

**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,)	
- <i>against</i> -)	Lead Case No. 02-C-5893 (Consolidated)
HOUSEHOLD INTERNATIONAL, INC., ET AL.,) Defendants.)	Judge Ronald A. Guzman

**DEFENDANTS’ MOTION FOR
LEAVE TO FILE *INSTANTER* REPLY MEMORANDUM
OF LAW IN EXCESS OF FIFTEEN PAGES**

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 Reply Memorandum of Law in Further 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 Reply Memorandum of Law sets forth arguments in favor of precluding from trial over 300 documents, drawn from fourteen separate categories of documents, and based on multiple distinct Rules of Federal Civil Procedure or Evidence.

2. Rather than file fourteen individual reply memoranda covering each distinct category of documents, in light of the overlapping legal issues and in an effort to alleviate the burden on the Court, Defendants opted to consolidate the fourteen possible separate reply briefs into the single omnibus Reply Memorandum.
3. No single section of the reply 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 Reply 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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