

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

FAIRHOLME FUNDS, INC., <i>et al.</i> ,  Plaintiffs,  v.  THE FEDERAL HOUSING FINANCE AGENCY, <i>et al.</i> ,  Defendants	Civil No. 13-1053 (RCL)
ARROWOOD INDEMNITY COMPANY, <i>et al.</i> ,  Plaintiffs,  v.  FEDERAL NATIONAL MORTGAGE ASSOCIATION, <i>et al.</i> ,  Defendants.	Civil No. 13-1439 (RCL)
In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations  _____  This document relates to: ALL CASES	Misc. No. 13-1288 (RCL)


**[PROPOSED] SECOND AMENDED SCHEDULING ORDER**

It is hereby **ORDERED** that:

1. Fact discovery shall close on **April 30, 2020**.
2. The deadline for seeking leave to add additional parties or amend the pleadings is **30 days** after the close of fact discovery.
3. Regarding expert discovery:
  - a. Plaintiffs' expert witness reports shall be produced by **June 30, 2020**;
  - b. Deposition of Plaintiffs' experts shall be conducted by **July 31, 2020**;

- c. Defendants' rebuttal expert reports shall be produced by **August 28, 2020**;  
and
  - d. All expert discovery, including deposition of Defendants' experts, shall be completed by **October 2, 2020**.
4. Regarding class certification:
- a. Plaintiffs' motion for class certification is due on **June 30, 2020**;
  - b. Defendants' opposition is due on **August 28, 2020**; and
  - c. Plaintiffs' reply is due on **September 11, 2020**.
5. Regarding motions for summary judgment:
- a. Defendants shall file their motion for summary judgment on or before **October 30, 2020**;
  - b. Plaintiffs' response and cross-motion for summary judgment is due **30 days** after the filing of Defendants' motion for summary judgment;
  - c. Defendants' reply and response is due **30 days** after the filing of Plaintiffs' response and cross-motion for summary judgment; and
  - d. Plaintiffs' reply is due **14 days** after the filing of Defendants' response.
6. Trial is set for **March 31, 2021**, or at the Court's earliest convenience thereafter, with a pretrial conference **30 to 60 days beforehand**, the exact date to be set later.

Dated: 12/23/19

  
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U.S.D.J.