

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DOCKETED
FEB 19 2003

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


FILED
FEB 07 2003
MICHAEL W. DOBINS
CLERK, U.S. DISTRICT COURT
R.D.

NOTICE OF MOTION

TO: COUNSEL ON THE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that on Thursday ¹⁴14, 2003, at 9:30 a.m., we shall appear before Judge Ronald A. Guzman, or any judge sitting in his stead, in Courtroom 1219 of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois, and then and there present the MOTION FOR A FINDING OF RELATEDNESS, a copy of which is hereby served upon you.

DATED: February 7, 2003



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DECLARATION OF SERVICE BY FACSIMILE AND MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and a resident of the County of San Francisco, over the age of 18 years, and not a party to or interested in the within action; that declarant's business address is 100 Pine Street, 26th Floor, San Francisco, California 94111.

2. That on February 7, 2003, declarant served the NOTICE OF MOTION both by facsimile and by depositing a true copy thereof in a United States mailbox at San Francisco, California in a sealed envelope with postage thereon fully prepaid and addressed to the parties listed on the attached Service List.

3. That there is a regular communication by both facsimile and mail between the place of mailing and the places so addressed.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of February, 2003, at San Francisco, California.


DEBORAH R. DASH

HOUSEHOLD INTERNATIONAL (LEAD)
Service List - 02/06/03
Page 1

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NORTHERN DISTRICT OF ILLINOIS
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LAWRENCE E. JAFFE PENSION PLAN, On)
Behalf of Itself and All Others Similarly)
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Plaintiff,)

vs.)

HOUSEHOLD INTERNATIONAL, INC., et al.,)

Defendants.)

Lead Case No. 02-C-5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

MICHAEL W. DORRANS
CLERK, U.S. DISTRICT COURT

FEB 07 2003

FILED

MOTION FOR A FINDING OF RELATEDNESS

Lead plaintiff in the above-captioned consolidated class action, by their counsel, requests this Court to make a finding, pursuant to Local Rule 40.4, that the case entitled *Williamson v. Aldinger, et al.*, 03 C00331, is related to *Jaffe v. Household International, Inc., et al.*, 02 C5893, and in support states:

1. On December 9, 2002, seven class action complaints against defendants were consolidated under *Jaffe v. Household International, Inc., et al.*, 02 C5893. A copy of the *Jaffe* complaint is attached hereto as Exhibit A.

2. On January 15, 2003, plaintiff Leland Williamson filed his complaint, *Williamson v. Aldinger, et al.*, 03 C00331, on behalf of himself, and derivatively on behalf of Household International, Inc. A copy of the *Williamson* complaint, filed in the Northern District of Illinois, is attached hereto as Exhibit B.

3. There is a substantial overlap of issues and parties. Both actions arise from the same alleged improper conduct by substantially the same defendants, involve the same issues of law or fact and seek similar relief. Specifically, both actions seek damages for injuries caused by the following practices:

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a. Defendants' improper accounting of expenses related to certain credit card co-branding and affinity agreements;

b. Defendants' improper accounting of expenses related to a third-party marketing agreement;

c. Defendants' improper practice of reaging delinquent accounts;

d. Defendants' improper accounting of pension fund income; and

e. Defendants' improper lending practices.

4. Both actions are pending in the Northern District of Illinois.

5. The handling and management of the actions by the same judge is therefore likely to result in a substantial saving of judicial time and effort and will result in consistent rulings on common issues.

6. Plaintiffs' consolidated class action complaint is due March 7, 2003. Thus, the consolidated class action has not progressed to the point where designating these cases as related would likely delay the proceedings in the earlier-filed action.

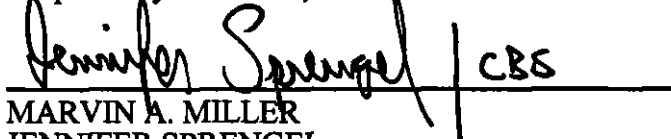
7. This motion is brought before the filing of any answer or motion in either action because plaintiffs believe it is in the best interests of the parties and the Court to promptly relate these cases.

8. In both actions, plaintiffs have requested a jury.

WHEREFORE, plaintiffs respectfully request this Court to make a finding of relatedness pursuant to Local Rule 40.4.

DATED: February 7, 2003

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer Sprengel", is written over a horizontal line. To the right of the signature, the letters "CBS" are written in a similar style.

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Lead Counsel for Plaintiffs

**SEE CASE
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EXHIBITS**