UNITED STATES COURT OF FEDERAL CLAIMS

LOUISE RAFTER, JOSEPHINE RATTIEN, STEPHEN RATTIEN, and PERSHING SQUARE CAPITAL MANAGEMENT, L.P., Plaintiffs, v. THE UNITED STATES OF AMERICA, Defendant, FEDERAL NATIONAL MORTGAGE ASSOCIATION, Nominal Defendant.

PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE SECOND AMENDED COMPLAINT

Pursuant to RCFC 6(b)(1)(A), Plaintiffs respectfully move the Court for an order giving

Plaintiffs an additional two weeks, until March 8, 2018, to file their Second Amended

Complaint.

Under the current schedule (Doc. 22), Plaintiffs' Second Amended Complaint is due February 22, 2018; Defendant's omnibus motion to dismiss is due June 22, 2018; Plaintiffs' response to Defendant's omnibus motion to dismiss is due September 20, 2018; and Defendant's reply in support of its omnibus motion to dismiss is due December 19, 2018.

On February 19, plaintiffs' counsel in *Washington Federal v. United States*, No. 13-385C, informed us that Washington Federal would be seeking a two-week extension of time to file an amended complaint. Plaintiffs therefore are requesting this extension to ensure that all of the related cases stay on the same schedule. Plaintiffs respectfully request a two-week extension, until March 8, 2018, to file their Second Amended Complaint. Plaintiffs further request that the

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deadline for Defendant's omnibus motion to dismiss be extended to June 29, 2018. Plaintiffs request that all other deadlines remain the same.

Plaintiffs have not previously sought an extension of time related to their Second Amended Complaint. Plaintiffs have conferred with counsel for the Government, and the Government does not oppose Plaintiffs' Motion.

Respectfully submitted,

Dated: February 21, 2018

By: /s Gregory P. Joseph____

Gregory P. Joseph Counsel of Record

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