

**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.)	
_____)	

**THE CLASS' MOTION TO COMPEL RESPONSES TO THIRD SET OF
INTERROGATORIES FROM HOUSEHOLD DEFENDANTS**

1. Lead plaintiffs and the Class respectfully move this Court for an order compelling defendants Household International, Inc., Household Finance Corporation, William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar to supplement their responses to plaintiff's Third Set of Interrogatories, specifically Interrogatory Nos. 22-23, 26, 28-29, 32, 34, 36, 38-42, 44 and 52.

2. The plaintiffs served their Third Set of Interrogatories upon the defendants on March 6, 2006. Plaintiffs did not receive defendants first set of responses to these interrogatories until April 19, 2006. These responses were deficient.

3. During the meet and confer process, defendants promised to deliver amended responses to these interrogatories by June 2, 2006. However, after repeated delays, the defendants did not serve their amended responses upon the Class until June 13, 2006.

4. The amended responses also contained deficient and incomplete responses to the above referenced interrogatories.

5. For the detailed reasons outlined in the Class' memorandum, the Declaration of Luke O. Brooks and any other briefing, this Court should grant the Class' Motion to Compel Household Defendants Responses to the Third Set of Interrogatories.

DATED: June 29, 2006

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