

**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,)
)
	v.)
HOUSEHOLD INTERNATIONAL, INC., et al.)
)
	Defendants.)
_____)

Lead Case No. 02-C-5893
(Consolidated)

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

DOCKETED

JUL 28 2003

NOTICE OF AGREED MOTION

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE THAT, on Thursday, July 24, 2003 at 9:30 a.m., or as soon thereafter as counsel may be heard, counsel for the Household Defendants will appear before the Honorable Ronald A. Guzman in the courtroom usually occupied by him, Room 1219 of the Dirksen Federal Building, and present the attached Agreed Motion for Leave to File Instantly an Oversized Reply Memorandum of Law in Support of Household Defendants' Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint.

FILED

JUL 21 2003

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

114

Dated: July 21, 2003

EIMER STAHL KLEVORN & SOLBERG

By: Adam M. Deutsch

Nathan P. Eimer
Adam B. Deutsch
224 South Michigan Avenue
11th Floor – Santa Fe Building
Chicago, Illinois 60604
Tel: (312) 660-7600

WACHTELL, LIPTON, ROSEN & KATZ

Paul Vizcarrondo, Jr.
Warren R. Stern
51 West 52nd Street
New York, New York 10019
Tel: (212) 403-1000

*Attorneys for Defendants Household
International, Inc., William F. Aldinger, David
A. Schoenholz, Gary Gilmer, and J.A. Vozar*

WINSTON & STRAWN

By: Norman K. Beck

Robert Y. Sperling
Ronald S. Betman
Dane A. Drobny
Norman K. Beck
35 West Wacker Drive
Chicago, Illinois 60601
Tel: (312) 558-5600

*Attorneys for 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*

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

FILED

JUL 21 2003

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

LAWRENCE E. JAFFE PENSION PLAN,
on Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

HOUSEHOLD INTERNATIONAL, INC., et al.

Defendants.

Lead Case No. 02-C-5893
(Consolidated)

Judge Ronald A. Guzman
Magistrate Judge Nan R. Johnson

DOCKETED

JUL 22 2003

**AGREED MOTION FOR LEAVE TO FILE INSTANTER OVERSIZED REPLY
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 reply 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.

114

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. On May 13, 2003, defendants filed a motion to dismiss the amended complaint and memorandum of law in support thereof. On June 19, 2003, plaintiffs filed a 55 page memorandum in response thereto.

5. In order to respond fully to the allegations and arguments in plaintiffs' response brief, defendants will require more than the 15 pages permitted under Local Rule 7.1.

6. Accordingly, defendants respectfully request that this Court allow defendants to file their reply memorandum of law in excess of fifteen pages. A copy of the Reply Memorandum of Law in Support of Household Defendants' Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint is attached hereto.

7. Plaintiffs have no objection to this request.

WHEREFORE, for the reasons stated above, defendants respectfully request that they be granted leave to file a Reply Memorandum of Law in Support of their Motion to Dismiss of 35 pages.

Respectfully submitted,

Dated: July 21, 2003

EIMER STAHL KLEVORN & SOLBERG

By: 

Nathan P. Eimer
Adam B. Deutsch
224 South Michigan Avenue
11th Floor – Santa Fe Building
Chicago, Illinois 60604
Tel: (312) 660-7600

WACHTELL, LIPTON, ROSEN & KATZ

Paul Vizcarrondo, Jr.
Warren R. Stern
51 West 52nd Street
New York, New York 10019
Tel: (212) 403-1000

*Attorneys for Defendants Household
International, Inc., William F. Aldinger, David
A. Schoenholz, Gary Gilmer, and J.A. Vozar*

WINSTON & STRAWN

By: 

Robert Y. Sperling
Ronald S. Betman
Dane A. Drobny
Norman K. Beck
35 West Wacker Drive
Chicago, Illinois 60601
Tel: (312) 558-5600

*Attorneys for 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*