

**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.)	
_____)	

**PLAINTIFFS' MOTION TO FILE EXHIBIT A TO THE REPORT OF GILARDI & CO.
LLC REGARDING CLAIMS ADMINISTRATION UNDER SEAL PURSUANT TO
LOCAL RULE 26.2**

Plaintiffs move this Court pursuant to Local Rule 26.2 for leave to file Exhibit A to the Report of Gilardi & Co. LLC Regarding Claims Administration (“Gilardi Report”), filed herewith. In support of their request, plaintiffs state:

On November 5, 2004 the Court approved a Protective Order (the “Protective Order”). *See* Dkt. No. 193. The Protective Order requires the parties to prevent disclosure of information designated as Confidential including “the personal financial information of Household’s shareholders.” *See* Protective Order, ¶3. Exhibit A to the Gilardi Report contains confidential financial information of Household’s Shareholders including account numbers and recognized claim amounts.

Accordingly, plaintiffs have filed Exhibit A under seal. Plaintiffs have served a copy of Exhibit A on defendants and a chambers copy has been delivered to Your Honor.

WHEREFORE, plaintiffs request that the Court file Exhibit A to the Gilardi Report under seal.

DATED: December 22, 2011

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL J. DOWD (135628)
SPENCER A. BURKHOLZ (147029)
DANIEL S. DROSMAN (200643)
LAWRENCE A. ABEL (129596)
MAUREEN E. MUELLER (253431)

s/ Michael J. Dowd

MICHAEL J. DOWD

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

ROBBINS GELLER RUDMAN
& DOWD LLP
LUKE O. BROOKS (90785469)
JASON C. DAVIS (253370)
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (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

DECLARATION OF SERVICE BY ELECTRONIC MAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Diego, State of California, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 655 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on December 22, 2011, declarant caused to be served by electronic mail and by U.S. Mail to the parties the following documents:

PLAINTIFFS' MOTION TO FILE EXHIBIT A TO THE REPORT OF GILARDI & CO. LLC REGARDING CLAIMS ADMINISTRATION UNDER SEAL PURSUANT TO LOCAL RULE 26.2

The parties' e-mail addresses are as follows:

TKavaler@cahill.com	Rstoll@skadden.com
PSloane@cahill.com	NEimer@EimerStahl.com
PFarren@cahill.com	Jtheis@eimerstahl.com
LBest@cahill.com	Ldegrand@degrandwolfe.com
DOWen@cahill.com	TWolfe@degrandwolfe.com
JHall@cahill.com	MMiller@MillerLawLLC.com
Mrakoczy@skadden.com	LFanning@MillerLawLLC.com

and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
110 East 59th Street, 25th Floor
New York, NY 10022

I declare under penalty of perjury that the foregoing is true and correct. Executed this 22nd day of December, 2011, at San Diego, California.

s/ Deborah S. Granger
DEBORAH S. GRANGER