

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

JOSHUA J. ANGEL

*Plaintiff,*

v.

FEDERAL HOME LOAN MORTGAGE  
CORPORATION, et al.,

*Defendants,*

Case No. 1:18-cv-01142

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME  
TO FILE THEIR RESPONSE TO PLAINTIFF'S MOTION TO ALTER OR AMEND  
JUDGMENT AND FOR LEAVE TO AMEND THE COMPLAINT**

1. Defendants hereby move for an extension of time to and including April 15, 2019 for Defendants to respond to Plaintiffs' Motion to alter or amend judgment and for leave to amend the complaint. Plaintiff does not oppose the requested extension. In support of this motion, Defendants state as follows:

2. On March 6, 2019, this Court granted Defendants' motion to dismiss the complaint. Dkt. 24

3. On March 18, 2019, Plaintiff filed motions pursuant to Rule 59(e) to alter or amend judgment and Rule 15(a) for leave to amend the complaint.

4. Pursuant to Local Rule 7(b), absent an extension, the deadline for Defendants to respond to the motion is April 1, 2019.

5. Defendants need additional time to prepare their response to Plaintiff's motion due to the schedules and other commitments of the attorneys responsible for preparing the

response, and the need to coordinate the response among multiple Defendants represented by different counsel. No prejudice will occur to either party as a result of a two week extension.

6. Counsel for Defendants have conferred with Plaintiff, who does not oppose the relief requested herein.

WHEREFORE, Defendants respectfully request that the Court extend their time to file their response to Plaintiff's Motion to alter or amend judgment and for leave to amend the complaint to and including April 15, 2019. A proposed order granting the requested relief is submitted herewith.

Dated: March 21, 2019

Respectfully submitted,

/s/ Howard N. Cayne  
Howard N. Cayne (D.C. Bar # 331306)  
Asim Varma (D.C. Bar # 426364)  
David B. Bergman (D.C. Bar # 435392)  
ARNOLD & PORTER KAYE SCHOLER LLP  
601 Massachusetts Ave NW  
Washington, D.C. 20001  
(202) 942-5000  
Howard.Cayne@apks.com  
Asim.Varma@apks.com  
David.Bergman@apks.com

*Attorneys for the Federal Housing Finance Agency*

s/ Michael J. Ciatti  
Michael J. Ciatti (D.C. Bar # 467177)  
KING & SPALDING LLP  
1700 Pennsylvania Ave. N.W.  
Washington, DC 20006  
Tel: (202) 626-5508  
Fax: (202) 626-3737  
mciatti@kslaw.com

*Attorney for the Federal Home Loan Mortgage Corp. and individual directors*

s/ Meaghan VerGow  
Meaghan VerGow (D.C. Bar # 977165)  
O'MELVENY & MYERS LLP  
1625 Eye Street, N.W.  
Washington, DC 20006  
Tel: (202) 383-5300  
Fax: (202) 383-5414  
mvergow@omm.com

*Attorney for the Federal National Mortgage Association and individual directors*

