

**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 REGARDING STATE AGENCY DOCUMENTS AND SANCTIONS

Lead plaintiffs and the Class respectfully move this Court for an order that 1) compels Household International, Inc. a) to produce requested information, b) to identify all potential deponents who have had access to any of the state documents, and c) to urge the state agencies to authorize release of the previously produced documents, and that 2) sets a briefing schedule to avoid the disruption that this issue threatens to the newly adopted January 31, 2007 discovery cut-off. The Class also moves for sanctions against Household pursuant to Fed. R. Civ. P. 37(b) by awarding the Class the attorney's fees engendered as a result of this Motion.

In support of its Motion, the Class submits the accompanying Memorandum in Support of Motion Regarding State Agency Documents and Sanctions, the accompanying Declaration of D. Cameron Baker, and the filings in the Court's docket.

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