

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FAIRHOLME FUNDS, INC., *et al.*,

Plaintiffs,

v.

FEDERAL HOUSING FINANCE AGENCY, *et al.*,

Defendants.

Civil No. 13-1053 (RCL)

ARROWOOD INDEMNITY COMPANY,
et al.,

Plaintiffs,

v.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION, *et al.*,

Defendants.

Civil No. 13-1439 (RCL)

In re Fannie Mae/Freddie Mac Senior Preferred
Stock Purchase Agreement Class Action Litigations

Miscellaneous No. 13-1288 (RCL)

This document relates to:
ALL CASES

CLASS ACTION

**STIPULATION EXTENDING BRIEFING DEADLINES FOR MOTION FOR PARTIAL
RECONSIDERATION**

Plaintiffs and Defendants in the three above-captioned cases hereby stipulate that

- (1) Plaintiffs shall have a seven-day extension to file their response to Defendants’ Motion for Partial Reconsideration of Denial of Motion to Dismiss Implied Covenant Claims (“Motion for Partial Reconsideration”), and (2) Defendants shall have a seven-day extension to file their reply

in support of their Motion for Partial Reconsideration. The new deadline for Plaintiffs' response shall be November 5, 2018, and the new deadline for Defendants' reply shall be November 19, 2018. Specifically, Plaintiffs and Defendants stipulate as follows:

1. On September 28, 2018, this Court issued an Memorandum Opinion and Order dismissing Plaintiffs' claims alleging breach of contract, breach of fiduciary duty, and violation of Delaware and Virginia statutes, but declining to dismiss Plaintiffs' claims for breach of the implied covenant of good faith and fair dealing. *Fairholme Funds, Inc. v. FHFA*, 2018 WL 4680197 (D.D.C. Sept. 28, 2018).

2. On October 15, 2018, Defendants filed a Motion for Partial Reconsideration of the Court's ruling declining to dismiss Plaintiffs' claims for breach of the implied covenant of good faith and fair dealing [ECF No. 87 in Civil No. 13-1053; ECF No. 95 in Civil No. 13-1439; ECF No. 89 in Misc. No. 13-1288].

3. Under the Local Rules, Plaintiffs' response to the Motion for Partial Reconsideration is due on October 29, 2018. *See* LCvR 7(b). Defendants' reply in support of the Motion for Partial Reconsideration is due on November 5, 2018. *See* LCvR 7(d).

4. Due to competing demands on other matters, Plaintiffs and Defendants agree that good cause exists for extensions of the deadlines for the response and the reply.

WHEREFORE, the parties respectfully request that the Court approve this stipulation extending Plaintiffs' deadline to file a response to the Motion for Partial Reconsideration by seven days to November 5, 2018, and extending Defendants' deadline to file a response to the Motion for Partial Reconsideration by seven days to November 19, 2018.

Dated: October 22, 2018

Respectfully submitted,

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