

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**THE CLASS' STATEMENT FOR APRIL 29, 2008 TELEPHONIC
STATUS CONFERENCE**

As discussed at the April 22, 2008 status conference, the only outstanding issue before this Court concerns the parties' proposed *Sunstar* stipulation. On Friday, the parties met and conferred telephonically, with the principal issue concerning defendants' proposed expansion of the stipulation to address post-Class Period opinions. During the meet and confer, the parties discussed a possible compromise between the April 17, 2008 draft, which limited the stipulation to testimony concerning events occurring pre-Class Period and during the Class Period, and defendants' April 24, 2008 draft, which had no date limitation. The proposed compromise extends the stipulation to events up to March 28, 2003, the date that the merger between HSBC and Household was consummated. During the meet and confer, defendants suggested that plaintiffs might present evidence of later events without defendants being able to respond adequately. To address this concern, the compromise now includes language that would extend the stipulation to testimony concerning events after March 28, 2003 to the extent the other party introduced evidence about such events, *i.e.* the extent to which the other party opened the door. This language at the same time addresses plaintiffs' concerns that defendants will utilize the stipulation to introduce post-Class Period opinion testimony, which would prejudice plaintiffs. Via email on Monday, April 28, 2008, defendants rejected the proposed compromise language.

At this juncture, this Court should close the referral. There are no additional issues respecting fact or expert discovery for this Court's decision. Adjudication of the ramifications of defendants' refusal to stipulate is properly an issue to be addressed by Judge Guzman in the context of determining admissible evidence.

DATED: April 28, 2008

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/s/ Azra Z. Mehdi
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DECLARATION OF SERVICE BY ELECTRONIC MAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on April 28, 2008, declarant served by electronic mail and by U.S. Mail to the parties **THE CLASS' STATEMENT FOR APRIL 29, 2008 TELEPHONIC STATUS CONFERENCE:** . The parties' email addresses are as follows:

TKavaler@cahill.com PSloane@cahill.com PFarren@cahill.com LBest@cahill.com DOwen@cahill.com	NEimer@EimerStahl.com ADeutsch@EimerStahl.com MMiller@MillerLawLLC.com LFanning@MillerLawLLC.com
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and by U.S. Mail to:

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David R. Scott, Esq.
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I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of April, 2008, at San Francisco, California.

/s/ Marcy Medeiros
MARCY MEDEIROS