

**United States District Court, Northern District of Illinois**

Name of Assigned Judge or Magistrate Judge	Ronald A. Guzman	Sitting Judge if Other than Assigned Judge	
CASE NUMBER	02 C 5893	DATE	12/3/2004
CASE TITLE	LAWRENCE E. JAFFE PENSION PLAN vs. HOUSEHOLD INTERNATIONAL INC., et al		

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd party plaintiff, and (b) state briefly the nature of the motion being presented.]

**MOTION:**

**DOCKET ENTRY:**

- (1)  Filed motion of [ use listing in "Motion" box above.]
- (2)  Brief in support of motion due \_\_\_\_\_.
- (3)  Answer brief to motion due \_\_\_\_\_. Reply to answer brief due \_\_\_\_\_.
- (4)  Ruling/Hearing on \_\_\_\_\_ set for \_\_\_\_\_ at \_\_\_\_\_.
- (5)  Status hearing[held/continued to] [set for/re-set for] on \_\_\_\_\_ set for \_\_\_\_\_ at \_\_\_\_\_.
- (6)  Pretrial conference[held/continued to] [set for/re-set for] on \_\_\_\_\_ set for \_\_\_\_\_ at \_\_\_\_\_.
- (7)  Trial[set for/re-set for] on \_\_\_\_\_ at \_\_\_\_\_.
- (8)  [Bench/Jury trial] [Hearing] held/continued to \_\_\_\_\_ at \_\_\_\_\_.
- (9)  This case is dismissed [with/without] prejudice and without costs[by/agreement/pursuant to]  
 FRCP4(m)  Local Rule 41.1  FRCP41(a)(1)  FRCP41(a)(2).
- (10)  [Other docket entry] Enter stipulation and order regarding class action certification.
- (11)  [For further detail see order attached to the original minute order.]

<input type="checkbox"/> No notices required, advised in open court. <input type="checkbox"/> No notices required. <input checked="" type="checkbox"/> Notices mailed by judge's staff. <input type="checkbox"/> Notified counsel by telephone. <input type="checkbox"/> Docketing to mail notices. <input type="checkbox"/> Mail AO 450 form. <input type="checkbox"/> Copy to judge/magistrate judge.	CG courtroom deputy's initials	Date/time received in central Clerk's Office	number of notices	Document Number  198
			JAN 14 2005 date docketed	
			<i>[Signature]</i> docketing deputy initials	
			1/13/2005 date mailed notice	
			CG mailing deputy initials	

**FILED**

OCT 08 2004

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MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

**EASTERN DIVISION**

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

Plaintiff, )

vs. )

HOUSEHOLD INTERNATIONAL, INC., et )  
al., )

Defendants. )

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

CLASS ACTION

Judge Ronald A. Guzman  
Magistrate Judge Nan R. Nolan

**DOCKETED**  
JAN 14 2005

**FILED**  
OCT 12 2004

**STIPULATION AND [PROPOSED] ORDER REGARDING CLASS ACTION  
CERTIFICATION**

182

198

WHEREAS, lead plaintiffs and proposed class representatives Glickenhau & Company, PACE Industry Union-Management Pension Fund and the International Union of Operating Engineers Local No. 132 Pension Plan ("plaintiffs") moved for class certification by motion dated June 30, 2004;

WHEREAS, plaintiffs have produced documents for all proposed class representatives and defendants have taken the deposition of one of the proposed class representatives; and

WHEREAS, based upon information made available to defendants and the parties' ongoing discussions;

1. The parties stipulate that all persons who purchased or otherwise acquired the securities of Household International, Inc. (as defined in the [Corrected] Amended Consolidated Class Action Complaint for Violation of the Federal Securities Laws) ("Household") between October 23, 1997 and October 11, 2002 ("Class Period") shall be certified as a class only with respect to claims brought pursuant to §§10 and 20 of the Securities Exchange Act of 1934 and Securities and Exchange Commission Rules promulgated thereunder (the "Class"). Excluded from the Class are defendants herein, members of defendants' immediate families, any person, firm, trust, corporation, officer, director or other individual or entity in which any defendant has a controlling interest or which is related to or affiliated with any defendant, and the legal representatives, agents, affiliates, heirs, successors-in-interest or assigns of any such excluded party.

2. The parties stipulate that no class shall be certified for persons who purchased Household securities issued pursuant to Registration Statements declared effective during the Class Period for claims brought pursuant to §§11 and 15 of the Securities Act of 1933. Plaintiffs and their counsel stipulate that they will not seek to certify a class of §§11 or 15 claimants in this action, or otherwise, at any time (except as provided for herein in paragraph 5).

3. Defendants stipulate that they waive any right to move to decertify the Class as defined above, except that defendants shall retain any rights they currently possess to move no earlier than January 13, 2006, and no later than April 13, 2006 to decertify so much of the class certified hereunder as consists of the claims of those persons who acquired Household securities between October 23, 1997 and August 18, 1999 on the grounds that the Sarbanes-Oxley Act of 2002 does not revive certain claims that otherwise would have been time-barred. Except as set forth herein, all parties retain all arguments they possessed at the time this agreement was reached in connection with any such motion(s).

4. The parties agree that nothing herein precludes the parties from making any and all substantive arguments concerning the claims of the named plaintiffs and/or the Class.

5. The parties stipulate that lead plaintiffs retain the right to move to certify all claims, including claims brought pursuant to the Securities Act of 1933, if any challenge to the agreed-upon Class (as defined above) is made by any person other than defendants, which right shall be triggered upon the filing of any such challenge. In the event lead plaintiffs exercise their right under this paragraph to move to certify all claims, including claims brought pursuant to the Securities Act of 1933, defendants shall have the right to oppose such motion on any grounds and to take any discovery necessary to support such opposition without regard to any limitations set forth or agreement contained in this stipulation, and the right to move to decertify the Class agreed to in paragraph 1 hereof.

6. Defendants agree to take no challenge to this agreement in the event of a change in the organizational structure or status of the plaintiffs' proposed class representatives.

7. The parties agree that this stipulation is for use in this case, and in this case only. It shall not be relied upon for purposes of any other matter.

Lead Plaintiffs Glickenhau & Company,  
PACE Industry Union-Management Pension  
Fund and The International Union of Operating  
Engineers Local No. 132 Pension Plan

By: Azra Mehdi  
One of their Attorneys

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Lead Plaintiffs Glickenhous & Company,  
PACE Industry Union-Management Pension  
Fund and The International Union of Operating  
Engineers Local No. 132 Pension Plan


By: \_\_\_\_\_  
One of their Attorneys

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\* \* \*  
APPROVED AND HEREBY ORDERED THIS 3 day of Dec., 2004.

Ronald A. Guzman  
Honorable ~~Nan R. Nolan~~ Ronald A. Guzman  
United States ~~Magistrate~~ Judge

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