

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, On)	Lead Case No. 02-C-5893
Behalf of Itself and All Others Similarly)	(Consolidated)
Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	Judge Ronald A. Guzman
vs.)	Magistrate Judge Nan R. Nolan
)	
HOUSEHOLD INTERNATIONAL, INC., <i>et</i>)	
<i>al.</i> ,)	
)	
Defendants.)	

STIPULATION FOR LEAVE TO FILE AN AMENDED ANSWER

WHEREAS, on July 2, 2004, Defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar ("Defendants"), by and through their then counsel of record, Milbank, Tweed, Hadley & McCloy LLP, filed their Answer to the [Corrected] Amended Consolidated Class Action Complaint, asserting twenty-two "affirmative defenses"; and

WHEREAS, on November 10, 2005, Magistrate Judge Nan R. Nolan issued an Order granting Plaintiffs' motion to compel responses to the first set of interrogatories. Judge Nolan's Order directed that "before answering the interrogatories regarding the factual basis for the affirmative defenses, defendants should re-evaluate the asserted defenses and determine which truly constitute affirmative defenses"; and

WHEREAS, current counsel for Defendants have, in accordance with the directive of the Magistrate Judge, reviewed the Answer filed by predecessor counsel and have determined that a number of the "affirmative defenses" asserted therein do not require this designation and, as such, without preju-

dice to any requirement that Plaintiffs prove their claims in this case, wish to amend their Answer to the [Corrected] Amended Consolidated Class Action Complaint to withdraw the "affirmative defenses" numbered 1, 3-6, 8-10 and 14-22;

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the parties in the above-captioned action, that, pursuant to Rule 15 of the Federal Rules of Civil Procedure, Defendants hereby file their First Amended Answer to the [Corrected] Amended Consolidated Class Action Complaint, attached hereto as Exhibit A. The parties agree that the withdrawn affirmative defenses are withdrawn with prejudice to their reassertion as affirmative defenses.

DATED: December 6, 2005

CAHILL GORDON & REINDEL LLP

By: 

Thomas J. Cavalier

Howard G. Sloane
Landis C. Best
David Owen
80 Pine Street
New York, New York 10005
(212) 701-3000 (tel.)
(212) 269-5420 (fax)

EIMER STAHL KLEVORN & SOLBERG LLP


Nathan P. Eimer
Adam B. Deutsch
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
(312) 660-7600 (tel.)
(312) 692-1718 (fax)

*Attorneys for Defendants Household International, Inc.,
Household Finance Corporation, William F. Aldinger,
David A. Schoenholz, Gary Gilmer and J.A. Vozar*

LERACH COUGHLIN STOIA GELLER RUDMAN
& ROBBINS LLP

Patrick J. Coughlin (90785466)

Azra Z. Mehdi (90785467)
D. Cameron Baker (154452)
Monique C. Winkler (90786006)
Sylvia Sum (90785892)
Luke O. Brooks (90785469)



Luke O. Brooks

100 Pine Street, Suite 2600
San Francisco, CA 94111
(415) 288-4545 (tel.)
(415) 288-4534 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
William S. Lerach
655 West Broadway, Suite 1900
San Diego, CA 92101
(619) 231-1058 (tel.)
(619) 231-7423 (fax)

Lead Counsel for Plaintiffs

MILLER FAUCHER AND CAFFERTY LLP
Marvin A. Miller
30 North LaSalle Street, Suite 3200
Chicago, IL 60602
(312) 782-4880 (tel.)
(312) 782-4485 (fax)

Liaison Counsel

LAW OFFICES OF LAWRENCE G.
SOICHER
Lawrence G. Soicher
305 Madison Avenue, 46th Floor
New York, NY 10165
(212) 883-8000 (tel.)
(212) 697-0877 (fax)

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on December 6, 2005, he served copies of the Joint Stipulation for Leave to File an Amended Answer, to the parties listed below via the manner stated.

s/ Adam B. Deutsch
Adam B. Deutsch

Via E-mail and U.S. Mail

Marvin A. Miller
Lori A. Fanning
MILLER FAUCHER and CAFFERTY LLP
30 North LaSalle Street, Suite 3200
Chicago, Illinois 60602
(312) 782-4880
(312) 782-4485 (fax)

Via E-mail and U.S. Mail

Stanley J. Parzen
Susan Charles
MAYER BROWN ROWE & MAW LLP
71 S. Wacker Drive
Chicago, Illinois 60606
(312) 782-0600
(312) 701-7711 (Fax)

Via E-mail and U.S. Mail

Patrick J. Coughlin
Azra Z. Mehdi
Luke O. Brooks
LERACH COUGHLIN STOIA
& ROBBINS LLP
100 Pine Street, Suite 2600
San Francisco, California 94111
(415) 288-4545
(415) 288-4534 (fax)