

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

_____)	
FAIRHOLME FUNDS, INC., <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	No. 13-cv-1053-RCL
)	
FEDERAL HOUSING FINANCE)	
AGENCY, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

CONSENT MOTION FOR EXTENSION OF TIME

The United States Department of the Treasury (“Treasury”) hereby respectfully requests that the Court extend its deadline for responding to Plaintiffs’ sealed motion to compel production of certain documents withheld as privileged, ECF No. 125, by an additional 21 days until July 13, 2021. Good cause exists to grant this motion.

Since Plaintiffs filed their motion on May 18, 2021, the parties have engaged in productive negotiations that have already resolved one of the primary issues raised in the motion—Plaintiffs’ argument regarding waiver of the attorney-client privilege—without the need for the Court’s involvement. The parties continue to engage in a meet and confer process that has the potential to further narrow the issues in dispute, such that additional time would be beneficial to allow these negotiations to continue. The extension requested in this motion will allow this process to play out while also affording Defendants time to prepare a response to issues raised in Plaintiffs’ motion that the parties are unable to resolve through their negotiations.

For these reasons, Treasury respectfully requests that its deadline for responding to Plaintiffs’ motion to compel be extended by an additional 21 days from June 22, 2021 until July 13, 2021. Before

filing this motion, pursuant to Local Civil Rule 7(m), undersigned counsel conferred with counsel for Plaintiffs, who reported that Plaintiffs consent to the relief requested in this motion. A proposed order is attached.

Dated: June 18, 2021

Respectfully submitted

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