

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

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LAWRENCE E. JAFFE PENSION PLAN, ON )  
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY )  
SITUATED, )

Plaintiffs, )

- against - )

HOUSEHOLD INTERNATIONAL, INC., ET AL., )

Defendants. )

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Lead Case No. 02-C-5893  
(Consolidated)

Judge Ronald A. Guzman

**HOUSEHOLD DEFENDANTS' MOTION FOR  
LEAVE TO FILE *INSTANTER* MEMORANDUM  
OF LAW IN EXCESS OF FIFTEEN PAGES**

Defendants Household International, Inc. (“Household”), William F. Aldinger, David A. Schoenholz and Gary Gilmer (collectively, “Defendants”), by and through their attorneys, hereby move this Court for leave to file their 105- page Memorandum of Law in Support of Defendants’ Omnibus Motion *In Limine* to Exclude or Limit 14 Categories of Evidence, attached hereto as Exhibit A. In support of their application to exceed the 15-page limit, Defendants state as follows:

1. The accompanying Memorandum of Law sets forth arguments in favor precluding from trial approximately 350 documents, drawn form 14 separate categories of documents and based on ten distinct Rules of Federal Civil Procedure or Evidence.

2. Although Defendants could have filed 14 individual memoranda covering each distinct category of documents, due to the overlapping legal issues and in an effort to reduce the burden on the Court, the 14 possible separate briefs were consolidated into the single omnibus Memorandum.
3. No single section of the brief, corresponding to each separate category of excludable documents, surpasses the 15-page limit.
4. Defendants have attempted to address these issues fairly and completely as efficiently as possible, and any further reduction would impact the quality and clarity of the presentation made to the Court.

WHEREFORE, for the reasons stated above, Defendants respectfully request that they be granted leave to file a Memorandum of Law in excess fifteen pages.

Dated: January 30, 2009

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

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