

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

<p><b>In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations</b></p> <hr/> <p><b>THIS DOCUMENT RELATES TO: ALL CASES</b></p>	<p>Misc. Action No. 13-mc-1288 (RCL)</p> <p><b><u>CLASS ACTION</u></b></p>
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**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Co-Lead Plaintiffs N. Bradford Isbell, Joseph Cacciapalle, John Cane, Estate of Francis J. Dennis, Michelle M. Miller, Marneu Holdings, Co., 111 John Realty Corp., United Equities Commodities, Co., Charles Rattley, and Timothy J. Cassell (collectively, "Plaintiffs"), hereby move for entry of an Order, in the form attached hereto, certifying this action as a class action pursuant to Rule 23(a) and 23(b) of the Federal Rules of Civil Procedure on behalf of four Classes consisting of:

- (1) All persons and entities who held shares of Fannie Mae Preferred Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the "Fannie Preferred Class");
- (2) All persons and entities who held shares of Freddie Mac Preferred Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the "Freddie Preferred Class");
- (3) All persons and entities who held shares of Fannie Mae Common Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the "Fannie Common Class"); and
- (4) All persons and entities who held shares of Freddie Mac Common Stock on August 17, 2012 and who were damaged thereby, and their successors in interest (meaning current shareholders) (the "Freddie Common Class").

Excluded from all Classes are the Defendants.

Plaintiffs also moves for an Order designating Plaintiffs as Co-Lead class representatives. Plaintiffs also move for an Order designating the law firms of Boies Schiller Flexner LLP, Kessler Topaz Meltzer & Check LLP, Grant & Eisenhofer, P.A., and Bernstein Litowitz Berger & Grossmann LLP as Co-Lead Class Counsel.

The reasons for this motion are fully set forth in the Memorandum of Law filed simultaneously herewith.

Dated: August 16, 2018

Respectfully submitted,

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