### UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

TIMOTHY J. PAGLIARA

Plaintiff,

v.

Civil Action No. 1:16-cv-00337-JCC-JFA

FEDERAL HOME LOAN MORTGAGE CORPORATION,

Defendant.

# JOINT MOTION TO AMEND BRIEFING SCHEDULE ON DEFENDANT'S MOTION TO STAY, OR IN THE ALTERNATIVE, TO SUBSTITUTE THE FEDERAL HOUSING FINANCE AGENCY AS PLAINTIFF

Plaintiff Timothy J. Pagliara and Defendant Federal Home Loan Mortgage Corporation ("Freddie Mac") and its conservator, the Federal Housing Finance Agency ("FHFA") (all together, the "Parties") hereby request that the Court enter an order amending the briefing schedule on Defendant's Motion to Stay or in the Alternative to Substitute FHFA as Plaintiff (the "Motion").

The hearing on the Motion is set for May 5, 2016. The Parties request that the Court set the deadline for Plaintiff's brief opposing the Motion on April 20, 2016, and the deadline for Defendant's reply brief on April 29, 2016.

The Parties waive a hearing on this motion and attach a proposed order as Exhibit 1 hereto.

### Respectfully Submitted,

/s/

N. Thomas Connally, VSB No. 36318 Christopher T. Pickens, VSB No. 75307 HOGAN LOVELLS US LLP Park Place II, Ninth Floor 7930 Jones Branch Drive

Tel: 703-610-6194 Fax: 703-610-6200

tom.connally@hoganlovells.com christopher.pickens@hoganlovells.com

Counsel for Plaintiff Timothy J. Pagliara

/s/

Ian S. Hoffman, VSB No. 75002
Howard N. Cayne
Asim Varma
David B. Bergman
ARNOLD & PORTER LLP
601 Massachusetts Avenue NW
Washington, D.C. 20001
Telephone: (202) 942-5000
Facsimile: (202) 942-5999
ian.hoffman@aporter.com
howard.cayne@aporter.com
asim.varma@aporter.com
david.bergman@aporter.com

Attorneys for Federal Housing Finance Agency

/s/

Taylor T. Lankford, VSB No. 80599
Michael J. Ciatti, VSB No. 40607
Graciela M. Rodriguez
Merritt E. McAlister
KING & SPALDING LLP
1700 Pennsylvania Avenue NW, Ste. 200
Washington, D.C. 20006
Telephone: (202) 737-0500
Facsimile: (202) 626-3737
tlankford@kslaw.com
mciatti@kslaw.com
gmrodriguez@kslaw.com
mmcalister@kslaw.com
Attorneys for Defendant Federal Home Loan
Mortgage Corporation

Dated: April 4, 2016

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of April, 2016, a true and complete copy of the foregoing was filed via the court's CM/ECF system and notice of electronic filing was sent to the following counsel of record:

Ian S. Hoffman
Arnold & Porter, LLC
601 Massachusetts Avenue NW
Washington, D.C. 20001
Ian.Hoffman@aporter.com
Howard.Cayne@aporter.com
Asim.Varma@aporter.com
David.Bergman@aporter.com

Taylor T. Lankford
Michael J. Ciatti
King & Spaulding, LLC
1700 Pennsylvania Avenue NW, Ste. 200
Washington, D.C. 20006
tlankford@kslaw.com
mciatti@kslaw.com
gmrodriguez@kslaw.com
mmcalister@kslaw.com

In addition, a copy of the foregoing was served via electronic mail on the following:

Howard N. Cayne
Asim Varma
David B. Bergman
Arnold & Porter, LLC
601 Massachusetts Avenue NW
Washington, D.C. 20001
Ian.Hoffman@aporter.com
Howard.Cayne@aporter.com
Asim.Varma@aporter.com
David.Bergman@aporter.com

Graciela M. Rodriguez Merritt E. McAlister King & Spaulding, LLC 1700 Pennsylvania Avenue NW, Ste. 200 Washington, D.C. 20006 tlankford@kslaw.com mciatti@kslaw.com gmrodriguez@kslaw.com mmcalister@kslaw.com

/s/ Christopher T. Pickens

Christopher T. Pickens, VSB No. 75307 Hogan Lovells US LLP Park Place II, Ninth Floor 7930 Jones Branch Drive McLean, VA 22102

Tel: 703-610-6194 Fax: 703-610-6200

E-mail: christopher.pickens@hoganlovells.com

Counsel for Plaintiff Timothy J. Pagliara

# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

TIMOTHY J. PAGLIARA	
Plaintiff,	
v.	Civil Action No. 1:16-cv-00337-JCC-JFA
FEDERAL HOME LOAN MORTGAGE CORPORATION,	
Defendant.	
[PROPOSED] ORDER ON JOINT MOTION TO AMEND BRIEFING SCHEDULE ON DEFENDANT'S MOTION TO STAY, OR IN THE ALTERNATIVE, TO SUBSTITUTE THE FEDERAL HOUSING FINANCE AGENCY AS PLAINTIFF	
Upon consideration of the Parties' Joint Motion to Amend Briefing Schedule ("Motion to	
Extend Briefing Schedule"), and the entire record	d herein, it is hereby
ORDERED that the Motion to Amend B	riefing Schedule is GRANTED; and it is further
ORDERED that Plaintiff's brief opposing Defendant's Motion to Stay, or in the	
Alternative, to Substitute FHFA as Plaintiff shall be filed by April 20, 2016; and it is further	

Dated:\_\_\_\_\_

Hon. John F. Anderson
United States Magistrate Judge

Alternative, to Substitute FHFA as Plaintiff shall be filed by April 29, 2016.

ORDERED that Defendant's reply brief in support of its Motion to Stay, or in the

COPIES TO:

N. Thomas Connally, VSB No. 36318 Christopher T. Pickens, VSB No. 75307 HOGAN LOVELLS US LLP Park Place II, Ninth Floor 7930 Jones Branch Drive

Tel: 703-610-6194 Fax: 703-610-6200

tom.connally@hoganlovells.com christopher.pickens@hoganlovells.com

#### Counsel for Plaintiff Timothy J. Pagliara

Ian S. Hoffman, VSB No. 75002
Howard N. Cayne
Asim Varma
David B. Bergman
ARNOLD & PORTER LLP
601 Massachusetts Avenue NW
Washington, D.C. 20001
Telephone: (202) 942-5000
Facsimile: (202) 942-5999
ian.hoffman@aporter.com
howard.cayne@aporter.com
david.bergman@aporter.com

#### Attorneys for Federal Housing Finance Agency

Taylor T. Lankford, VSB No. 80599
Michael J. Ciatti, VSB No. 40607
Graciela M. Rodriguez
Merritt E. McAlister
KING & SPALDING LLP
1700 Pennsylvania Avenue NW, Ste. 200
Washington, D.C. 20006
Telephone: (202) 737-0500
Facsimile: (202) 626-3737
tlankford@kslaw.com
mciatti@kslaw.com
gmrodriguez@kslaw.com
mmcalister@kslaw.com

Attorneys for Defendant Federal Home Loan Mortgage Corporation