UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS

EASTERN DIVISION

LAWRENCE E. JAFFE PENSION PLAN, On) Behalf of Itself and All Others Similarly) Situated,) Plaintiff,) VS.	Lead Case No. 02-C-5893(Consolidated)
) CLASS ACTION
) Judge Ronald A. Guzman
HOUSEHOLD INTERNATIONAL, INC., et)
al.,))
Defendants.))

PLAINTIFFS' MOTION TO WITHDRAW LEAD PLAINTIFFS' AND LEAD COUNSEL'S FEES AND EXPENSE APPLICATIONS AND TO ADJOURN THE RELATED JUNE 24, 2015 HEARING

Lead Plaintiffs' and Lead Counsel's Motion for An Award of Attorneys' Fees and Expenses ("Fee and Expense Application") is currently set for hearing on June 24, 2015. Lead Plaintiff and Lead Counsel respectfully request that the Court adjourn the hearing for the reasons set forth herein.

In November 2013, defendants appealed from the judgment, which was entered by this Court on October 17, 2013. On May 21, 2015, the Seventh Circuit Court of Appeals issued its opinion remanding the case for a new trial on certain limited issues. Plaintiffs filed a petition for panel rehearing as to one issue in the opinion on June 4, 2015. As of today's date, the Court of Appeals has not rendered a decision with respect to the petition for rehearing. However, even if that petition is granted, the judgment will still be reversed and the case remanded to this Court for further proceedings. Therefore, Lead Counsel believes that the Fee and Expense Application is now moot. Lead Counsel ask to withdraw the motion, subject to re-filing if plaintiffs prevail at the new trial, and ask the Court to adjourn the hearing scheduled for June 24, 2015.

DATED: June 18, 2015

Respectfully submitted,

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> s/ Michael J. Dowd MICHAEL J. DOWD

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Lead Counsel for Plaintiffs

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Liaison Counsel

DECLARATION OF SERVICE

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 Diego, 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 655 W. Broadway, Suite 1900, San Diego, California 92101.

2. That on June 18, 2015, declarant served by electronic mail to the parties listed below the following documents:

<u>PLAINTIFFS' MOTION TO WITHDRAW LEAD PLAINTIFFS' AND LEAD</u> <u>COUNSEL'S FEES AND EXPENSE APPLICATIONS AND TO ADJOURN THE RELATED</u> JUNE 24, 2015 HEARING

The parties' e-mail addresses are as follows:

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Pclement@bancroftpllc.com	Lfanning@MillerLawLLC.com

I declare under penalty of perjury that the foregoing is true and correct. Executed this 18th

day of June, 2015, at San Diego, California.

Deborah S. Granger

DEBORAH S. GRANGER