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)

CLASS ACTION

Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

HOUSEHOLD DEFENDANTS' MOTION TO COMPEL **RESPONSES TO DEFENDANTS' FIFTH SET OF INTERROGATORIES**

Defendants Household International, Inc. and Household Finance Corp. and its former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar ("Defendants") hereby move pursuant to Fed. R. Civ. P. 37(a)(2)(B) for the Court to compel responses to Household Defendants' Fifth Set of Interrogatories to Lead Plaintiffs for the reasons stated in the accompanying Memorandum of Law.

-2-

Dated: February 21, 2007

Chicago, Illinois

EIMER STAHL KLEVORN & SOLBERG LLP

By: <u>s/Adam B. Deutsch</u> Nathan P. Eimer Adam B. Deutsch 224 South Michigan Avenue Suite 1100 Chicago, Illinois 60604 (312) 660-7600

-and-

CAHILL GORDON & REINDEL LLP Thomas J. Kavaler Howard G. Sloane Landis C. Best Patricia Farren David R. Owen 80 Pine Street New York, NY 10005 (212) 701-3000

Attorneys for Defendants Household International, Inc, Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J. A. Vozar Case: 1:02-cv-05893 Document #: 968 Filed: 02/21/07 Page 3 of 3 PageID #:21295

CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on February 21, 2007, he caused to be served copies of **Household Defendants' Motion To Compel Responses To Defendants' Fifth Set Of Interrogatories** to the parties listed below via the manner stated.

/s/ Adam B. Deutsch

Via E-mail and Fed-Ex

Marvin A. Miller Lori A. Fanning MILLER LAW LLC 101 North Wacker Drive, Suite 2010 Chicago, IL 60606 (312) 525-8320

Via E-mail and Fed-Ex

Patrick J. Coughlin Azra Z. Mehdi Cameron Baker Luke O. Brooks LERACH COUGHLIN STOIA & ROBBINS LLP 100 Pine Street, Suite 2600 San Francisco, California 94111 (415) 288-4545 (415) 288-4534 (fax)