

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TIMOTHY J. PAGLIARA,

Plaintiff,

v.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION,

Defendant.

C.A. No. 16-193-GMS

STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME

WHEREAS, on March 14, 2016, stockholder Timothy J. Pagliara (the “Stockholder”) filed an action in the Delaware Court of Chancery (“Chancery Action”) pursuant to section 220 of the Delaware General Corporation Law (“Section 220”) seeking to inspect books and records of defendant Federal National Mortgage Association (“Defendant”);

WHEREAS, on March 25, 2016, Defendant filed a Notice of Removal Pursuant to 28 U.S.C. §§ 1331, 1441(a), 1446 removing the Chancery Action to the United States District Court for the District of Delaware (D.I. 1);

WHEREAS, on August 1, 2016, the Stockholder filed a motion to remand the above-captioned action to the Delaware Court of Chancery (“Motion to Remand”) (D.I. 10);

WHEREAS, on August 18, 2016, Defendant filed a response brief opposing the Stockholder’s Motion to Remand (“Defendant Opposition”) (D.I. 17);

WHEREAS, on August 18, 2016, the Federal Housing Finance Agency, a non-party which has moved to substitute itself as plaintiff in this action, also filed a response brief opposing the Stockholder’s Motion to Remand (“FHFA Opposition”) (D.I. 16);

WHEREAS, the Stockholder must reply to both Defendant and FHFA's Oppositions, and therefore requires additional time to complete his reply briefs in further support of his Motion to Remand;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the deadline for the Stockholder to file his reply to Defendant's Opposition (D.I. 17) and in further support of his Motion to Remand is extended through and including September 1, 2016.

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Dated: August 24, 2016