FOR THE NORTHER	FATES DISTRICT COURT RN DISTRICT OF ILLINOIS RN DIVISION
LAWRENCE E. JAFFE, Pension Plan and on behalf of all others similarly situated, Plaintiff, V.	No. 02 C 5893
HOUSEHOLD INTERNATIONAL, INC. ARTHUR ANDERSEN, L.L.P,	Judge Ronald A. Guzman
MARC ABRAMS, individually and on behalf of all others similarly situated, Plaintiff, V. HOUSEHOLD INTERNATIONAL, INC., et al., Defendants. EISBERRY HOLDINGS, LTD., on behalf of itself and all others similarly situated,	DOCKETED OZ OCT - 4 PM 4: 42 CLERK OLERK DUSTRICT COURT DOCKETED OCT 1 5 2002
Plaintiff, v. HOUSEHOLD INTERNATIONAL, INC.,))) No. 02 C 6130)
Defendants.) Judge George M. Marovich)))

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

JEFFREY P. JANNETT, on)
behalf of himself and all others)
similarly situated,)
Plaintiff,)
v .) No. 02 C 6326
HOUSEHOLD INTERNATIONAL, INC., et al.,)) Judge Marvin E. Aspen
Defendants.)
BERNARD DOLOWICH, on behalf of himself and all others similarly situated,	
Plaintiff,)
V.) No. 02 C 6352
HOUSEHOLD INTERNATIONAL, INC., et al.,)) Judge Rebecca R. Pallmeyer
Defendants.)
RONALD H. HANSCHMAN on behalf of himself and all others similarly situated,)))
Plaintiff,)
v.) No. 02 C 6859
HOUSEHOLD INTERNATIONAL, INC., et al.,)) Judge Charles R. Norgle
Defendants.)

Case: 1:02-cv-05893 Document #: 9 Filed: 10/04/02 Page 3 of 13 PageID #:45

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

GERALD M. FRIEDEL, on behalf of)
himself and all others similarly situated,)
)
Plaintiff,)
)
V.) No. 02 C 7067
HOUSEHOLD INTERNATIONAL, INC.,	·)
et al.,	
Defendants.) Judge John W. Darrah
)

NOTICE OF MOTION

To: Counsel on the Attached Service List

PLEASE TAKE NOTICE that on Thursday, October 10, 2002 at 9:30 a.m., we shall appear before the Honorable Ronald A. Guzman, or any judge sitting in his stead, in Courtroom 1219 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 *Motion for a Finding of Relatedness*, a copy of which is hereby served upon you.

Dated: October 4, 2002

Respectfully submitted,

Plaintiffs

By:

Marvin A. Miller

Jennifer Winter Sprengel

Lori A. Fanning

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Attorneys for Plaintiffs Abrams, Hanschman and Friedel

Case: 1:02-cv-05893 Document #: 9 Filed: 10/04/02 Page 4 of 13 PageID #:46

CERTIFICATE OF SERVICE

I, Lori A. Fanning, one of the attorneys for plaintiffs Abrams, Hanschman and Friedel, hereby certify that I caused the *Notice of Motion and Motion for a Finding of Relatedness* to be served on all counsel on the attached service list by placing a copy of the same in the United States Mail at 30 North LaSalle Street, Chicago, Illinois this 4th day of October, 2002.

Lori A. Fanning

Case: 1:02-cv-05893 Document #: 9 Filed: 10/04/02 Page 5 of 13 PageID #:47

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OFJLLINOIS **EASTERN DIVISION** LAWRENCE E. JAFFE, Pension Plan and on behalf of all others Plaintiff, No. 02 C 5893 V. HOUSEHOLD INTERNATIONAL, INC. Judge Ronald A. Guzman ARTHUR ANDERSEN, L.L.P, OCT 1 5 2002 Defendants. MARC ABRAMS, individually and on behalf of all others similarly situated,

V. HOUSEHOLD INTERNATIONAL, INC., et al.,

similarly situated,

Defendants.

Plaintiff,

EISBERRY HOLDINGS, LTD., on behalf of itself and all others similarly situated,

Plaintiff,

V.

HOUSEHOLD INTERNATIONAL, INC., et al.,

Defendants.

No. 02 C 5934

Judge Joan H. Lefkow

No. 02 C 6130

Judge George M. Marovich

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

JEFFREY P. JANNETT, on behalf of himself and all others similarly situated,)))
Plaintiff,	}
v.) No. 02 C 6326
HOUSEHOLD INTERNATIONAL, INC., et al.,)) Judge Marvin E. Aspen
Defendants.	
BERNARD DOLOWICH, on behalf of himself and all others similarly situated,	
Plaintiff,	
. v .	No. 02 C 6352
HOUSEHOLD INTERNATIONAL, INC., et al.,)) Judge Rebecca R. Pallmeyer
Defendants.	
RONALD H. HANSCHMAN on behalf of himself and all others similarly situated,)))
Plaintiff,	
v .) No. 02 C 6859
HOUSEHOLD INTERNATIONAL, INC., et al., Defendants.)) Judge Charles R. Norgle)

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

No. 02 C 7067
Indee John W. Dawel
Judge John W. Darrah

MOTION FOR A FINDING OF RELATEDNESS

Plaintiffs, in several of the above-captioned securities class actions, by their counsel, request this Court to make a finding pursuant to Local Rule 40.4, that the following actions are related to *Jaffe v. Household International, Inc.*, et al., 02 C 5893, which has been assigned to this Court, and in support, state:

- 1. On August 19, 2002, Plaintiff in the Jaffe v. Household International, Inc., et al., 02 C 5893 litigation commenced his class action complaint against defendants, attached hereto as Exhibit A.
- 2. On August 20, 2002, Plaintiff in the Abrams v. Household International, Inc., et al. litigation commenced his class action complaint against defendants, attached hereto as Exhibit B.
- 3. On August 28, 2002, Plaintiff in the Eisberry Holdings, Ltd. v. Household International, Inc., et al. litigation commenced its class action complaint against defendants, attached hereto as Exhibit C.

- 4. On September 5, 2002, Plaintiff in the Jannett v. Household International, Inc., et al. litigation commenced his class action complaint against defendants, attached hereto as Exhibit D.
- 5. On September 6, 2002, Plaintiff in the Dolowich v. Household International, Inc., et al. litigation commenced his class action complaint against defendants, attached hereto as Exhibit E.
- 6. On September 25, 2002, Plaintiff in the Hanschman v. Household International, Inc., et al. litigation commenced his class action complaint against defendants, attached hereto as Exhibit F.
- 7. On October 2, 2002, Plaintiff in the Friedel v. Household International, Inc., et al. litigation commenced his class action complaint against defendants, attached hereto as Exhibit G.
- 8. All actions arise from the same alleged improper conduct of the defendants and seek similar relief. Therefore, the handling and management of the actions by the same judge is likely to result in a substantial saving of judicial time and effort. The *Jaffe* action has not progressed to the point where designating these cases as related would likely delay the proceedings in the earlier filed action.
- 9. All classes asserted in the annexed complaints are substantially the same. If this court enters a finding that all subsequently filed actions are related, plaintiffs contemplate filing a consolidated class action complaint which will eliminate any minimal differences among them.
- This motion is brought before the filing of any answer or motion in any action because plaintiff believes that it is in the best interests of the parties and the Court to quickly relate these cases.
 - 11. In all actions, plaintiffs have requested a jury.

- 12. It is believed that judicial economy will be promoted by relating these actions so that there will be a consolidated complaint and avoidance of duplication of motion practice and/or discovery.
- 13. Counsel are attempting to determine if other actions exist and will advise the Court upon obtaining such knowledge.
- 14. Plaintiffs' counsel reasonably believes that it would be prudent for defendants not to have to respond to the extant complaints until after a lead plaintiff and lead counsel are appointed by the Court pursuant to the Private Securities Litigation Reform Act ("PSLRA") and thirty (30) days after the filing of a consolidated amended complaint.
- 15. Nothing in this motion shall prejudice defendants' rights to oppose certification of a class.

WHEREFORE, Plaintiff respectfully requests this Court to make a finding of relatedness pursuant to Local Rule 40.4 and to extend the time for defendants to answer or move as to all the related complaints until 30 days after the filing of a Consolidated Amended Complaint and to stay discovery, including Rule 26 disclosures, until after a ruling on any motion to dismiss.

Dated: October 4, 2002

Respectfully submitted,

Plaintiff's

By:

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SEE CASE FILE COR EXHIBITS