

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

LAWRENCE E. JAFFE PENSION PLAN, ON
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

- against -

HOUSEHOLD INTERNATIONAL, INC., ET AL.,

Defendants.

Lead Case No. 02-C5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**MOTION FOR SANCTIONS AND AN ORDER TO SHOW CAUSE WHY BRIAN
DUFFY SHOULD NOT BE HELD IN CONTEMPT**

Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, "Defendants"), hereby move this court for sanctions against Plaintiffs' counsel under Fed. R. Civ. P. 37(b) and for an order to show cause why Plaintiffs' consultant, Brian Duffy, and his firm, should not be held in contempt and barred from continued access to Household's Confidential Information.. In support of this motion, Defendants submit the accompanying Memorandum of Law and the Affidavit of Donna L. Marks.

Dated: April 6, 2006
Chicago, Illinois

Respectfully submitted,

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