

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, ON )  
BEHALF OF ITSELF AND ALL OTHERS SIMILARLY )  
SITUATED, )

Plaintiff, )

- against - )

HOUSEHOLD INTERNATIONAL, INC., ET AL., )  
Defendants. )

Lead Case No. 02-C-5893  
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman  
Magistrate Judge Nan R. Nolan

**HOUSEHOLD DEFENDANTS’ MOTION FOR  
AN ORDER ENFORCING THE PROTECTIVE ORDER AND  
FOR APPROPRIATE SANCTIONS**

Defendants Household International, Inc. and Household Finance Corp. and its former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (“Defendants”) hereby move pursuant to Fed. R. Civ. P. 37(b) for the Court to enter an Order (i) requiring Plaintiffs and their counsel to cure their standing violations of the Protective Order by withdrawing from the public record briefs that disclose the subject of Defendants’ Confidential information, (ii) holding Plaintiffs and/or their counsel in contempt for willfully defying the Protective Order, (iii) admonishing Plaintiffs and their counsel against carrying out their threatened further violations of the Protective Order, and (iv) imposing appropriate sanctions on Plaintiffs and their counsel, including payment of the costs and fees Defendants were required to incur in seeking this essential relief. In support of their motion, the Household Defendants submit the accompanying memorandum of law.

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Dated: August 7, 2006

Chicago, Illinois

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