

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LAWRENCE E. JAFFE PENSION PLAN, ON BEHALF OF ITSELF AND ALL OTHERS SIMILARLY SITUATED,	)	
	)	
Plaintiff,	)	Lead Case No. 02-C-5893 (Consolidated)
	)	
- <i>against</i> -	)	Judge Ronald A. Guzman
	)	Magistrate Judge Nan R. Nolan
HOUSEHOLD INTERNATIONAL, INC., ET AL.,	)	
	)	
Defendants.	)	
	)	

**HOUSEHOLD DEFENDANTS' MOTION FOR  
LEAVE TO FILE *INSTANTER* MEMORANDUM  
OF LAW IN EXCESS OF TEN PAGES**

Defendants Household International, Inc., Household Finance Corp. and former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar (the "Household Defendants" or "Defendants"), by and through their attorneys, hereby move this Court for leave to file their memorandum of law in support of Household Defendants' Motion for Sanctions Including a Recommendation of Dismissal for Failure to Respond and to Compel Responses to Defendants' Court Authorized Supplement to Defendants' Second Set of Interrogatories in excess of ten pages, attached hereto. In support thereof, the Household Defendants state as follows:

1. Defendants first requested the information at issue in this motion on February 13, 2006. Since that time, Defendants have served additional request subject to an Order of this Court. Nevertheless, Plaintiffs have repeatedly refused to provide complete and substantive responses.

2. On December 15, 2006 the Court requested that the parties brief this issue and the Court set a briefing schedule.

3. Comprehensively addressing the inadequacy of Plaintiffs' responses, the bad faith refusal of Plaintiffs to participate in discovery, and the factual history of these interrogatories requires more than the ten pages. While Defendants have attempted to fairly and completely address the factual and legal issues raised by Plaintiffs' refusal to adequately respond to Defendants' interrogatories with as much brevity as possible, any further reduction would impact the quality and clarity of the presentation made to the Court.

WHEREFORE, for the reasons stated above, Defendants respectfully request that they be granted leave to file a Memorandum of Law of thirteen pages.

Dated: December 22, 2006  
Chicago, Illinois

Respectfully submitted,

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