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,

Plaintiff,

- against -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

Lead Case No. 02-C-5893 (Consolidated)

Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

HOUSEHOLD DEFENDANTS' MOTION FOR LEAVE TO FILE *INSTANTER* MEMORANDUM OF LAW IN EXCESS OF TEN PAGES

Defendants Household International, Inc., Household Finance Corp. and former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (the "Household Defendants" or "Defendants"), by and through their attorneys, hereby move this Court for leave to file their reply memorandum of law in further support of Household Defendants' Motion for Sanctions Including a Recommendation of Dismissal for Failure to Respond and to Compel Responses to Defendants' Court Authorized Supplement to Defendants' Second Set of Interrogatories in excess of ten pages, attached hereto. In support thereof, the Household Defendants state as follows: 1. Defendants first requested the information at issue in this motion on February 13, 2006. Since that time, Defendants have served additional request subject to an Order of this Court. Nevertheless, Plaintiffs have repeatedly refused to provide complete and substantive responses.

2. On December 15, 2006 the Court requested that the parties brief this issue and the Court set a briefing schedule.

3. Comprehensively addressing the inadequacy of Plaintiffs' responses, the bad faith refusal of Plaintiffs to participate in discovery, the factual history of these interrogatories and the litany of objections that Plaintiffs have asserted in opposition to Defendants motion requires more than the ten pages. While Defendants have attempted to fairly and completely address the factual and legal issues raised by Plaintiffs' refusal to adequately respond to Defendants' interrogatories with as much brevity as possible, any further reduction would impact the quality and clarity of the presentation made to the Court.

WHEREFORE, for the reasons stated above, Defendants respectfully request that they be granted leave to file a Memorandum of Law of fifteen pages.

Dated: January 3, 2007 Chicago, Illinois

> Respectfully submitted, EIMER STAHL KLEVORN & SOLBERG LLP

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-and-

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