

**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 )  
SITUATED, )

Plaintiff, )

- against - )

HOUSEHOLD INTERNATIONAL, INC., ET AL., )

Defendants. )  
\_\_\_\_\_ )

Lead Case No. 02-C5893  
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman

**DEFENDANTS' CROSS-MOTION PURSUANT TO  
FED. R. CIV. P. 37(C) TO EXCLUDE DECLARATIONS OF  
PLAINTIFFS' PREVIOUSLY CONCEALED WITNESSES**

Defendants Household International, Inc. and its former officers and directors William F. Aldinger, David A. Schoenholz, and Gary Gilmer (“Defendants”) hereby move pursuant to Federal Rule of Civil Procedure 37(c) for an Order excluding the declarations of Plaintiffs’ seven previously concealed witnesses and excluding the contents of those declarations from consideration on Plaintiffs’ Motion Requesting Evidentiary Sanctions, for the reasons stated in the accompanying Memorandum of Law and the Declaration of Landis C. Best in support of Defendants’ Cross-Motion Pursuant to Fed. R. Civ. P. 37(c) to Exclude Declarations of Plaintiffs’ Previously Concealed Witnesses, submitted herewith.

Dated: January 19, 2009

New York, New York

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