

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

<hr/>)	
FAIRHOLME FUNDS, INC., <i>et al.</i> ,))	
))	
))	No. 13-465C
Plaintiffs,))	(Judge Sweeney)
))	
v.))	
))	
THE UNITED STATES,))	
))	
))	
Defendant.))	
<hr/>)	

FEDERAL HOME LOAN MORTGAGE CORPORATION, FEDERAL NATIONAL MORTGAGE ASSOCIATION, PRICEWATERHOUSECOOPERS, AND DELOITTE & TOUCHE LLP’S UNOPPOSED MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFFS’ MOTIONS TO REMOVE THE “PROTECTED INFORMATION” DESIGNATION FROM CERTAIN DOCUMENTS

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims, nonparties Federal Home Loan Mortgage Corporation (“Freddie Mac”), Federal National Mortgage Association (“Fannie Mae”), PricewaterhouseCoopers (“PwC”) (Freddie Mac’s auditor), and Deloitte & Touche LLP (“Deloitte”) (Fannie Mae’s auditor) (collectively, “Respondents”) respectfully request a 14-day enlargement of time, to and including July 27, 2015, within which to file their responses to Plaintiffs’ four separate June 26, 2015 motions to remove the “Protected Information” designation from certain Freddie Mac, Fannie Mae, PwC, and Deloitte documents (collectively, the “De-Designation Motions”). Freddie Mac, Fannie Mae, PwC, and Deloitte’s responses are currently due on July 13, 2015. This is the first request for an enlargement of time for this purpose, and Plaintiffs consent to the relief sought by this

motion on the condition that Respondents not seek an additional extension (absent unforeseen circumstances), a condition Respondents accepted.¹

There is good cause for an enlargement of time. Given Freddie Mac's significant efforts to prepare for the deposition of former Freddie Mac Chief Financial Officer, Ross Kari, which took place on July 10, 2015, in Eugene, Oregon, and Fannie Mae's significant efforts to prepare for the deposition of former Fannie Mae Chief Financial Officer, Susan MacFarland, which is scheduled for July 15, 2015, in Houston, Texas, an enlargement of time is needed to meaningfully and appropriately respond to the De-Designation Motions. As noted above, Plaintiffs have consented to these extensions, and the Court already permitted Plaintiffs to file the documents that are the subject of the De-Designation Motions under seal in *Fairholme Funds, Inc. v. The Federal Housing Finance Agency*, No. 14-5254 (D.C. Cir.).

For these reasons, we request that the Court extend the deadline for Freddie Mac, Fannie Mae, PwC, and Deloitte to respond to the De-Designation Motions by 14 days, to July 27, 2015.

See fn. 1.

Respectfully submitted, this the 13th day of July 2015.

/s/ Michael J. Ciatti

Graciela M. Rodriguez
Michael J. Ciatti
KING & SPALDING LLP
1700 Pennsylvania Avenue NW, Ste. 200
Washington, DC 20006
Tel: (202) 737 0500
Fax: (202) 626 3737

*Counsel for Federal Home Loan
Mortgage Corporation*

¹ At the time Respondents accepted Plaintiffs' condition, they did not know that the Government and Grant Thornton were going to seek an extension until August 17, 2015, to respond to the de-designation motions pending as to them. To the extent the Court grants the Government and Grant Thornton until August 17, 2015, judicial economy would support extending Respondents' deadline until August 17, 2015.

/s/ H. Christopher Bartolomucci

H. Christopher Bartolomucci
BANCROFT PLLC
500 New Jersey Avenue NW, 7th Floor
Washington, DC 20001
Tel: (202) 234-0090
Fax: (202) 234-2806

*Counsel for Federal National Mortgage
Association*

/s/ Matthew D. Schnall

Matthew D. Schnall
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109 USA
Tel: (617) 526 6892
Fax: (617) 526 5000

Counsel for PricewaterhouseCoopers

/s/ Adam M. Studner

Adam M. Studner
PAUL, WEISS, RIFKIND, WHARTON
& GARRISON LLP
2001 K Street, NW
Washington, DC 20006
Tel: (202) 223 7300
Fax: (202) 223 7420

Counsel for Deloitte & Touche LLP