## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

FILED

MAY 1 8 2003 /0

| LAWRENCE E. JAFFE PENSION PLAN, on Behalf of Itself and All Others Similarly ) | MICHAEL W. DOBBINS<br>CLERK, U.S. DISTRICT CO            |
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| Situated, ) Plaintiff, )   | Lead Case No. 02-C-5893<br>(Consolidated)                |
| v. ) HOUSEHOLD INTERNATIONAL, INC., et al. )                                   | Judge Ronald A. Guzman<br>Magistrate Judge Nan REMERETED |
| Defendants. )  | MAY 1 5 2003   |

## AGREED MOTION FOR LEAVE TO FILE INSTANTER OVERSIZED MEMORANDUM OF LAW IN SUPPORT OF HOUSEHOLD DEFENDANTS' MOTION TO DISMISS THE CORRECTED AMENDED CONSOLIDATED CLASS ACTION COMPLAINT

Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz, Gary Gilmer, J.A. Vozar, Robert J. Darnall, Gary G. Dillon, John A. Edwardson, Mary Johnston Evans, J. Dudley Fishburn, Cyrus F. Friedheim, Jr., Louis E. Levy, George A. Lorch, John D. Nichols, James B. Pitblado, S. Jay Stewart and Louis W. Sullivan ("defendants"), by and through their attorneys, hereby move this Court pursuant to N.D. Ill. L.R. 7.1 for leave to file an oversized memorandum in support of their Motion to Dismiss plaintiffs' 154-page Corrected Amended Consolidated Class Action Complaint. In support thereof, defendants state as follows:

1. On March 13, 2003, plaintiffs filed a four-count Amended Consolidated Class Action Complaint (the "amended complaint") against defendants that spans 154 pages and includes 398 numbered paragraphs.



- 2. Plaintiffs purport to represent a class of those who purchased or otherwise acquired Household International stock over a five-year period, October 23, 1997 through October 11, 2002 (the "Class Period").
- 3. The amended complaint includes numerous allegations regarding an allegedly fraudulent scheme and wrongful business conduct, as well as over fifty statements made by defendants during the Class Period which plaintiffs allege were false and misleading under the federal securities laws.
- 4. In order to respond fully to the extensive allegations in the amended complaint, defendants need to file an oversized brief. Specifically, defendants believe that they have six separate legal bases on which to seek dismissal of the amended complaint. Fully advising this Court of the facts underlying plaintiffs' voluminous amended complaint, and comprehensively addressing the law supporting each ground for dismissal, will require more than the fifteen pages permitted under Local Rule 7.1.
- 5. Accordingly, defendants respectfully request that this Court allow defendants to file their memorandum of law in excess of fifteen pages. A copy of defendants' Memorandum of Law in Support of the Motion to Dismiss is attached hereto.
  - 6. Plaintiffs have no objection to this request.

WHEREFORE, for the reasons stated above, defendants respectfully request that they be granted leave to file a Memorandum of Law in Support of their Motion to Dismiss of 49 pages.

Respectfully submitted,

Dated: May 13, 2003 EIMER STAHL KLEVORN & SOLBERG

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