

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

J. PATRICK COLLINS, *et al.*,

Plaintiffs,

v.

THE FEDERAL HOUSING FINANCE  
AGENCY, *et al.*,

Defendants.

Civil Action No. 4:16-CV-03113

**CROSS-MOTION OF DEFENDANTS FEDERAL HOUSING FINANCE  
AGENCY AS CONSERVATOR FOR FANNIE MAE AND FREDDIE MAC AND  
FHFA DIRECTOR MELVIN L. WATT FOR SUMMARY JUDGMENT ON  
PLAINTIFFS' CONSTITUTIONAL CLAIM**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants the Federal Housing Finance Agency ("FHFA"), in its capacity as Conservator of the Federal National Mortgage Association and the Federal Home Loan Mortgage Corporation, and FHFA Director Melvin L. Watt (together, the "FHFA Defendants") hereby move for the Court to enter summary judgment in their favor with respect to the constitutional claim set out in Count IV of Plaintiffs' Complaint. As explained in the accompanying Memorandum, the FHFA Defendants are entitled to judgment as a matter of law on Count IV.

Dated: February 27, 2017

Respectfully submitted,

/s/ Thad T. Dameris

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served upon the parties to this action by serving a copy upon each party listed below on February 27, 2017, by the Electronic Filing System.

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