

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

LAWRENCE E. JAFFE PENSION PLAN,)	
on Behalf of Itself and All Others Similarly)	
Situated,)	Lead Case No. 02-C-5893
)	(Consolidated)
Plaintiff,)	
)	CLASS ACTION
v.)	
)	Judge Ronald A. Guzman
HOUSEHOLD INTERNATIONAL, INC., <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS’ MOTION FOR LEAVE TO FILE AN OVERSIZE BRIEF
IN SUPPORT OF THEIR MOTION FOR RECONSIDERATION OF
THE COURT’S NOVEMBER 22, 2010 ORDER OR, ALTERNATIVELY,
FOR CERTIFICATION FOR INTERLOCUTORY APPEAL, AND
OBJECTION TO ISSUANCE OF NOTICE TO CLASS MEMBERS**

Defendants Household International Inc., William F. Aldinger, David A. Schoenholz, and Gary Gilmer, through their attorneys, respectfully move the Court for leave to file a memorandum of law in excess of fifteen pages in support of their “Motion for Reconsideration of the Court’s November 22, 2010 Order or, Alternatively, For Certification for Interlocutory Appeal, and Objection to Issuance of Notice to Class Members.” In support of this motion, Defendants state as follows:

1. Defendants’ memorandum of law explains in detail why Defendants’ Seventh Amendment right to a jury trial will be abrogated by the Phase II protocol set forth in the November 22 Order and why the Court, therefore, should reconsider the November 22 Order.
2. Defendants’ memorandum of law also proposes a question for certification for interlocutory review pursuant to 28 U.S.C. § 1292(b) if the Court declines to reconsider the

November 22 Order, and explains why the proposed question meets all of the requirements of 28 U.S.C. § 1292(b).

3. In addition, Defendants' memorandum of law explains why the Court should defer consideration, and approval of the issuance, of the Notice of Verdict and Proof of Claim forms proposed by Plaintiffs until after the Court has decided Defendants' motion for reconsideration or certification.

3. In light of the importance of the issues presented in Defendants' motion, Defendants' memorandum of law, which is 23 pages long, is not excessive, and the extra pages are necessary and appropriate to address the significant matters at issue.

4. A copy of Defendants' proposed memorandum of law is attached hereto as Exhibit A for the Court's consideration and for filing upon the Court's granting of this motion.

WHEREFORE, Defendants respectfully request that the Court grant this motion and allow Defendants to file the attached memorandum of law.

Dated: December 20, 2010

Respectfully submitted,

/s/R. Ryan Stoll

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CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on December 20, 2010, he caused true and correct copies of the foregoing Motion for Leave to File and Oversize Brief and the attached memorandum of law to be served via the Court's ECF filing system on the following counsel of record in this action:

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