

**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 TO COMPEL HOUSEHOLD DEFENDANTS TO PRODUCE RESPONSIVE
DOCUMENTS TO THE CLASS' THIRD [CORRECTED] REQUEST FOR
PRODUCTION OF DOCUMENTS**

1. Lead plaintiffs and the Class respectfully move this Court for an order compelling defendants to produce responsive documents to Request Nos. 1-2, 6, 9-13, 16, 24, 27, 30 and 35 of the Class' Third [Corrected] Request for Production of Documents ("Third Request").

2. On March 13, 2006, the Class served its Third Request. Defendants responded on April 12, 2006. Defendants' document production in response to the Class' Third Request. Defendants have further refused to produce all documents in response to the specific above-referenced requests. The parties have met and conferred on the Third Request, but cannot reach an agreement.

3. Pursuant to this Court's June 15, 2006 instruction, the Class files this motion. It is undisputed that Household International, Inc. has the documents that the Class seeks. The documents are highly relevant to the Class' case. Production of the documents sought by the Class will not impose an undue burden on Household. The Class respectfully requests this Court grant the Class' motion for the reasons as outlined in the accompanying memorandum and declaration in support of this motion.

DATED: June 29, 2006

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