

**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., et)	
al.,)	
)
Defendants.)	
_____)	

**MOTION REGARDING THE CLASS' OBJECTION TO MAGISTRATE JUDGE'S
JUNE 15, 2006 ORDER ON POST-CLASS PERIOD DISCOVERY**

1. Pursuant to Fed. R. Civ. P. 72(a), the Class respectfully submits the Class' objection to Magistrate Judge Nolan's June 15, 2006 Order on post-Class Period discovery.

2. On June 15, 2006, Magistrate Judge Nan R. Nolan issued an Order denying Plaintiffs' Motion to Compel Second Set of Interrogatories with respect to post-Class Period information and request for any other post-Class Period discovery. The Class believes this Order is contrary to the law in the Seventh Circuit because it fails to recognize that post-Class Period discovery is necessary in securities fraud cases where intent and materiality are at issue, particularly here where certain significant events relevant to the elements of scienter and materiality occurred outside the Class Period.

3. Additionally, the Magistrate's reliance on the volume of the production in finding burden overlooks critical facts weighing in favor of the necessity of production, including: (1) a third of the voluminous production is unusable spreadsheets and duplicate documents; (2) defendants have not produced discovery responsive to the specific requests at issue here; (3) the magnitude of the fraud and the lengthy Class Period; and (4) the reasonable temporal scope of post-Class Period discovery.

4. For the reasons outlined in the accompanying memorandum in support of this motion, as well as any additional briefing requested by the Court, the Class respectfully requests that the June 15 Order be overruled and the Class obtain the targeted post-Class discovery requested.

DATED: June 29, 2006

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