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,	
)	CLASS ACTION
Plaintiff,	
)	Judge Ronald A. Guzman
vs.	Magistrate Judge Nan R. Nolan
)	
HOUSEHOLD INTERNATIONAL, INC., et	
al.,	
,	
Defendants.	
)	
)	

NOTICE OF THE CLASS' MOTION TO COMPEL HOUSEHOLD DEFENDANTS TO PRODUCE MISSING DOCUMENTS, DOCUMENTS IMPROPERLY WITHHELD OR REDACTED AND FOR A FINDING OF WAIVER DUE TO DEFENDANTS' FAILURE TO ASSERT PRIVILEGE OVER WITHHELD OR REDACTED DOCUMENTS THAT ARE NOT ON THEIR PRIVILEGE LOGS

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TO: COUNSEL ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on Thursday, January 11, 2007 at 9:00 a.m., we shall appear

before the Magistrate Judge Nan R. Nolan, or any judge sitting in her stead, in Courtroom 1858 of

the United States District Court for the Northern District of Illinois, Eastern Division, 219 South

Dearborn Street, Chicago, Illinois, and then and there present the Class' Motion to Compel

Household Defendants to Produce Missing Documents, Documents Improperly Withheld or

Redacted and for a Finding of Waiver Due to Defendants' Failure to Assert Privilege over

Withheld or Redacted Documents that Are Not on Their Privilege Logs, a copy of which is herby

served upon you.

DATED: January 8, 2007

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) JASON C. DAVIS (4165197) BING Z. RYAN (228641)

> s/ Bing Z. Ryan BING Z. RYAN

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Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I, BING Z. RYAN an attorney, hereby certify that I caused the following documents:

Notice of the Class' Motion to Compel Household Defendants to Produce Missing Documents, Documents Improperly Withheld or Redacted and For a Finding of Waiver Due to Defendants' Failure to Assert Privilege Over Withheld or Redacted Documents that Are Not on Their Privilege Logs

The Class' Motion to Compel Household Defendants to Produce Missing Documents,
Documents Improperly Withheld or Redacted and For a Finding of Waiver Due to
Defendants' Failure to Assert Privilege Over Withheld or Redacted Documents that Are Not
on Their Privilege Logs

Declaration of Bing Z. Ryan in Support of the Class' Motion to Compel Household
Defendants to Produce Missing Documents, Document Improperly Withheld or Redacted and
for a Finding of Waiver Due to Defendants' Failure to Assert Privilege Over Withheld or
Redacted Documents that Are Not on Their Privilege Logs.

Appendix of Electronic Cases

to be served by electronic mail upon the following this 8th day of January, 2007:

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s/ Bing Z. Ryan BING Z. RYAN

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