

**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)
Situating,)
) CLASS ACTION
Plaintiff,)
) Judge Ronald A. Guzman
vs.)
)
HOUSEHOLD INTERNATIONAL, INC., et)
al.,)
)
Defendants.)
)
)

**PLAINTIFFS' MOTION TO FILE OBJECTION TO THE FORM OF SUPERSEDEAS
BOND AND EXHIBIT B THERETO UNDER SEAL
PURSUANT TO LOCAL RULE 26.2**

Plaintiffs move this Court pursuant to Local Rule 26.2 for leave to file their Objection to the Form of Supersedeas Bond (“Objection”), and the Supersedeas Bond (attached as Exhibit B to the Objection), filed by defendants on November 12, 2013, under seal. 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. *See* Protective Order, ¶3. Defendants have represented that the Supersedeas Bond is not a matter of public record and have requested that it receive confidential treatment. Plaintiffs discuss and quote directly from defendants’ Supersedeas Bond in their Objection. Accordingly, plaintiffs have filed their Objection and Exhibit B thereto under seal. Plaintiffs have served a copy of the above on defendants and a chambers copy has been delivered to the Court.

WHEREFORE, plaintiffs request that the Court file plaintiffs’ Objection and defendants’ Supersedeas Bond under seal.

DATED: November 18, 2013

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s/Luke O. Brooks

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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 Francisco, 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 Post Montgomery Center, One Montgomery Street, Suite 1800, San Francisco, California 94104.

2. That on November 18, 2013, declarant caused to be served by electronic mail and by U.S. Mail to the parties the following document:

PLAINTIFFS' MOTION TO FILE OBJECTION TO THE FORM OF SUPERSEDEAS BOND AND EXHIBIT B THERETO UNDER SEAL PURSUANT TO LOCAL RULE 26.2

The parties' e-mail addresses are as follows:

| | |
|---------------------------|---------------------------|
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and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
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New York, NY 10022

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th day of November, 2013, at San Francisco, California.

s/Marcy Medeiros

MARCY MEDEIROS