

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

BERKLEY INSURANCE, CO., *et al.*,

Plaintiffs,

v.

FEDERAL HOUSING FINANCE AGENCY,
et al.,

Defendants.

Case No. 1:13-cv-01053 (RCL)

In re Fannie Mae / Freddie Mac Senior
Preferred Stock Purchase Agreement Class
Action Litigations

Case No. 1:13-mc-01288 (RCL)

This document relates to:
ALL CASES

**DEFENDANTS' UNOPPOSED MOTION FOR AN ENLARGEMENT OF
THE PAGE LIMITATION FOR THEIR RENEWED MOTION
FOR JUDGMENT AS A MATTER OF LAW**

Defendants respectfully request an enlargement of ten pages to file a Rule 50(b) renewed motion for judgment as a matter of law, to permit a motion of up to fifty-five pages in length. Defendants conferred with counsel for Plaintiffs, who represented that they do not oppose this request.

In support of this unopposed motion, Defendants state the following:

1. The above-captioned coordinated actions were initially brought as a class action and multiple individual lawsuits more than ten years ago.

2. Over the intervening years these cases have accrued an extensive procedural history, including dismissal, reversal of dismissal and remand, class certification, partial summary judgment, a first trial resulting in a mistrial, and, in July and August 2023, a second trial resulting in a jury verdict on liability and damages.

3. The three-week second trial also involved a voluminous record, with thousands of transcript pages of fact and expert testimony, *see* Berkley ECF Nos. 263-89 (trial transcripts), and hundreds of exhibits, *see* Class ECF Nos. 384-85, Berkley ECF Nos. 394-95 (parties' final trial exhibit lists).¹

4. Defendants respectfully submit that a ten-page enlargement of the length of their renewed motion for judgment as a matter of law is appropriate in light of the complexity of the case and significance of the legal issues at play.

WHEREFORE, Defendants respectfully request that the Court grant this unopposed motion and permit Defendants to file a Rule 50(b) renewed motion for judgment as a matter of law of up to fifty-five pages in length.

¹ "Class ECF" refers to Case No. 1:13-mc-1288-RCL, and "Berkley ECF" refers to Case No. 1:13-cv-1053-RCL.

Dated: April 12, 2024

Respectfully submitted,

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