

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

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

Plaintiffs,

- *against* -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

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 IN SUPPORT
OF DEFENDANTS' *DAUBERT* MOTION TO EXCLUDE
THE "EXPERT" TESTIMONY OF CATHERINE A.
GHIGLIERI, CHARLES CROSS AND HARRIS L. DEVOR**

Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, and Gary Gilmer ("Defendants"), by and through their attorneys, hereby move this Court for leave to file their 97-page Consolidated Memorandum of Law in Support of Household Defendants' *Daubert* Motion to Exclude the "Expert" Testimony of Catherine A. Ghiglieri, Charles Cross and Harris L. Devor, attached hereto as Exhibit A. In support of their application to exceed the 15-page limit, Defendants state as follows:

1. The accompanying Consolidated Memorandum of Law identifies fundamental flaws in three expert witness proffered by Plaintiffs, each of which could be the subject of separate motions. The methodological flaws of Plaintiffs' experts are individual as well collective. Because of this interrelated nature, and in order to be more efficient and avoid duplication of legal principals, Defendants have consolidated their motions to exclude Plaintiffs' experts' testimony into this one memorandum of law.
2. 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

By: /s/ Thomas J. Kavalier

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