

**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 FILE *INSTANTER* BRIEF IN EXCESS OF TEN PAGES RE  
MOTION TO COMPEL ANDREW KAHR DOCUMENTS IMPROPERLY WITHHELD  
AS PRIVILEGED OR DESTROYED BY THE HOUSEHOLD DEFENDANTS**

Now come the Lead Plaintiffs, on behalf of the Class, respectfully request that this Court allow the Class to file its Motion to Compel Andrew Kahr Documents Improperly Withheld as Privileged or Destroyed by the Household Defendants in excess of ten pages. In support thereof, Lead Plaintiffs and the Class state as follows:

1. The subject of the Class' motion is to compel the Household defendants to produce documents relating to Household's consultant, Andrew Kahr, which have been improperly withheld on the basis of privilege, or destroyed.

2. The procedural, legal and factual issues raised by the Class' motion are complex and require detailed analysis. In order to properly address these complex subjects and the numerous factual and legal issues relating to these issues, a memorandum in excess of 10 pages but not more than 14 pages is necessary.

WHEREFORE, for the foregoing reasons, the Class respectfully requests that the Court grant it leave to file a Motion to Compel Andrew Kahr Documents Improperly Withheld as Privileged or Destroyed by the Household Defendants in excess of ten pages.

DATED: January 9, 2007

Respectfully submitted,

LERACH COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
PATRICK J. COUGHLIN (90785466)  
AZRA Z. MEHDI (90785467)  
D. CAMERON BAKER (154452)  
MONIQUE C. WINKLER (90786006)  
LUKE O. BROOKS (90785469)  
JASON C. DAVIS (4165197)  
BING Z. RYAN (228641)

s/ Azra Z. Mehdi  
\_\_\_\_\_  
AZRA Z. MEHDI

100 Pine Street, Suite 2600  
San Francisco, CA 94111  
Telephone: 415/288-4545  
415/288-4534 (fax)

LERACH COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
WILLIAM S. LERACH  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

Lead Counsel for Plaintiffs

MILLER LAW LLC  
MARVIN A. MILLER  
LORI A. FANNING  
101 North Wacker Drive, Suite 2010  
Chicago, IL 60606  
Telephone: 312/525-8320  
312/525-8231 (fax)

Liaison Counsel

LAW OFFICES OF LAWRENCE G.  
SOICHER  
LAWRENCE G. SOICHER  
110 East 59th Street, 25th Floor  
New York, NY 10022  
Telephone: 212/883-8000  
212/355-6900 (fax)

Attorneys for Plaintiff