



**SUPPLEMENTAL INFORMATION PURSUANT TO
RULE 3(a) OF THE RULES OF THE COURT OF CHANCERY**

The information contained herein is for the use by the Court for statistical and administrative purposes only. Nothing stated herein shall be deemed an admission by or binding upon any party.

1. Caption of Case: *Timothy J. Pagliara v. Federal National Mortgage Association*
2. Date filed: **March 14, 2016**
3. Name and address of counsel for plaintiffs:
C. Barr Flinn (No. 4092)
Emily V. Burton (No. 5142)
Lakshmi A. Muthu (No. 5786)
Benjamin M. Potts (No. 6007)
Meryem Y. Dede (No. 6148)
Young Conaway Stargatt & Taylor, LLP
1000 North King Street
Wilmington, DE 19801
4. Short statement and nature of claim asserted: **This is an action for inspection of books and records pursuant to 8 Del. C. § 220.**
5. Substantive field of law involved (check one):

<input type="checkbox"/> Administrative law	<input type="checkbox"/> Labor Law	<input type="checkbox"/> Trusts, Wills and Estates
<input type="checkbox"/> Commercial law	<input type="checkbox"/> Real Property	<input type="checkbox"/> Consent trust petitions
<input type="checkbox"/> Constitutional law	<input type="checkbox"/> 348 Deed Restriction	<input type="checkbox"/> Partition
<input checked="" type="checkbox"/> Corporation law	<input type="checkbox"/> Zoning	<input type="checkbox"/> Rapid Arbitration (Rules 96, 97)
<input type="checkbox"/> Trade secrets/trademark/or other intellectual property	<input type="checkbox"/> Other	
6. Related case, including any Register of Wills matters (this requires copies of all documents in this matter to be filed with the Register of Wills: **n/a**
7. Basis of court's jurisdiction (including the citation of any statute conferring jurisdiction):
8 Del. C. § 220
8. If the complaint seeks preliminary equitable relief, state the specific preliminary relief sought: **n/a**
9. If the complaint seeks a TRO, summary proceedings, a preliminary injunction or expedited proceedings, check here .
(If #9 is checked, a Motion to Expedite must accompany the transaction.)
10. If the complaint is one that in the opinion of counsel should not be assigned to a Master in the first instance, check here and attach a statement of good cause: .

/s/ Lakshmi A. Muthu
Lakshmi A. Muthu (No. 5786)

COUNSEL'S STATEMENT OF GOOD CAUSE

It is the opinion of the undersigned counsel for the plaintiff that this action should not be assigned to a Master in the first instance. This matter concerns suspected ongoing misconduct by the board of directors of a corporation governed by Delaware law, resulting in billions of dollars of damages quarterly. Therefore, prompt inspection of books and records pursuant to 8 *Del. C.* § 220 is necessary. Accordingly, this matter will require a final decision on an expedited timetable and should proceed directly before the Chancellor or a Vice Chancellor.

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ C. Barr Flinn

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Lakshmi A. Muthu (No. 5786)
Benjamin M. Potts (No. 6007)
Meryem Y. Dede (No. 6148)
Rodney Square
1000 North King Street
Wilmington, DE 19801-0391
Telephone: (302) 571-6692
Facsimile: (302) 576-3292

Dated: March 14, 2016

Attorneys for Plaintiff
Timothy J. Pagliara