

**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. )	
_____ )	

**LEAD PLAINTIFFS' REQUEST FOR STATUS CONFERENCE ON JUNE 30, 2008 TO  
SET TRIAL DATE AND REMAINING PRE-TRIAL SCHEDULE**

Lead plaintiffs request that this Court schedule a status conference for June 30, 2008 to set a trial date and the remaining pretrial schedule. As this Court noted at the March 27, 2008 status conference, “[t]his case is ready for trial.” March 27, 2008 Hrg. Tr. at 19:17. In their last status conference statement, lead plaintiffs proposed a trial date of October 17, 2008, which the Court indicated was feasible at that hearing. *Id.* at 21:17. Lead plaintiffs continue to believe that date makes sense given the fact that this case is nearly six years old and all fact and expert discovery has been completed. Setting a trial date is particularly appropriate now as defendants’ motion for summary judgment will be fully briefed by June 26, 2008, and the parties’ settlement discussions remain at an impasse. The pendency of defendants’ summary judgment should not deter the setting of a trial date because, as this Court acknowledged, the case can proceed to trial while that summary judgment motion is pending. *Id.* at 12:7-13 (not guaranteeing a ruling on the motion prior to trial).

Lead plaintiffs propose the following pretrial schedule, which presents slight revisions to their March 27, 2008 proposed schedule:

Deadline for parties to meet to exchange information and statements pursuant to ¶6(a) and (b) of the Standing Order Establishing Pretrial Procedure (“Standing Order”)	August 29, 2008
Parties to submit draft pretrial order pursuant to ¶6(c) of the Standing Order	September 26, 2008
Parties to submit any motions pursuant to ¶6(e)	September 26, 2008
Parties to file oppositions, if any, to motions filed under ¶6(e) and objections, if any, to the opposing party’s separate jury instructions	October 3, 2008
Final Pretrial Conference	October 10, 2008
Trial	October 17, 2008

DATED: June 24, 2008

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*/s/ Azra Z. Mehdi*

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Attorneys for Plaintiff

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 June 24, 2008, declarant served by electronic mail and by U.S. Mail to the parties the: **LEAD PLAINTIFFS' REQUEST FOR STATUS CONFERENCE ON JUNE 30, 2008 TO SET TRIAL DATE AND REMAINING PRE-TRIAL SCHEDULE.** The parties' email addresses are as follows:

<a href="mailto:TKavaler@cahill.com">TKavaler@cahill.com</a> <a href="mailto:PSloane@cahill.com">PSloane@cahill.com</a> <a href="mailto:PFarren@cahill.com">PFarren@cahill.com</a> <a href="mailto:LBest@cahill.com">LBest@cahill.com</a> <a href="mailto:DOwen@cahill.com">DOwen@cahill.com</a>	<a href="mailto:NEimer@EimerStahl.com">NEimer@EimerStahl.com</a> <a href="mailto:ADeutsch@EimerStahl.com">ADeutsch@EimerStahl.com</a> <a href="mailto:MMiller@MillerLawLLC.com">MMiller@MillerLawLLC.com</a> <a href="mailto:LFanning@MillerLawLLC.com">LFanning@MillerLawLLC.com</a>
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and by U.S. Mail to:

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David R. Scott, Esq.  
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Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of June, 2008, at San Francisco, California.

/s/ Deborah R. Dash  
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DEBORAH R. DASH