

**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,	)	
	)	
v.	)	Judge Jorge L. Alonso
	)	
HOUSEHOLD INTERNATIONAL, INC., <i>et al.</i> ,	)	
	)	
Defendants.	)	

**INDIVIDUAL DEFENDANTS’ MOTION IN LIMINE TO  
BAR EVIDENCE REGARDING THEIR FINANCIAL CONDITION**

Defendants William F. Aldinger, David A. Schoenholz, and Gary Gilmer (collectively, “Individual Defendants”) hereby move this Court pursuant to Local Rule 16.1(a) for an Order precluding Plaintiffs from introducing evidence, making argument, or eliciting testimony regarding Individual Defendants’ respective financial conditions, including but not limited to their personal wealth, income, compensation, assets, stock options, or benefits. The evidence that should be barred from retrial includes, but is not limited to, the following exhibits:

- A. D0758 (Form 4 for Gary D. Gilmer, dated February 14, 2000 - statement for February 2000);
- B. D0759 (Form 4 for Gary D. Gilmer, dated October 19, 2000 - statement for October 2000);
- C. D0763 (Form 4 for Gary D. Gilmer, dated July 19, 2001 - statement for July 2001);
- D. P0772 (Compensation Committee Meeting Materials for September 10, 2002);
- E. P0773 (Board of Directors Meeting Agenda July 26, 2002 8:30 a.m.);

- F. P0774 (Compensation Committee Meeting Materials for January 28, 2002);
- G. D0774 (Form 4 for William F. Aldinger, dated August 23, 2000 – Statement for August 2000);
- H. D0775 (Form 4 for William F. Aldinger, dated January 19, 2001 – Statement for January 2001);
- I. P0776 (Agenda Item II: Executive Compensation Materials);
- J. D0796 (Form 5 for David A. Schoenholz, dated January 21, 2002 - statement for December 2001);
- K. D0797 (Form 4 for David A. Schoenholz, dated May 15, 2002 - statement for May 2002);
- L. P1038 (E-mail with subject Revised Tier 1&2 Spreadsheets attaching spreadsheet titled Highly Paid U.S. Employees – Tier 1 – Parachute Calculations); and
- M. P1476 (Aldinger SEC Deposition Transcript).

Dated: April 22, 2016

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