

**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,)	
)	
Plaintiff,)	02-cv-5893 (Consolidated)
)	
vs.)	Judge Ronald A. Guzman
)	
HOUSEHOLD INTERNATIONAL, INC., et al.,)	
)	
Defendants.)	
)	

**MOTION AND BRIEF FOR PAYMENT OF FEES AND EXPENSES
OF THE SPECIAL MASTER NO. 2**

Now comes Phillip S. Stenger, the Special Master (“Special Master”), by and through his attorneys, Stenger & Stenger, P.C., and hereby submits this Motion and Brief for Payment of Fees and Expenses of the Special Master No. 2 (“Compensation Motion No. 2”), and asks this Court to enter an Order for payment of the fees and expenses of the Special Master as outlined below:

1. On September 21, 2012, this Court issued a Memorandum Opinion and Order (“September 2012 Order”) [Dkt. No. 1822] appointing Phillip S. Stenger of Stenger & Stenger, P.C., as Special Master to identify in accordance with the Order: (i) the claims on which plaintiffs are entitled to judgment as a matter of law and the amount of each such allowed claim; (ii) the claims on which defendants are entitled to judgment as a matter of law; and (iii) the claims that must be resolved at trial.

2. On October 2, 2012, this Court issued a Statement (“October Statement”) [Dkt. No. 1831] clarifying the September 2012 Order, and providing that the Special Master shall undertake any and all proceedings necessary to make one or more report(s) and recommendations(s) (“R&R(s)”) to the Court:

A. Regarding defendants’ objections to certain claims included in the report of the Claims Administrator Gilardi & Co [Dkt. No. 1800], the referral of which to former Magistrate Judge Nolan has been withdrawn;

B. Identifying the claimants who are entitled to judgment as to liability and determining the amount of damages each such claimant should receive;

C. Identifying the claimants whose claims must be resolved at trial (i.e. those who responded “yes” to the claim form question, submitted duplicate claims with conflicting answers to the claim form question or submitted multiple claims with different answers to the claim form question); and

D. Identifying the claimants who forfeited their claims by failing to answer the claim form question and/or supplemental interrogatory.

3. The October Statement further provided that the Special Master would submit to the Court monthly statements of the reasonable fees and expenses incurred to carry out his duties, and that after the Court has reviewed and approved them, the parties will pay in equal shares the reasonable fees and expenses incurred by the Special Master.

4. The Special Master therefore submits the following monthly invoices for review and approval:

- A. Invoice for services from April 1, 2013, through April 30, 2013, for fees in the amount of \$14,801.00 and expenses in the amount of \$17.06, for a total due and owing of \$14,818.06 (Exhibit A);
- B. Invoice for services from May 1, 2013, through May 31, 2013, for fees in the amount of \$29,268.00 and expenses in the amount of \$35.63, for a total due and owing of \$29,303.63 (Exhibit B);
- C. Invoice for services from June 1, 2013, through June 30, 2013, for fees in the amount of \$14,523.00 and expenses in the amount of \$199.26, for a total due and owing of \$14,722.26 (Exhibit C);
- D. Invoice for services from July 1, 2013, through July 31, 2013, for fees in the amount of \$5,469.00 and expenses in the amount of \$49.71, for a total due and owing of \$5,518.71 (Exhibit D);
- E. Invoice for services from August 1, 2013, through August 31, 2013, for fees in the amount of \$4,902.00 and expenses in the amount of \$0.00, for a total due and owing of \$4,902.00 (Exhibit E);
- F. Invoice for services from September 1, 2013, through September 30, 2013, for fees in the amount of \$8,870.00 and expenses in the amount of \$31.16, for a total due and owing of \$8,901.16 (Exhibit F); and
- G. Invoice for services from October 1, 2013, through October 31, 2013, for fees in the amount of \$26,675.00 and expenses in the amount of \$38.89, for a total due and owing of \$26,713.89.

WHEREFORE, the Special Master respectfully requests that this Court enter an Order directing the parties to pay the Special Master the aggregate sum of \$104,508.00 in fees and

\$371.71 in expenses, for a total sum of \$104,879.71 for the period April 1, 2013, through October 31, 2013, to be split-equally between the parties.

Respectfully submitted:

STENGER & STENGER, P.C.

Dated: November 12, 2013

By: /s/ Laura D. Duston

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