

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

FILED
OCT 25 2004
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

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

Plaintiff,

v.

HOUSEHOLD INTERNATIONAL, INC., et al.

Defendants.

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

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

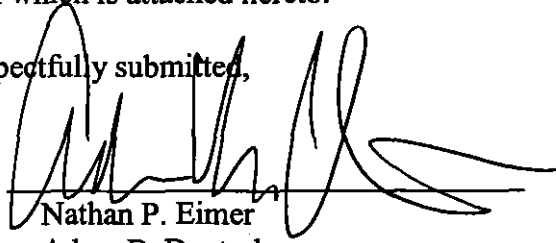
DOCKETED
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NOTICE OF FILING

PLEASE TAKE NOTICE that, on October 25, 2004, we filed with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division, a Joint Motion for Entry of Proposed Protective Order, a copy of which is attached hereto.

Respectfully submitted,

By:



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Aldinger, David A. Schoenholz, Gary
Gilmer, and J.A. Vozar*



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**JOINT MOTION FOR ENTRY
 OF [PROPOSED] PROTECTIVE ORDER**

In its Order dated September 28, 2004 (“Order”), this Court ruled on various issues related to the [Proposed] Protective Order in this matter. Following that Order, the parties have amended the [Proposed] Protective Order to take into consideration the Court’s guidance. Thus, the parties jointly submit the [Proposed] Protective Order for entry (attached hereto as Exhibit A).

The Court’s Order also concluded that certain categories of information designated by Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (the “Household Defendants”), as well as by Arthur Andersen LLP (“Andersen”) (collectively, the “Defendants”) were sufficiently specific to merit confidential treatment but that other categories were too broad as categories of protected information. *Id.* at 3. The Court instructed the Defendants to file an

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appropriate motion narrowly defining the types of documents they seek to protect and analyzing the propriety of secrecy for each additional category of information. *Id.* The [Proposed] Protective Order (§ 3) includes the four categories already approved by this Court, as well as the additional categories proposed by the Household Defendants and Andersen in their individual unopposed motions, submitted in conjunction with this joint motion. The additional categories of documents that Defendants believe should be eligible for confidential treatment, which Plaintiffs do not oppose, are bracketed pending this Court's review.

CONCLUSION

For the foregoing reasons and the authority outlined in the motions submitted by defendants in conjunction with this motion, the parties respectfully request that the [Proposed] Protective Order be entered by the Court.

Submitted by:

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PACE
Industry Union Management Pension Fund and
The International Union of Operating
Engineers
Local No. 132 Pension Plan

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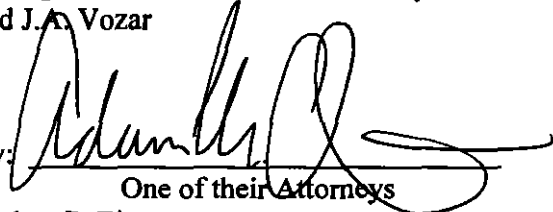
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*See Case File
for
Exhibits*