

**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,)

- *against* -)

HOUSEHOLD INTERNATIONAL, INC., ET AL.,)

Defendants.)

Lead Case No. 02-C-5893
(Consolidated)

CLASS ACTION

Judge Ronald A. Guzman
Magistrate Judge Nan R. Nolan

**HOUSEHOLD DEFENDANTS' MOTION FOR SANCTIONS
INCLUDING RECOMMENDATION OF DISMISSAL FOR
FAILURE TO RESPOND AND TO COMPEL RESPONSES TO
DEFENDANTS' COURT AUTHORIZED SUPPLEMENT TO
DEFENDANTS' SECOND SET OF INTERROGATORIES**

Defendants Household International, Inc. and Household Finance Corp. and its former officers and directors William F. Aldinger, David A. Schoenholz, Gary Gilmer, and J.A. Vozar ("Defendants") hereby move pursuant to Fed. R. Civ. P. 37(b)(2) and 37(a)(2)(B) for the Court to impose monetary and substantive sanctions including a recommendation of dismissal for Plaintiffs' failure to respond to Household Defendants' Court Authorized Supplement to Household Defendants' Second Set of Interrogatories to Lead Plaintiffs and to compel responses for the reasons stated in the accompanying Memorandum of Law.

Dated: December 22, 2006

Chicago, Illinois

EIMER STAHL KLEVORN & SOLBERG LLP

By: /s/ Christine M. Johnson
Nathan P. Eimer
Adam B. Deutsch
Christine Johnson
224 South Michigan Avenue
Suite 1100
Chicago, Illinois 60604
(312) 660-7600

-and-

CAHILL GORDON & REINDEL LLP

Thomas J. Kavalier
Howard G. Sloane
Landis C. Best
Patricia Farren
David R. Owen
80 Pine Street
New York, NY 10005
(212) 701-3000

*Attorneys for Defendants Household International,
Inc, Household Finance Corporation, William F.
Aldinger, David A. Schoenholz, Gary Gilmer and J.
A. Vozar*