

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

<p>FAIRHOLME FUNDS, INC., <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>THE FEDERAL HOUSING FINANCE AGENCY, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil No. 13-1053 (RCL)</p>
<p>ARROWOOD INDEMNITY COMPANY, <i>et al.</i>,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>FEDERAL NATIONAL MORTGAGE ASSOCIATION, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	<p>Civil No. 13-1439 (RCL)</p>
<p>In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations</p> <hr style="width: 25%; margin-left: 0;"/> <p>This document relates to: ALL CASES</p>	<p>Miscellaneous No. 13-1288 (RCL)</p>

**JOINT MOTION TO ADJOURN SECOND AMENDED  
SCHEDULING ORDER DEADLINES**

Plaintiffs in the above-captioned actions (collectively, the “Plaintiffs”), as well as Defendants Federal Housing Finance Agency (“FHFA”), FHFA Director Mark Calabria, the Federal National Mortgage Association, and the Federal Home Loan Mortgage Corporation (collectively, “Defendants”), hereby move the Court for entry of an order adjourning the deadlines in the Second Amended Scheduling Order entered by the Court on December 23, 2019.

Under the Second Amended Scheduling Order, the fact discovery deadline is April 30, 2020, and the deadline for expert reports and class certification motions is June 30, 2020. Two events outside the parties' control have made it impossible to meet those deadlines. First, the coronavirus crisis, in addition to a more general disruption recognized by the Court's Standing Orders, *In Re: Court Operations in Exigent Circumstances Created by the Covid-19 Pandemic*, has caused the parties to suspend scheduled depositions for at least the month of April. Second, the Department of Treasury has just commenced producing documents pursuant to this Court's Order dated November 8, 2019. The first batch of such documents was produced by Treasury on April 3, 2020. That initial production consisted of 2,795 documents, and a substantial volume of documents remain to be produced.

The length and severity of the COVID-19 disruption is uncertain. Moreover, it is unclear when Treasury will complete its document production. Therefore, rather than propose to the Court an amended schedule with speculative new deadlines that may well require further adjustments, the parties jointly request that the Court adjourn the deadlines in the Second Amended Scheduling Order and allow the parties to attempt to determine and submit to the Court appropriate new deadlines as the situation becomes clearer, but by no later than June 30, 2020.

All parties have been litigating this case in earnest and will continue to do so during this short adjournment. The parties believe the proposed adjournment of the Second Amended Scheduling Order deadlines will aid the administration of justice in this case by allowing the parties to more effectively prepare the case for trial and will prevent prejudice to any party.

Dated: April 27, 2020

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**[PROPOSED] ORDER ADJOURNING SECOND AMENDED  
SCHEDULING ORDER DEADLINES**

It is hereby **ORDERED** that:

1. The deadlines in the Second Amended Scheduling Order are hereby adjourned pending further order of this Court.

2. The parties are directed to submit proposed amended deadlines no later than June 30, 2020.

Dated: \_\_\_\_\_

\_\_\_\_\_  
U.S.D.J.