

**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.)	
_____)	

**LEAD PLAINTIFFS' MOTION REQUESTING A STATUS CONFERENCE
FOR JANUARY 8, 2007**

Lead Plaintiffs, PACE International Union-Management Pension Fund, International Union of Operating Engineers Local 132 and Glickenhau & Company (“Lead Plaintiffs”), on behalf of the Class hereby move to respectfully request a status conference before the District Court for January 8, 2007 at 9:30 a.m. Lead Plaintiffs wish to apprise the Court of various pertinent deadlines, establish a schedule for summary judgment and trial and to discuss other pending matters. In support, Lead Plaintiffs state as follows:

1. On August 10, 2006, Magistrate Judge Nan. R. Nolan, to whom this Court referred this matter for all pre-trial discovery, set a January 31, 2007 deadline for the completion of fact discovery.

2. At the December 15, 2006 status conference before the Magistrate, she suggested that parties request a status conference before the District Court for January 8, 2007. *See* December 15, 2006 Minute Order (Dkt. No. 831).

3. Lead Plaintiffs have been diligently engaged in discovery in order to accomplish the January 31, 2007 goal. Lead Plaintiffs have already taken 39 depositions and have at least 6 depositions scheduled in January 2007. Additionally, there are at least 10 depositions (mostly of third-parties) that are yet to be scheduled based upon various objections currently pending before the Court or objections that parties intend to file with the Court.

4. Additionally, Lead Plaintiffs would like to have a schedule in place with respect to summary judgment and trial.

5. Lead Plaintiffs intend to file a status report outlining all pending matters and provide a proposed schedule to the Court on how they intend to proceed to trial in this case.

6. Accordingly, Lead Plaintiffs request that the Court schedule a status conference for January 8, 2007 at 9:30 a.m.

DATED: December 19, 2006

Respectfully submitted,

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