

**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,	}	
	}	Lead Case No. 02-C-5893 (Consolidated)
Plaintiff,	}	<u>CLASS ACTION</u>
- against -	}	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	}	
Defendants.	}	

**HOUSEHOLD DEFENDANTS' MOTION TO COMPEL
RESPONSES TO HOUSEHOLD DEFENDANTS' SECOND SET
OF INTERROGATORIES TO LEAD PLAINTIFFS**

Defendants Household International, Inc. and Household Finance Corp. and its former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar ("Defendants") hereby move pursuant to Fed. R. Civ. P. 37(a)(2)(B) for the Court to compel responses to Household Defendants' Second Set of Interrogatories to Lead Plaintiffs for the reasons stated in the accompanying Memorandum of Law.

-2-

Dated: June 29, 2006

Chicago, Illinois

EIMER STAHL KLEVORN & SOLBERG LLP

By: _____ s/ Adam B. Deutsch
Nathan P. Eimer
Adam B. Deutsch
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
(312) 660-7600

-and-

CAHILL GORDON & REINDEL LLP

Thomas J. Kavalier
Howard G. Sloane
Landis C. Best
Patricia Farren
David R. Owen
80 Pine Street
New York, NY 10005
(212) 701-3000

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

CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on June 29, 2006, he served copies of Household Defendants' Motion to Compel Responses to Household Defendants' Second Set of Interrogatories to Lead Plaintiffs and Affidavit of David R. Owen in Support of Household Defendants' Motion to Compel Responses to Household Defendants' Second Set of Interrogatories to Lead Plaintiffs, to the parties listed below in the manner stated.

s/ Adam B. Deutsch
Adam B. Deutsch

Via E-mail and Federal Express

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

Via Federal Express

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)