

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

LAWRENCE E. JAFFE, Pension Plan)
and on behalf of all others)
similarly situated,)
)
Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.)
ARTHUR ANDERSEN, L.L.P.,)
)
Defendants.)

MARC ABRAMS, individually and on)
behalf of all others similarly situated,)
)
Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)
)
Defendants.)

EISBERRY HOLDINGS, LTD., on)
behalf of itself and all others)
similarly situated,)
)
Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)
)
Defendants.)

No. 02 C 5893

Judge Ronald A. Guzman

No. 02 C 5934 ✓

Judge Joan H. Lefkow

No. 02 C 6130 ✓

Judge George M. Marovich

FILED
OCT 04 2002
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

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OCT 15 2002

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

JEFFREY P. JANNETT, on)
behalf of himself and all others)
similarly situated,)

Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)

Defendants.)

No. 02 C 6326 ✓

Judge Marvin E. Aspen

BERNARD DOLOWICH, on)
behalf of himself and all others)
similarly situated,)

Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)

Defendants.)

No. 02 C 6352 ✓

Judge Rebecca R. Pallmeyer

RONALD H. HANSCHMAN on)
behalf of himself and all others)
similarly situated,)

Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)

Defendants.)

No. 02 C 6859 ✓

Judge Charles R. Norgle

CERTIFICATE OF SERVICE

I, Lori A. Fanning, one of the attorneys for plaintiffs Abrams, Hanschman and Friedel, hereby certify that I caused the *Notice of Motion and Motion for a Finding of Relatedness* to be served on all counsel on the attached service list by placing a copy of the same in the United States Mail at 30 North LaSalle Street, Chicago, Illinois this 4th day of October, 2002.


Lori A. Fanning

SERVICE LIST

Nathan P. Eimer
Adam Deutsch
EIMER STAHL KLEVORN & SOLBERG
224 S. Michigan Ave.
Suite 110
Chicago, IL 60605

William S. Lerach
Darren J. Robbins
**MILBERG WEISS BERSHAD
HYNES & LERACH LLP**
401 B Street
Suite 1700
San Diego, California 92101
(619) 231-1058

Paul J. Geller
Howard K. Coates, Jr.
Jack Reise
**CAULEY, GELLER, BOWMAN
& COATES, LLP**
2255 Glades Road
Suite 421A
Boca Raton, Florida 33431
(561) 750-3000

Marc A. Topaz
SCHIFFRIN & BARROWAY, LLP
Three Bala Plaza East, Suite 400
Bala Cynwyd, Pennsylvania 19004
(610) 667-7706

Corey D. Holzer
Michael I. Fistel, Jr.
HOLZER & HOLZER
6135 Barfield Road, Suite 102
Atlanta, Georgia 30328
(404) 847-0085

John G. Emerson, Jr.
THE EMERSON FIRM
P.O. Box 25336
Little Rock, Arkansas 72221
(501) 907-2555

Gary L. Specks
203 North LaSalle Street
Suite 2100
Chicago, Illinois 60601
(312) 558-1585

Carol V. Gilden
Michael E. Moskovitz
**MUCH SHELIST FREED DENENBERG
AMENT & RUBENSTEIN, P.C.**
200 North LaSalle Street
Suite 2100
Chicago, Illinois 60601
(312) 346-3100

Mary Jane Edelstein Fait
**WOLF HALDENSTEIN ADLER
FREEMAN & HERZ LLC**
656 West Randolph Street
Suite 500W
Chicago, Illinois 60661
(312) 466-9200

Robert D. Allison
ROBERT D. ALLISON & ASSOCIATES
122 South Michigan Avenue
Suite 1850
Chicago, Illinois 60603
(312) 427-7600

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Defendants.)

No. 02 C 6326 ✓

Judge Marvin E. Aspen

BERNARD DOLOWICH, on)
behalf of himself and all others)
similarly situated,)
)
Plaintiff,)

v.)

HOUSEHOLD INTERNATIONAL, INC.,)
et al.,)
)
Defendants.)

No. 02 C 6352 ✓

Judge Rebecca R. Pallmeyer

RONALD H. HANSCHMAN on)
behalf of himself and all others)
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HOUSEHOLD INTERNATIONAL, INC.,)
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)
Defendants.)

No. 02 C 6859 ✓

Judge Charles R. Norgle

4. On September 5, 2002, Plaintiff in the *Jannett v. Household International, Inc., et al.* litigation commenced his class action complaint against defendants, attached hereto as Exhibit D.

5. On September 6, 2002, Plaintiff in the *Dolowich v. Household International, Inc., et al.* litigation commenced his class action complaint against defendants, attached hereto as Exhibit E.

6. On September 25, 2002, Plaintiff in the *Hanschman v. Household International, Inc., et al.* litigation commenced his class action complaint against defendants, attached hereto as Exhibit F.

7. On October 2, 2002, Plaintiff in the *Friedel v. Household International, Inc., et al.* litigation commenced his class action complaint against defendants, attached hereto as Exhibit G.

8. All actions arise from the same alleged improper conduct of the defendants and seek similar relief. Therefore, the handling and management of the actions by the same judge is likely to result in a substantial saving of judicial time and effort. The *Jaffe* action has not progressed to the point where designating these cases as related would likely delay the proceedings in the earlier filed action.

9. All classes asserted in the annexed complaints are substantially the same. If this court enters a finding that all subsequently filed actions are related, plaintiffs contemplate filing a consolidated class action complaint which will eliminate any minimal differences among them.

10. This motion is brought before the filing of any answer or motion in any action because plaintiff believes that it is in the best interests of the parties and the Court to quickly relate these cases.

11. In all actions, plaintiffs have requested a jury.

12. It is believed that judicial economy will be promoted by relating these actions so that there will be a consolidated complaint and avoidance of duplication of motion practice and/or discovery.

13. Counsel are attempting to determine if other actions exist and will advise the Court upon obtaining such knowledge.

14. Plaintiffs' counsel reasonably believes that it would be prudent for defendants not to have to respond to the extant complaints until after a lead plaintiff and lead counsel are appointed by the Court pursuant to the Private Securities Litigation Reform Act ("PSLRA") and thirty (30) days after the filing of a consolidated amended complaint.

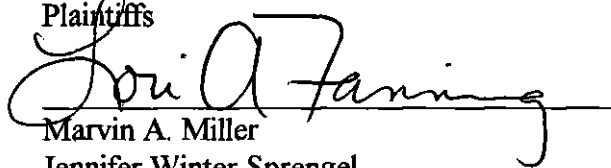
15. Nothing in this motion shall prejudice defendants' rights to oppose certification of a class.

WHEREFORE, Plaintiff respectfully requests this Court to make a finding of relatedness pursuant to Local Rule 40.4 and to extend the time for defendants to answer or move as to all the related complaints until 30 days after the filing of a Consolidated Amended Complaint and to stay discovery, including Rule 26 disclosures, until after a ruling on any motion to dismiss.

Dated: October 4, 2002

Respectfully submitted,
Plaintiffs

By:



Marvin A. Miller
Jennifer Winter Sprengel
Lori A. Fanning
MILLER FAUCHER and CAFFERTY LLP
30 North LaSalle Street, Suite 3200
Chicago, Illinois 60602
(312) 782-4880

*Attorneys for Plaintiffs Abrams, Hanschman
and Friedel*

William S. Lerach
Darren J. Robbins
**MILBERG WEISS BERSHAD
HYNES & LERACH LLP**
401 B Street
Suite 1700
San Diego, California 92101
(619) 231-1058

Paul J. Geller
Howard K. Coates, Jr.
Jack Reise
CAULEY, GELLER, BOWMAN & COATES, LLP
2255 Glades Road
Suite 421A
Boca Raton, Florida 33431
(561) 750-3000

Marc A. Topaz
SCHIFFRIN & BARROWAY, LLP
Three Bala Plaza East, Suite 400
Bala Cynwyd, Pennsylvania 19004
(610) 667-7706

Attorneys for Plaintiff Abrams

Corey D. Holzer
Michael I. Fistel, Jr.
HOLZER & HOLZER
6135 Barfield Road, Suite 102
Atlanta, Georgia 30328
(404) 847-0085

Attorneys for Plaintiff Hanschman

John G. Emerson, Jr.
THE EMERSON FIRM
P.O. Box 25336
Little Rock, Arkansas 72221
(501) 907-2555

Attorneys for Plaintiff Friedel

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