

CERTIFICATE OF SERVICE

I, Marvin A. Miller, one of plaintiff's attorneys, hereby certify that I caused the *Plaintiffs' Response to the Household Defendants' Motion for Leave to Cite Recent Authority in Support of the Household Defendants' Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint* to be served on all counsel on the attached service list by facsimile transmission this 17th day of December, 2003.


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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)
Situating,)

Plaintiff,)

vs.)

HOUSEHOLD INTERNATIONAL, INC., et)
al.,)

Defendants.)

FILED

DEC 17 2003

No. 02-C-5893
(Consolidated)

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**PLAINTIFFS' RESPONSE TO THE HOUSEHOLD DEFENDANTS'
MOTION FOR LEAVE TO CITE RECENT AUTHORITY IN SUPPORT
OF THE HOUSEHOLD DEFENDANTS' MOTION TO DISMISS
THE CORRECTED AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Plaintiffs respectfully submit this response to the Household Defendants' Motion for Leave to Cite Recent Authority in Support of the Household Defendants' Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint.

1. Plaintiffs do not object to the Household Defendants notifying the Court of the recent decision in *In re WorldCom, Inc. Sec. Litig.*, No. 02 Civ. 3288 (DLC), 03 Civ. 6592, 2003 WL 22738546 (S.D.N.Y. Nov. 21, 2003) in support of their motion to dismiss, and submitting such decision to the Court.

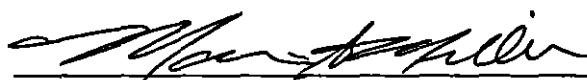
2. Plaintiffs object to the Household Defendants' submission of additional arguments, which are almost five pages long, in support of their motion. Briefing on defendants' motion was completed on July 21, 2003. Almost five months after the completion of the briefing on the motion

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to dismiss, the Household Defendants belatedly seek to supplement previously made arguments, thereby attempting to get multiple bites of the apple.

3. Accordingly, plaintiffs respectfully request that this Court disregard the Household Defendants' arguments on pages 2-5 of Defendants' Motion for Leave to Cite Recent Authority in Support of the Household Defendants' Motion to Dismiss the Corrected Amended Consolidated Class Action Complaint.

DATED: December 17, 2003



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