

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

_____ LAWRENCE E. JAFFE PENSION PLAN, ON) BEHALF OF ITSELF AND ALL OTHERS SIMILARLY) SITUATED,) Plaintiff,) - against -) HOUSEHOLD INTERNATIONAL, INC., ET AL.,) Defendants.) _____)	Lead Case No. 02-C5893 (Consolidated) CLASS ACTION Judge Ronald A. Guzman
---	--

**HOUSEHOLD DEFENDANTS’ MOTION TO FILE DOCUMENTS UNDER SEAL IN
CONNECTION WITH ITS MEMORANDUM OF LAW IN OPPOSITION TO
PLAINTIFFS’ “SPOILIATION” MOTION**

This memorandum is respectfully submitted on behalf of Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz, and Gary Gilmer (collectively, the “Defendants”), (collectively, “Household” or “Defendants”), respectfully move, pursuant to Local Rule 26.2, that their Memorandum of Law in Opposition to Plaintiffs’ “Spoliation” Motion and the accompanying affidavits and declarations be filed under seal, in whole or in part.¹

Portions of and exhibits to these documents contain “Confidential Material” as defined in the Protective Order entered in this case (“Protective Order”), *Jaffe v. Household Int’l, Inc.*, No. 02 Civ. 5893 (Order of Nov. 5, 2004). Paragraph 22 of the Protective Order requires

¹ Non-Class Defendants Joseph A. Vozar and Household Finance Corporation (“HFC”) join in this motion.

that such documents be filed under seal with the Clerk of the Court. Defendants have filed a redacted version of their papers in the public file consistent with Paragraph 22 of the Protective Order.

WHEREFORE, Defendants respectfully request that the Court grant their Motion to File Documents Under Seal in Connection with its Memorandum of Law in Opposition to Plaintiffs' "Spoliation" Motion.

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*