request under the Hague Convention accompanying this motion, lead plaintiffs and the Class respectfully move this Court for: (a) an order compelling defendant Household International, Inc. and its parent company HSBC Holdings plc ("HSBC") to produce and consent to the production of documents held by Morgan Stanley & Co. International Limited, or Morgan Stanley & Co. Limited (collectively, "MSIL"); and (b) the issuance of two Letters of Request under the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, date of signing, March 18, 1970, date in force, October 7, 1972, 23 U.S.T. 2555, T.I.A.S. No. 7444, seeking international judicial assistance in obtaining certain evidence (i) directly from MSIL, an entity located in the United Kingdom and (ii) HSBC, an entity also located in the United Kingdom.

DATED: September 21, 2006

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PATRICK J. COUGHLIN (90785466)
AZRA Z. MEHDI (90785467)
D. CAMERON BAKER (154452)
MONIQUE C. WINKLER (90786006)
LUKE O. BROOKS (90785469)
MARIA V. MORRIS (223903)
BING Z. RYAN (228641)

s/ Azra Z. Mehdi

AZRA Z. MEHDI

100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

MILLER FAUCHER AND CAFFERTY LLP
MARVIN A. MILLER
30 North LaSalle Street, Suite 3200
Chicago, IL 60602
Telephone: 312/782-4880
312/782-4485 (fax)

Liaison Counsel

LAW OFFICES OF LAWRENCE G.
SOICHER
LAWRENCE G. SOICHER
110 East 59th Street, 25th Floor
New York, NY 10022
Telephone: 212/883-8000
212/355-6900 (fax)

Attorneys for Plaintiff

T:\CasesSF\Household Intl\MOT00035003.doc