

**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 COMPEL HOUSEHOLD DEFENDANTS TO PRODUCE
DOCUMENTS RESPONSIVE TO THE CLASS' FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS**

1. Lead plaintiffs and the Class respectfully move this Court for an order compelling defendants to produce responsive documents to Request Nos. 1-3; 5; 8; 9-10; 19 and 20 of the Class' Fourth Request for Production of Documents ("Fourth Request").

2. On October 3, 2006, the Class served its Fourth Request. Defendants responded on November 6, 2006. Defendants have refused to produce any documents in response to any requests, including the specific requests referenced above. The parties have met and conferred on the Fourth Request, but cannot reach an agreement.

3. The Class files this motion to compel production of documents responsive to the specific requests referenced above. It is undisputed that defendants have the documents that the Class seeks. The documents are highly relevant to the Class' case. Production of the documents sought by the Class will not impose an undue burden on defendants. The Class respectfully requests this Court grant the Class' motion for the reasons as outlined in the accompanying memorandum in support of this motion.

DATED: December 12, 2006

Respectfully submitted,

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