

**UNITED STATES DISTRICT COURT
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)
	}	CLASS ACTION
Plaintiff,	}	Judge Ronald A. Guzman Magistrate Judge Nan R. Nolan
- against -	}	
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	}	
Defendants.	}	
	}	

**HOUSEHOLD DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION TO UNSEAL REPLY**

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This memorandum is respectfully submitted on behalf of Defendants Household International, Inc. (“Household”), Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, “Defendants”) in opposition to The Class’ Motion to Unseal Reply in Support of the Class’ Cross-Motion to Compel Production, filed on July 6, 2006 (the “Motion to Unseal”).

ARGUMENT

Plaintiffs’ submission is not a good faith request for relief on a subject in which they have any bona fide interest, but rather a transparent effort to have the last word on their motion to overrule Defendants’ privilege objections as to Household’s audit letters, individual lawsuit reserves and litigation database.

Instead of making any good faith argument that the Confidential documents they quoted in violation of the Protective Order (in their initial unsealed Reply brief on their motion) were not entitled to that designation (an impossible task, given the nature of the materials), Plaintiffs merely rehash their ineffectual arguments as to why such material is not privileged. For the reasons set forth in Defendants’ prior briefs on this subject, which we will not belabor here, they are mistaken.

Plaintiffs should be admonished to stop harassing Defendants and the Court with unnecessary, bad faith motions (invariably served after defense counsel’s close of business) that serve only to deflect time and attention from the merits. Since they apparently have ample time for such wasteful pursuits Plaintiffs should have no trouble in providing

honest and complete answers to the six interrogatories in Defendants' Third Set of Interrogatories that Plaintiffs represented (in a prior needless motion) they were too busy to address without a three-week extension.

CONCLUSION

For the above reasons, Plaintiffs' Motion to Unseal should be denied in full.

Dated: July 10, 2006
Chicago, Illinois

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CERTIFICATE OF SERVICE

Adam B. Deutsch, an attorney, certifies that on July 10, 2006, he caused to be served copies of Household Defendants' Opposition to Plaintiffs' Motion to Unseal Reply, to the parties listed below via the manner stated.

/s/ Adam B. Deutsch
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