

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
JUN 18 2004
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

LAWRENCE E. JAFFE PENSION PLAN,
on Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

HOUSEHOLD INTERNATIONAL, INC., et al.

Defendants.

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

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

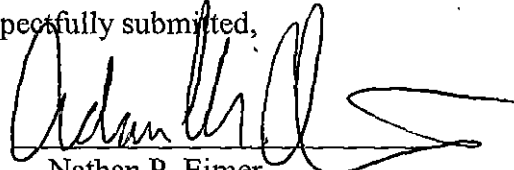
DOCKETED

JUN 24 2004

NOTICE OF MOTION

PLEASE TAKE NOTICE that, on June 22, 2004 at 9:00 a.m., we shall appear before Magistrate Judge Nan R. Nolan in Room 1858 of the Dirksen Federal Building, 219 S. Dearborn, Chicago, Illinois, and shall then and there present Defendants' Motion for Extension of Time to File Their Answers to the Corrected Amended Consolidated Class Action Complaint, a copy of which is attached hereto.

Respectfully submitted,

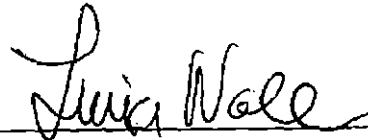
By: 

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*Attorneys for Household International,
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By: _____

A handwritten signature in black ink, appearing to read "Lucia Nale", written over a horizontal line.

Stanley Parzen

Lucia Nale

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Chicago, Illinois 60603

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Attorneys for Arthur Andersen LLP

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**DEFENDANTS' MOTION FOR EXTENSION OF TIME
TO FILE THEIR ANSWERS TO THE CORRECTED
AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

Defendants Household International, Inc., William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar ("Household Defendants"), and defendant Arthur Andersen LLP ("Andersen") (collectively "Defendants") respectfully request that this Court enter an order granting them a 14-day extension to July 2, 2004, to file their Answers to the Corrected Amended Consolidated Class Action Complaint for Violation of the Federal Securities Laws ("Amended Complaint"). In support of this motion, Defendants state the following:

1. Defendants' Answers to the Amended Complaint currently are due on June 18, 2004.
2. This case involves numerous parties, complex issues of fact and law and hundreds of millions of dollars in alleged damages.
3. Plaintiffs' Amended Complaint contains over 390 paragraphs of allegations, many of which are lengthy and/or comprised of numerous sub-parts. Defendants have been working diligently to timely file their Answers but, given the number and breadth of the allegations in the Amended Complaint, Defendants require an additional 14 days to prepare their Answers.

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4. The requested extension will not delay the litigation. Upon entry by this Court of an appropriate protective order, Household Defendants are prepared to produce approximately 2 million pages of documents prior to the filing of the Answers. Defendant Andersen likewise is prepared to commence with the production of certain workpapers, as previously agreed to between plaintiffs and Andersen, upon entry of an appropriate protective order.

5. A protective order is required because certain of the documents plaintiffs seek may be subject to the Gramm-Leach-Bliley Act, 15 U.S.C. § 6801, *et seq.*, or the Fair Credit Report Act, 15 U.S.C. § 1681, *et seq.* (*e.g.*, financial and personal information of Household customers), and/or applicable state privacy provisions and/or are otherwise confidential and proprietary (*e.g.*, audit workpapers, etc.). The parties have been negotiating the terms of a protective order, but have yet to reach an agreement.

6. In an effort to facilitate the progress of the litigation, Defendants explained to plaintiffs that Defendants are prepared to enter into an interim confidentiality stipulation and protective order to be entered by this Court. Such an interim confidentiality stipulation and order would (a) remain in effect until a final confidentiality order is entered, (b) address federal and state privacy statutes and regulations, (c) permit disclosure of discovery material in this litigation to counsel for the parties only, and (d) permit discovery material to be used for the purposes of this litigation only.

7. A copy of Defendants' proposed Interim Stipulation and Order Governing the Confidential Treatment of Discovery Material is attached hereto as Exhibit A.

8. Defendants further explained to plaintiffs that a motion for the entry by this Court of such an interim protective order could be filed on Friday, June 18, 2004, concurrently with this motion, and noticed for presentment on Tuesday, June 22, 2004 concurrently with this motion.

9. Defendants' counsel has conferred with Plaintiffs' counsel about these issues on numerous occasions. When Defendants initially requested the extension, plaintiffs agreed to a 14-day extension of time on the understanding and agreement of all parties that production of documents (as noted in paragraph 8 above) would commence under the terms of an interim protective order. (Copies of correspondence memorializing this agreement are attached hereto as Exhibit B).

10. While Defendants were preparing the interim protective order, plaintiffs changed course, refusing to discuss or agree to the entry of an interim protective order and demanding a letter agreement and immediate production of documents instead. Nonetheless, Defendants presented plaintiffs with the attached interim protective order. Plaintiffs have not responded. Plaintiffs likewise have now reversed their position on the 14-day extension and refuse to agree to Defendants' Motion for Extension of Time to File Their Answers to the Amended Complaint.

WHEREFORE, Defendants respectfully request that this Court grant them a 14-day extension of time, until July 2, 2004, to file their Answers to the Amended Complaint.

Respectfully submitted,

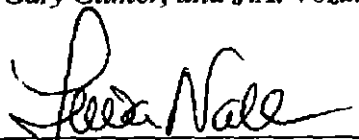
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Attorneys for Arthur Andersen LLP

**See Case File
For
Exhibits**