

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

ANTHONY R. EDWARDS, *et al.*,

Plaintiffs,

v.

DELOITTE & TOUCHE, LLP,

Defendant.

No. 1:16-cv-21221-RNS

**THE FEDERAL HOUSING FINANCE AGENCY'S UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE REPLY MEMORANDUM**

The Federal Housing Finance Agency ("FHFA" or the "Conservator"), as Conservator of the Federal National Mortgage Association ("Fannie Mae"), hereby moves pursuant to Fed.R.Civ.P. 6(b) and Local General Rule 7.1(c) for an enlargement of time, to and including August 29, 2016, to file its Reply to the Plaintiffs' Response in Opposition to FHFA's Renewed Motion to Substitute as Plaintiff. The grounds for this motion are as follows:

1. This is an action by private shareholders of the Federal National Mortgage Association (Fannie Mae) against Deloitte and Touche, LLP, for its alleged actions as Fannie Mae's auditor during the financial crisis of 2008. FHFA filed a Motion to Substitute as Plaintiff based on its role as Conservator for Fannie Mae under the Housing and Economic Recovery Act of 2008 ("HERA"), Pub.L.No.110-289, 122 Stat. 2654 (July 30, 2008) and joined Defendant's Motion to Stay Pending Action by the Judicial Panel on Multidistrict Litigation on April 12, 2016. (Doc. 7, 9). This Court entered a stay on April 13, 2016 (Doc. 12), and lifted the stay and reopened the case on June 8, 2016, after the MDL Panel denied Defendant's Motion to Transfer (Doc. 14).

2. After this Court reopened this case on June 8, 2016, FHFA filed its renewed Motion to Substitute as Plaintiff and Supporting Memorandum of Law on June 13, 2016 (“Motion to Substitute”). (Doc. 15). Plaintiffs, Anthony R. Edwards, et al, requested an extension of time of thirty (30) days to file its Response, which FHFA did not oppose. (Doc. 16). This Court granted Plaintiffs’ motion, and Plaintiffs filed their Response on August 1, 2016. (Doc. 17). Pursuant to Local General Rule 7.1(c)(1), FHFA’s Reply Memorandum is currently due August 11, 2016.

3. FHFA’s Motion to Substitute, and Plaintiff’s Response, raise important issues about the application of laws enacted by Congress to deal with the most serious economic crisis in generations. FHFA’s Motion and Plaintiffs’ Response cover several areas of federal statutory and regulatory law. Given the importance of the issues raised, FHFA respectfully requests an enlargement of time to and including August 29, 2016, to prepare and file its Reply Memorandum.

4. This motion is made in good faith and not for purposes of delay, and no party will be prejudiced by the requested enlargement of time.

5. Pursuant to Fed.R.Civ.P. 6(b) and Local General Rule 7.1(a)(J), this Court is authorized to grant the requested enlargement of time based on the good cause shown herein.

LOCAL RULE 7.1(a)(3) CERTIFICATION

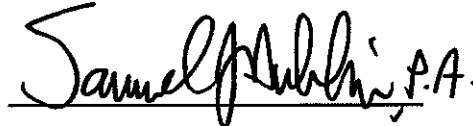
The undersigned certifies that counsel for the movant FHFA has conferred with counsel for Plaintiffs, who do not oppose the requested enlargement of time.

WHEREFORE, the Federal Housing Finance Agency (FHFA) respectfully moves for an enlargement of time to and including August 29, 2016, to file its Reply Memorandum pursuant to Local General Rule 7.1(c). Pursuant to Local General Rule 7.1(a)(2), a proposed order is filed

herewith and will be submitted via email to the Court as prescribed by Section 3I(6) of the CM/ECF Administrative Procedures.

Dated: August 2, 2016

Respectfully submitted,

A handwritten signature in black ink that reads "Samuel J. Dubbin, P.A." with a horizontal line underneath the name.

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CERTIFICATE OF SERVICE

The undersigned certifies that, on August 2, 2016, a true and correct copy of the foregoing was filed electronically using the Court’s CM/ECF system, and served via e-mail to:

<p>Steven W. Thomas steventhomas@tafattorneys.com THOMAS, ALEXANDER & FORRESTER LLP 14 27th Avenue Venice, CA 90291 Telephone: 310.961.2536 Facsimile: 310.526.6852</p>	<p>Peter Prieto pprieto@podhurst.com Matthew Weinshall Email: MWeinshall@podhurst.com PODHURST ORSECK P.A. 25 West Flagler Street, Suite 800 Miami, FL 33130 Telephone: (305) 358-2800 Facsimile: (305) 358-2382</p>
<p>Hector Lombana hlombana@ghlawyers.com GAMBIA & LOMBANA, P.A. 2701 Ponce de Leon Boulevard Mezzanine Coral Gables, FL 33134 Telephone: 305.448.4010 Facsimile: 305.448.9891</p>	<p>Miles Ruthberg, Esq. Email: miles.ruthberg@lw.com LATHAM & WATKINS LLP 885 Third Avenue New York, NY 10022-4834 Telephone: (212) 906-1200 Facsimile: (212) 751-4864</p>
<p>Gonzalo R. Dorta grd@dortalaw.com GONZALO R. DORTA, P.A. 334 Minorca Avenue Coral Gables, FL 33134 Telephone: 305.441.2299 Facsimile: 305.441.8849</p>	<p>Peter A. Wald, Esq. Email: peter.wald@lw.com LATHAM & WATKINS LLP 505 Montgomery Street, Suite 2000 San Francisco, CA 94111-6538 Telephone: (415) 395-0600 Facsimile: (415) 395-8095 <i>Counsel for Defendant Deloitte & Touche LLP</i></p>
<p>Brad F. Barrios Kenneth George Turkel Brad.Barrios@bajocuva.com kturkel@bajocuva.com 100 N. Tampa Street, Suite 1900 Tampa, Florida 33602 Telephone: 813-443-2199 Facsimile: 813-443-2193 <i>Counsel for Plaintiffs</i></p>	

/s/ Samuel J. Dubbin, P.A.

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No. 1:16-cv-21221-RNS

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Defendant.

**PROPOSED ORDER GRANTING FEDERAL HOUSING FINANCE AGENCY'S
UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE REPLY
MEMORANDUM**

THIS CAUSE came on before the Court on the Unopposed Motion of the Federal Housing Finance Agency ("FHFA"), pursuant to Fed.R.Civ.P. 6(b) and Local General Rule 7.1(c), for an enlargement of time to file its Reply to the Plaintiffs' Response in Opposition to FHFA's Renewed Motion to Substitute as Plaintiff. FHFA requests an enlargement of time to file its Reply to and including August 29, 2016. Upon review of the Motion and the record herein, and for good cause shown, it is hereupon ORDERED AND ADJUDGED that FHFA's Motion for Enlargement of time be, and the same is, hereby GRANTED. FHFA shall have an enlargement of time to and including August 29, 2016, to file its Reply Memorandum under Local General Rule 7.1(c).

DONE AND ORDERED in Chambers at the United States Courthouse, Miami, Florida,
this ___ day of August, 2016.

ROBERT N. SCOLA, JR.
UNITED STATES DISTRICT JUDGE