

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,)	
)	CLASS ACTION
Plaintiff,)	
)	Judge Ronald A. Guzman
- against -)	Magistrate Judge Nan R. Nolan
)	
HOUSEHOLD INTERNATIONAL, INC., ET AL.,)	
)	
Defendants.)	

**THE HOUSEHOLD DEFENDANTS' MOTION TO FILE
INSTANTER BRIEF IN EXCESS OF TEN PAGES**

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Defendants Household International, Inc., Household Finance Corp., William F. Aldinger, David A. Schoenholz, Gary Gilmer and J.A. Vozar (collectively, "Defendants") respectfully request that this Court allow them to file their Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Further Responses to Class' Questions for Per Ekholdt Concerning Exhibit 13 and the Production of Documents Underlying Wilmer, Cutler & Pickering Reports in excess of ten pages. The brief and supporting materials are submitted herewith.

At the status conference held on October 19, 2006, the Court requested that in their brief on this motion, Defendants thoroughly and clearly explain the facts regarding the circumstances and terms of the WilmerHale engagement at issue, as well as the facts surrounding any alleged waiver of the attorney-client privilege or work product protection for documents relating to that engagement. Additionally, Plaintiffs' motion included numerous legal arguments concerning the application and waiver of the attorney-client privilege and work product protection, which Defendants could not properly address without engaging in extensive legal analysis. In order to comply with the Court's request for a thorough statement of facts and to address these legal arguments, a memorandum in excess of ten pages but not more than seventeen pages is necessary. While Defendants have attempted to fairly and completely address the factual and legal issues raised by Plaintiffs' motion with as much brevity as possible, any further reduction would impact the quality and clarity of the presentation made to the Court.

Dated: November 3, 2006
Chicago, Illinois

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