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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,

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

Plaintiff,

CLASS ACTION

- against -

Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

HOUSEHOLD DEFENDANTS' MOTION PURSUANT TO THE COURT'S OCTOBER 17, 2007 ORDER AND FOR PRECLUSION

For the reasons stated in the accompanying Memorandum, as well as in the affidavit provided by one of Defendants' experts annexed at Exhibit B thereto, 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 the Court pursuant to the Court's October 17, 2007 Order and for preclusion.

November 14, 2007 New York, New York

Respectfully submitted,

By: /s/ David R. Owen

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