

**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.)	
_____)	

**LEAD PLAINTIFFS' MOTION FOR LEAVE TO FILE *INSTANTER* BRIEF IN EXCESS
OF 15 PAGES RE LEAD PLAINTIFFS' OPPOSITION TO DEFENDANTS' *DAUBERT*
MOTION TO EXCLUDE THE EXPERT TESTIMONY OF
CATHERINE A. GHIGLIERI**

Lead plaintiffs respectfully request that this Court allow lead plaintiffs to file their Memorandum in Opposition to Defendants' *Daubert* Motion to Exclude the Expert Testimony of Catherine A. Ghiglieri in excess of 15 pages. In support thereof, lead plaintiffs state as follows:

1. The local rules imposed a 15 page limit on briefs. *See* LR 7.1.
2. The subject of lead plaintiffs' opposition is to respond to the legal and factual arguments raised in defendants' 43-page motion.
3. The factual and legal issues raised by defendants' motion are numerous and require detailed analysis. In order to properly address this complex subject and the numerous factual and legal issues relating to these issues, a memorandum in excess of 15 pages but no more than 34 pages is necessary.

WHEREFORE, for the foregoing reasons, lead plaintiffs respectfully requests that the Court grant their leave to file their Memorandum in Opposition to Defendants' *Daubert* Motion to Exclude the Expert Testimony of Catherine A. Ghiglieri in excess of fifteen pages.

DATED: February 10, 2009

Respectfully submitted,

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
AZRA Z. MEHDI (90785467)
D. CAMERON BAKER (154432)
LUKE O. BROOKS (90785469)
JASON C. DAVIS (253370)

/s/ D. Cameron Baker
D. CAMERON BAKER

100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PATRICK J. COUGHLIN (111070)
MICHAEL J. DOWD (135628)
SPENCER A. BURKHOLZ (147029)
DANIEL S. DROSMAN (200643)
MAUREEN E. MUELLER (253431)
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

MILLER LAW LLC
MARVIN A. MILLER
LORI A. FANNING
115 S. LaSalle Street, Suite 2910
Chicago, IL 60603
Telephone: 312/332-3400
312/676-2676 (fax)

Liaison Counsel

LAW OFFICES OF LAWRENCE G.
SOICHER
LAWRENCE G. SOICHER
110 East 59th Street, 25th Floor
New York, NY 10022
Telephone: 212/883-8000
212/355-6900 (fax)

Attorneys for Plaintiff