

**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.)	
_____)	

[PROPOSED] ORDER ADOPTING THE CLASS' PROPOSED DISCOVERY PLAN

1. Pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and the local rules of this Court, the Court, having considered the Class' proposed discovery plan, finds that the following schedule should govern the disposition of this case.

Event	Date
Defendants Complete Production of Responsive Documents and Verify the Completion Under Oath	September 15, 2006
Fact Discovery Cut-Off	January 31, 2007
The Class' Initial Expert Disclosures	March 19, 2007
Household Defendants' Expert Disclosures	April 10, 2007
The Class' Rebuttal Expert Disclosures	May 10, 2007
Expert Discovery Cut-Off	June 22, 2007
Mediation	July 20, 2007
Summary Judgment Filing Date	August 20, 2007
Presentment Hearing for Summary Judgment Motions	September 7, 2007
Final Pre-Trial Conference	60 days after rulings on Summary Judgment
Pre-Trial Order Filing Date	45 days after the Final Pre-Trial Conference
Trial Date	TBD

2. **Fact Discovery:** Defendants shall complete document production and verify the completion under oath on September 15, 2006. Defendants shall provide deposition dates for each requested witness no later than one week after the Class has identified with witness. By January 31, 2007, all factual discovery should be completed.

3. **Expert Discovery:** The Class shall complete the initial expert disclosures on March 19, 2007. Defendants shall complete the expert disclosures on April 10, 2007. The Class' rebuttal expert disclosures shall be completed by May 10, 2007. The expert discovery shall be completed by June 22, 2007.

4. **Mediation:** Following the completion of expert discovery, the parties are ordered to enter into mediation. Senior Household management and insurance carriers shall participate in the mediation with authority to settle the case. The mediation shall be completed on July 20, 2007.

5. **Summary Judgment:** Should mediation be unsuccessful, the parties shall complete filing any summary judgment motions on August 20, 2007. The presentment hearing for these motions shall be held on September 7, 2007.

* * *

ORDER

IT IS SO ORDERED.

DATED:

THE HON. MAGISTRATE JUDGE NAN R. NOLAN
UNITED STATES DISTRICT JUDGE

Submitted by:

DATED: August 7, 2006

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PATRICK J. COUGHLIN (90785466)
AZRA Z. MEHDI (90785467)
D. CAMERON BAKER (154452)
MONIQUE C. WINKLER (90786006)
LUKE O. BROOKS (90785469)
MARIA V. MORRIS (223903)
BING Z. RYAN (228641)

s/ Azra Z. Mehdi
AZRA Z. MEHDI

100 Pine Street, Suite 2600
San Francisco, CA 94111
Telephone: 415/288-4545
415/288-4534 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
WILLIAM S. LERACH
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)

Lead Counsel for Plaintiffs

MILLER FAUCHER AND CAFFERTY
LLP
MARVIN A. MILLER
30 North LaSalle Street, Suite 3200
Chicago, IL 60602
Telephone: 312/782-4880
312/782-4485 (fax)

Liaison Counsel

LAW OFFICES OF LAWRENCE G.
SOICHER
LAWRENCE G. SOICHER
110 East 59th Street, 25th Floor
New York, NY 10022
Telephone: 212/883-8000
212/355-6900 (fax)

Attorneys for Plaintiff

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DECLARATION OF SERVICE BY EMAIL AND BY U.S. MAIL

I, the undersigned, declare:

1. That declarant is and was, at all times herein mentioned, a citizen of the United States and employed in the City and County of San Francisco, over the age of 18 years, and not a party to or interested party in the within action; that declarant's business address is 100 Pine Street, Suite 2600, San Francisco, California 94111.

2. That on August 7, 2006, declarant served by electronic mail and by U.S. Mail the **[PROPOSED] ORDER ADOPTING THE CLASS' PROPOSED DISCOVERY PLAN** to the parties listed on the attached Service List. The parties' email addresses are as follows:

TKavaler@cahill.com

PSloane@cahill.com

PFarren@cahill.com

DOwen@cahill.com

NEimer@EimerStahl.com

ADeutsch@EimerStahl.com

mmiller@millerfaucher.com

lfanning@millerfaucher.com

and by U.S. Mail to:

Lawrence G. Soicher, Esq.
Law Offices of Lawrence G. Soicher
110 East 59th Street, 25th Floor
New York, NY 10022

David R. Scott, Esq.
Scott & Scott LLC
108 Norwich Avenue
Colchester, CT 06415

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7th day of August, 2006, at San Francisco, California.

s/ Marcy Medeiros

MARCY MEDEIROS