

**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 FOR ADDITIONAL DEPOSITION TIME PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 30(d)(2)**

Pursuant to Fed. R. Civ. P. 30(d)(2), the Class respectfully moves this Court for an order authorizing an extension of the deposition time for three fact witnesses: Lisa Sodeika, Robin Allcock and Daniel Pantelis, and the four named individual defendants: William Aldinger, David Schoenholz, Gary Gilmer and Joseph Vozar.

Each of these witnesses are key witnesses on the issues involved in this case, which span a nine-year period (1994 through 2002) and address three distinct factual areas: 1) reaging of accounts and manipulation of credit metrics; 2) predatory lending; and 3) improper accounting for multiple third party credit card contracts. As discussed in the Class' accompanying memorandum, these depositions cannot be completed within the presumptive seven hour guideline set forth in Federal Rule of Civil Procedure 30(d)(2). The Household Defendants have been unwilling to extend the time beyond the seven hours.

DATED: June 29, 2006

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