

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 1:16-cv-21221-RNS

ANTHONY R. EDWARDS, *et al.*,

Plaintiffs,

Vs.

DELOITTE & TOUCHE, LLP,

Defendant.

**PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO FHFA'S RENEWED MOTION TO SUBSTITUTE AS PLAINTIFF**

Pursuant to Rule 6, Federal Rules of Civil Procedure, Plaintiffs file this Unopposed Motion for Enlargement of Time to Respond to FHFA's Renewed Motion to Substitute as Plaintiff (Doc. 15) and state as follows:

1. On February 9, 2016, Plaintiffs, several shareholders of the Federal National Mortgage Association ("Fannie Mae"), filed this lawsuit against Defendant, Deloitte & Touche, LLC ("Defendant") in the Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida.

2. On April 6, 2016, before being served, Defendant filed its Notice of Removal (Doc. 1).

3. On April 11, 2016, Defendant filed its Motion to Stay Pending Action by the Judicial Panel on Multidistrict Litigation (Doc. 7). On April 13, 2016, the Court entered its Order Granting Motion to Stay and administratively closed the case. (Doc. 12). The Court denied all pending motions without prejudice to be refiled once the stay is lifted.

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4. On May 26, 2016, the Multidistrict Litigation Panel heard argument on the Federal Housing Finance Agency (“FHFA”) Motion to Transfer. On June 2, 2016, the Panel entered its Order Denying Transfer. *See In re Federal Housing Finance Agency, et al., Preferred Stock Purchase Agreements Third Amendment Litigation, MDL No. 2713.*

5. On June 8, 2016, the Court lifted the stay and reopened the case (Doc. 14).

6. On June 13, 2016, FHFA filed its Renewed Motion to Substitute as Plaintiff and Incorporated Memorandum of Law in this case (Doc. 15) (the “Motion”).

7. Plaintiffs’ response to the Motion is currently due on June 30, 2016. Plaintiffs request an enlargement of time to respond to and including August 1, 2016. As a result of the delay caused by the MDL proceedings and other commitments, Plaintiffs need the enlargement of time to respond.

8. This motion is made in good faith and not for the purpose of delay. Neither FHFA nor Defendant will be prejudiced by the requested extension.

9. Rule 6(b), Federal Rules of Civil Procedure, vests the Court with the discretion to enlarge for good cause. Based on the foregoing, cause exists to justify the exercise of this Court’s discretion to grant this unopposed motion. A proposed order is attached hereto.

Rule 7.1(a)(3) Certificate

Pursuant to Rule 7.1(a)(3), counsel for Plaintiffs conferred with counsel for FHFA and counsel for Defendant, who do not oppose the relief requested in the motion.

WHEREFORE, Plaintiffs respectfully move this Court for an enlargement of time to and including August 1, 2016 to respond to FHFA’s Motion and for such further relief the Court deems just and proper.

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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on June 24, 2016, we electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will send transmissions of Notices of Electronic Filing on All Counsel of Record: **Steven W. Thomas, Esq.**, Thomas, Alexander, Forrester & Sorensen LLP [steventhomas@tafsattorneys.com]; **Hector J. Lombana, Esq.**, Gamba, Lombana & Herrera, P.A. [hlombana@glhlawyers.com]; **Peter Prieto, Esq., Matthew Weinshall, Esq.**, Podhurst Orseck P.A. [pprieto@podhurst.com; mweinshall@podhurst.com]; **Samuel J. Dubbin, Esq.**, Dubbin & Kravetz, LLP [sdubbin@dubbinkravetz.com]; and to **Howard N. Cayne, Esq.**, Arnold & Porter LLP [howard.cayne@porter.com].

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**ORDER GRANTING PLAINTIFFS' UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO RESPOND TO FHFA'S
RENEWED MOTION TO SUBSTITUTE AS PLAINTIFF**

Upon consideration of the Plaintiffs' Unopposed Motion for Enlargement of Time to Respond to FHFA's Renewed Motion to Substitute as Plaintiff, it is hereby ORDERED that the motion is GRANTED. Plaintiffs' response to FHFA's Motion is due on or before August 1, 2016.

Dated this _____ day of June, 2016.

Robert N. Scola, Jr.
United States District Judge