



accompanied their brief with a “motion to file documents under seal” which in reality seeks the Court’s permission to file just three of the confidential exhibits under seal and all others “in the open.”

The Court has wisely anticipated the likelihood of Plaintiffs’ diverting attention from important pre-trial matters with the filing of constant motions to unseal, and stated, “[W]hat makes the most sense to me is file a complete motion in limine along with the [confidential] documents . . . under seal and then file an amended version for the public docket. . . . And at some point during the process *after we have ruled on the issues*, we will, of course, have to rule on what extent, if any, these documents continue to be confidential during the course of the trial. . . .” See Transcript of Proceeding Before the Hon. Ronald A. Guzman at 13-14, *Jaffe v. Household Int’l, Inc.*, No. 02 Civ. 5893 (June 30, 2008). Defendants agree and ask that the Court deny Plaintiffs’ motion to the extent it seeks to remove the Confidential designation from any documents at this time.

Dated: January 19, 2009  
New York, New York

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

By: /s/ Thomas J. Kavalier

Thomas J. Kavalier

Peter Sloane

Patricia Farren

Susan Buckley

Landis C. Best

David R. Owen

80 Pine Street

New York, New York 10005

(212) 701-3000

-and-

EIMER STAHL KLEVORN & SOLBERG  
LLP

224 South Michigan Ave.

Suite 1100

Chicago, Illinois 60604

(312) 660-7600

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