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,

Plaintiff,

- against
HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

HOUSEHOLD DEFENDANTS' MOTION FOR PARTIAL RECONSIDERATION AND CLARIFICATION OF THE COURT'S APRIL 27, 2007 ORDER

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 (collectively, "Defendants") hereby move this Court (i) to reconsider its April 27, 2007 Order insofar as it directed Defendants to produce and/or log all documents in Defendants' files regarding the privileged Compliance Engagement performed by Ernst & Young ("E&Y") during the period July 2002 through early 2004 and (ii) to clarify that its April 27, 2007 Order did not intend to overrule its prior directives with respect to the one seven-hour day duration of the depositions of Messrs. Keller and Bianucci of Ernst & Young. In support of this motion, Defendants submit the accompanying Memorandum of Law in Support of the Household Defendants' Motion for Partial Reconsideration and Clarification of the Court's April 27, 2007 Order, and the Declaration of Landis C. Best in further support thereof.

Case: 1:02-cv-05893 Document #: 1071 Filed: 05/09/07 Page 2 of 2 PageID #:23131

-2-

In light of the Court's stated intention to resolve E&Y issues by May 31, Defendants are amenable to a telephonic presentment on Friday, May 11; Monday, May 14; or at such other time as the Court and the parties are available. Otherwise, pursuant to the Court's rules, Defendants shall appear before the Honorable Nan R. Nolan on Tuesday, May 15, 2007, at 9:00 a.m., or as soon thereafter as Defendants may be heard, and then and there present Defendants' Motion for Partial Reconsideration and Clarification of the Court's April 27, 2007 Order.

Dated: May 9, 2007

Chicago, Illinois

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