

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

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
) <u>CLASS ACTION</u>
Plaintiff,)	
) Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

NOTICE OF PLAINTIFFS' MOTIONS *IN LIMINE*

PLEASE TAKE NOTICE that on Tuesday, February 17, 2009 at 10:00 a.m., we shall appear before the Honorable Ronald A. Guzman in Room 1219 of the Dirksen Federal Building, 219 South Dearborn Street, Chicago, Illinois, and then shall present the following documents copies of which have been served upon you:

- | | |
|-------------------------------|--|
| Motion <i>In Limine</i> No. 1 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> To Preclude Evidence Re: Defendants' Truth on the Market Defense and Defendants' Stock Trading Pursuant to Fed. R. Civ. P. 37 |
| Motion <i>In Limine</i> No. 2 | Memorandum of Law in Support of Plaintiffs' Miscellaneous Motions <i>In Limine</i> |
| Motion <i>In Limine</i> No. 3 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> to Exclude Defendants' Cumulative Expert Testimony |
| Motion <i>In Limine</i> No. 4 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> to Exclude Defense Documents or Testimony Which Refer to Advice From Counsel That Defendants Complied with Federal and State Laws |
| Motion <i>In Limine</i> No. 5 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> to Exclude any Argument that Defendants Fully Disclosed All Litigation Risks to Household's Outside Auditors and to Exclude any Evidence of or Reference to the Adequacy of Household's Class Period Litigation Reserves |
| Motion <i>In Limine</i> No. 6 | Memorandum of Law in Support of Plaintiffs' Motion to Exclude Testimony of Defendants' Proposed Expert Dr. Robert Litan Pursuant to Federal Rule of Evidence 702 |
| Motion <i>In Limine</i> No. 7 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> to Preclude at Trial any Reference to the Unsubstantiated Post-Class Period Allegations of Voter Fraud Against Association of Community Organizations For Reform Now ("A.C.O.R.N.") |
| Motion <i>In Limine</i> No. 8 | Memorandum of Law in Support of Plaintiffs' Motion <i>In Limine</i> to Preclude Defendants from Offering Expert Testimony from any of Their Identified Witnesses Other than Their Three Retained Experts |

Motion *In Limine* No. 9 Memorandum of Law in Support of Plaintiffs' Motion to Exclude Certain Testimony of Defendants' Expert Roman L. Weil Pursuant to Federal Rule of Evidence 702

Motion *In Limine* No. 10 Memorandum of Law in Support of Plaintiffs' Motion to Exclude Certain Testimony of Defendants' Expert John Bley Pursuant to Federal Rule of Evidence 702

DATED: January 30, 2009

Respectfully submitted,

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DECLARATION OF SERVICE BY ELECTRONIC MAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Diego, State of California, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 655 West Broadway Suite 1900, San Diego, California 92101.

2. That on January 30, 2009, declarant served by electronic mail and by U.S. Mail to the parties the **NOTICE OF PLAINTIFFS' MOTIONS IN LIMINE**.

The parties' email addresses are as follows:

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and by U.S. Mail to:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 30th day of January, 2009, at San Diego, California.

/s/ Teresa Holindrake

TERESA HOLINDRAKE