

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

<b>In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations</b> <hr/> <b>THIS DOCUMENT RELATES TO: ALL CASES</b>	<b>Misc. Action No. 13-mc-1288 (RCL)</b>  <b><u>CLASS ACTION</u></b>
--	--

**PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

Plaintiffs Joseph Cacciapalle, Michelle M. Miller, Timothy J. Cassell, and Barry P. Borodkin (collectively, "Plaintiffs"), hereby move for entry of an Order, in the form attached hereto, certifying this action as a class action pursuant to Rules 23(a) and 23(b) of the Federal Rules of Civil Procedure on behalf of three Classes consisting of:

- (1) All current holders of junior preferred stock in Fannie Mae as of the date of certification, or their successors in interest to the extent shares are sold after the date of certification and before any final judgment or settlement (the "Fannie Preferred Class");
- (2) All current holders of junior preferred stock in Freddie Mac as of the date of certification, or their successors in interest to the extent shares are sold after the date of certification and before any final judgment or settlement (the "Freddie Preferred Class"); and
- (3) All current holders of common stock in Freddie Mac as of the date of certification, or their successors in interest to the extent shares are sold after the date of certification and before any final judgment or settlement (the "Freddie Common Class").

Excluded from all Classes are the defendants, the United States Department of the Treasury, and their respective officers and directors.

Plaintiffs also move for an Order designating Plaintiffs as class representatives and designating the law firms of Boies Schiller Flexner LLP, Kessler Topaz Meltzer & Check, LLP,

Grant & Eisenhofer, P.A., and Bernstein Litowitz Berger & Grossmann LLP as Co-Lead Class Counsel.

The reasons for this motion are fully set forth in the Memorandum of Law filed simultaneously herewith.

Dated: August 12, 2021

Respectfully submitted,

KESSLER TOPAZ MELTZER & CHECK, LLP  
Eric L. Zagar (*Pro Hac Vice*)  
Lee D. Rudy (*Pro Hac Vice*)  
Grant Goodhart  
280 King of Prussia Rd.  
Radnor, PA 19087  
Tel: (610) 667-7706  
Fax: (610) 667-7056  
ezagar@ktmc.com  
lrudy@ktmc.com  
ggoodhart@ktmc.com

GRANT & EISENHOFER, P.A.  
Michael J. Barry (*Pro Hac Vice*)  
123 Justison Street  
Wilmington, DE 19801  
Tel: (302) 622-7000  
Fax: (302) 622-7100  
mbarry@gelaw.com

/s/ Hamish P.M. Hume

BOIES SCHILLER FLEXNER LLP  
Hamish P.M. Hume (D.C. Bar No. 449914)  
Samuel Kaplan (D.C. Bar No. 463350)  
1401 New York Ave. NW  
Washington, DC 20005  
Tel: (202) 237-2727  
Fax: (202) 237-6131  
hhume@bsfllp.com  
skaplan@bsfllp.com

BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP  
Adam Wierzbowski (*Pro Hac Vice*)  
1251 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 554-1400  
Fax: (212) 554-1444  
adam@blbglaw.com

*Co-Lead Counsel for Plaintiffs*