

**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

**DEFENDANTS' MOTION FOR LEAVE TO FILE
INSTANTER REPLY MEMORANDUM OF LAW IN EXCESS
OF FIFTEEN PAGES IN FURTHER SUPPORT OF
DEFENDANTS' DAUBERT MOTION TO EXCLUDE THE
"EXPERT" TESTIMONY OF CATHERINE A. GHIGLIERI**

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 23-page Reply Memorandum of Law in Further Support of Defendants' *Daubert* Motion to Exclude the "Expert" Testimony Catherine A. Ghiglieri, 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 identifies fundamental flaws in the methodology employed by Plaintiffs' proposed expert, Catherine A. Ghiglieri.

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: February 13, 2009

Respectfully submitted,

CAHILL GORDON & REINDEL LLP

By: /s/ Thomas J. Kavalier

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