

**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) <u>CLASS ACTION</u> Honorable Jorge L. Alonso
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**PLAINTIFFS' REPLY IN FURTHER SUPPORT OF THEIR
MOTION *IN LIMINE* NO. 8**

Plaintiffs' Motion *in Limine* No. 8 to Bar Evidence or Reference to Aggregate Damages is unopposed. Defs' Response at 1 (stating that "Defendants [] have no objection"). Dkt. No. 2167 at 1. Further, defendants have represented that they "do not intend to proffer such evidence or make any references to aggregate damages." *Id.* Thus, plaintiffs' MIL No. 8 should be granted.¹

DATED: May 13, 2016

Respectfully submitted,

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¹ See *United States v. Azteca Supply Co.*, No. 10 CR 80, 2010 WL 4962828, at *5 (N.D. Ill. Dec. 1, 2010) (precluding "[d]efendants from introducing evidence, making argument, or otherwise mentioning the potential penalties" they faced, when "[d]efense counsel represent[ed] that they [had] no intention of making [such] arguments"); *United States v. Sullivan*, No. 10 CR 821, 2011 WL 4808118, at *10 (N.D. Ill. Oct. 11, 2011) (barring "improper arguments," including asking jurors "to put themselves in the position of one of the parties," when the government stated that it had no intention to so argue).

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses for counsel of record denoted on the attached Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 13, 2016.

s/ Luke O. Brooks

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