

**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,))	Case No. 02 C 5893
Plaintiff,))	
)	Judge Jorge L. Alonso
)	
v.))	
)	
HOUSEHOLD INTERNATIONAL, INC.,))	
et al.,))	
)	
Defendants.))	

AGREED MOTION FOR ENTRY OF STIPULATION AND PRETRIAL ORDER

The parties to this action, through their undersigned counsel, respectfully move, on an agreed basis and by stipulation, for entry of an Order setting a schedule for the remaining pretrial proceedings in this case. In support of this motion, the parties state as follows:

1. On September 8, 2015, the Court entered an Order setting the trial in this case for June 6, 2016, and setting certain other deadlines, including a deadline for the completion of expert depositions of January 20, 2016. (Dkt. No. 2042.) No Pretrial Order has yet been entered.
2. On January 7, 2016, the Court entered an Order setting a Pretrial Conference for May 18, 2016, at 11:00 a.m. (Dkt. No. 2089.)
3. On January 8, 2016, the parties agreed, subject to approval by this Court, to extend the expert deposition cutoff date to February 26, 2016. This extension, if granted, will not affect the trial date or any other deadlines set forth in the Court's September 8 Order.
4. In light of these events, the parties have conferred and agreed on a proposed schedule for the remaining pretrial proceedings that will need to be completed in advance of the June 6, 2016 trial date, and have embodied their agreement in a proposed Stipulation and Order

Setting Pretrial Schedule. In accordance with this Court's Case Management Procedures, the parties have emailed their proposed Stipulation and Order to Proposed_Order_Alonso@ilnd.uscourts.gov.

WHEREFORE, the parties respectfully request that the Court enter their proposed Stipulation and Order Setting Pretrial Schedule.

Dated: January 14, 2016

Respectfully submitted,

/s/ Michael J. Dowd

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CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on January 14, 2016, he caused true and correct copies of the foregoing Agreed Motion for Entry of Stipulation and Pretrial Order to be served via the Court's ECF filing system on the following counsel of record in this action:

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