

**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,)		Lead Case No. 02-C-5893) (Consolidated))
- <i>against</i> -)		<u>CLASS ACTION</u>)
HOUSEHOLD INTERNATIONAL, INC., ET AL.,)		Judge Ronald A. Guzman)
Defendants.)		

**DEFENDANTS' MOTION IN LIMINE PURSUANT TO
LOCAL RULE 16.1 TO EXCLUDE THE ALLEGEDLY FALSE
AND MISLEADING STATEMENTS THAT WERE NOT
IDENTIFIED BY PLAINTIFFS IN DISCOVERY**

Defendants Household International, Inc. ("Household"), William F. Aldinger, David A. Schoenholz and Gary Gilmer (collectively, the "Household Defendants" or "Defendants"), hereby move pursuant to Local Rule 16.1(a) for an Order precluding Plaintiffs from offering into evidence at trial statements that Plaintiffs claim are the false and misleading statements on which they base their fraud claims, but which Plaintiffs did not identify as such during discovery, or at any time since the close of discovery, until January 15, 2009.

In addition, with Plaintiffs' consent, Defendants jointly request that the Court endorse the attached Stipulation and [Proposed] Order Regarding Briefing Schedule, dated January 29, 2009.

Dated: January 30, 2009
New York, New York

CAHILL GORDON & REINDEL LLP

By: /s/ Thomas J. Kavalier
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

-----X	:	
LAWRENCE E. JAFFE PENSION PLAN, ON	:	
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY	:	
SITUATED,	:	Lead Case No. 02-C-5893
	:	(Consolidated)
	:	
Plaintiff,	:	CLASS ACTION
	:	
- against -	:	Judge Ronald A. Guzman
	:	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	:	
	:	
Defendants.	:	
-----X	:	

STIPULATION AND [PROPOSED] ORDER REGARDING
BRIEFING SCHEDULE

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WHEREAS, pursuant to the schedule set by the Court regarding the Pretrial Order, the parties are to file motions *in limine* (including motions to exclude or limit expert testimony under the standards set forth in *Daubert* or otherwise) by January 30, 2009;

WHEREAS, the parties intend to file such motions on January 30, 2009;

WHEREAS, the parties are to appear before this Court for an initial final Pretrial Conference on February 17, 2009 at 10:00am and wish to have the motions fully submitted to the Court at that time:

IT IS HEREBY STIPULATED AND AGREED, by and between the parties to this action, through their undersigned counsel of record, that the following briefing schedule apply to the motions filed on January 30:

1. Responses due on Tuesday, February 10;
2. Replies due on Friday, February 13.

DATED: January 29, 2009

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

By:  _____

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* * * * *

APPROVED AND HEREBY ORDERED THIS ____ day of ____, 2009.

Honorable Ronald A. Guzman,
United States District Judge