

**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.)	
)
HOUSEHOLD INTERNATIONAL, INC., et)	
al.,)	
)
Defendants.)	
_____)	

**JOINT PROPOSED SCHEDULE FOR DISCOVERY AS TO CLAIMANTS WHO
RESPONDED “YES” TO THE QUESTION ON THE PROOF OF CLAIM FORM
(LIST 2 CLAIMANTS)**

The parties have met and conferred regarding the discovery schedule for claimants who answered “yes” to the question set forth in the Proof of Claim form. 133 class members who responded “yes” were identified in List No. 2, which was submitted to the Court by the Special Master on July 11, 2013. Docket No. 1860. The Special Master’s Report and Recommendation was adopted by the Court on October 4, 2013. Docket No. 1886. The parties have identified another 48 class members who responded “yes” during the supplemental notice process, which took place earlier this year. The parties submitted a list of these 48 claimants to the Special Master on November 14, 2013. Therefore, there are now 181 claimants who will be subject to discovery.

The parties jointly propose the following schedule for discovery related to these claimants:

1. February 12, 2014: Deadline for defendants to propound written discovery to the claimants.
2. April 15, 2014: Deadline for claimants to respond to defendants’ written discovery.
3. April 30, 2014: Deadline for parties to meet and confer regarding deposition discovery of claimants.
4. August 29, 2014: Deadline for parties to complete discovery, including depositions.

The parties jointly recommend that the Court set a status conference at the Court’s convenience after the August 29, 2014 discovery cut-off. At that status conference, the parties will address the timing of motions for summary judgment and trial.

We respectfully request that the Court enter the proposed schedule.

DATED: December 9, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 9, 2013.

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