

**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.)		

**DEFENDANTS' MOTION IN LIMINE NO. 2
TO PRECLUDE REFERENCE TO PRIOR PROCEEDINGS**

Defendants respectfully move the Court for an Order precluding any references to the prior proceedings in this case, other than as reflected in stipulations or the Court's instructions to the jury, including precluding the following:

- A. Testimony or other evidence from or about Dr. Mukesh Bajaj, Defendants' loss causation expert in the first trial
- B. The first jury's acceptance of the leakage model and the amount of the partial judgment and prejudgment interest awarded after the first trial
- C. Characterizations of the first jury's findings and references to purported misstatements other than the 17 misstatements found by the first jury
- D. The Seventh Circuit's opinion in this case and this Court's ruling on Defendants' *Daubert* motion

In support of this motion, Defendants have submitted herewith an accompanying memorandum of law that explains the bases for excluding each of these categories of evidence.

WHEREFORE, Defendants respectfully request that the Court grant their Motion *In Limine* No. 2 To Preclude Reference to Prior Proceedings.

Dated: April 22, 2016

Respectfully submitted,

/s/ R. Ryan Stoll

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CERTIFICATE OF SERVICE

R. Ryan Stoll, an attorney, hereby certifies that on April 22, 2016, he caused true and correct copies of the foregoing Defendants' Motion *In Limine* No. 2 To Preclude Reference to Prior Proceedings to be served via the Court's ECF filing system on the following counsel of record in this action:

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