

**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 TO FILE *INSTANTER* BRIEF IN EXCESS OF TEN PAGES

The Class respectfully request that this Court allow the Class to file its Motion to Compel Further Responses to the Class' Questions for Per Ekholdt Concerning Exhibit 13 and Production of Documents Underlying Wilmer, Cutler & Pickering Report ("Motion") in excess of ten pages. As reasons therefore, the Class states that the Motion was drafted before the Court's October 12, 2006 imposition of a ten-page limit on discovery motions. The subject of the Motion is the improper application privilege over documents and testimony relating to Wilmer Cutler & Pickering's investigation into Household International, Inc.'s restructuring practices during the Class Period.

To properly address the number of procedural, legal and factual issues raised by the Class' Motion, which addresses issues of the application and waiver of the attorney-client privilege and work product protection, a memorandum in excess of ten pages but not more than 13 pages is necessary. Following receipt of the Court's order yesterday afternoon, the Class has worked to shorten the Motion to its current length. Any further reduction would impact the quality and clarity of the presentation made to the Court.

DATED: October 16, 2006

Respectfully submitted,

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