

**UNITED STATES DISTRICT COURT  
FOR THE NORTHER DISTRICT OF ILLINOIS**

CHRISTOPHER ROBERTS, and THOMAS  
P. FISCHER,

Plaintiffs,

v.

THE FEDERAL HOUSING FINANCE  
AGENCY, in its capacity as Conservator of  
the Federal National Mortgage Association  
and the Federal Home Loan Mortgage  
Corporation, MELVIN L. WATT, in his  
official capacity as Director of the Federal  
Housing Finance Agency, JACOB J. LEW,  
in his official capacity as Secretary of the  
Treasury, and THE DEPARTMENT OF  
THE TREASURY,

Defendants.

Civil Action No. 1:16-CV-02107

Honorable Edmond E. Chang

**PLAINTIFFS' UNOPPOSED MOTION TO UNSEAL  
PLAINTIFFS' AMENDED COMPLAINT**

Plaintiffs, Christopher Roberts and Thomas P. Fischer, hereby move for entry of an order unsealing Plaintiffs' Amended Complaint for Declaratory and Injunctive Relief, and in support thereof, state as follows:

1. On April 8, 2016, this Court entered a docket entry granting Plaintiffs' motion for leave to file their Amended Complaint under seal, in light of a protective order issued by the Court of Federal Claims in *Fairholme Funds, Inc. v. United States*, 13-465. Dkt. #33.
2. The protective order designated certain documents produced by the parties in *Fairholme* as "protected information", and the Plaintiffs' Amended Complaint here contained certain information that was initially designated "protected information".

3. Accordingly, Plaintiffs' Amended Complaint for Declaratory and Injunctive Relief was filed under seal. Dkt. #22.

4. However, since the filing of the Amended Complaint, the "protected information" designation has been removed from the information referenced in the Amended Complaint that was previously subject to the *Fairholme* protective order, and therefore, there is no longer any reason to maintain the Amended Complaint under seal.

5. For similar reasons, the amended complaints in *Robinson v. The Federal Housing Finance Agency, et al.*, Case No. 7:15-cv-000109 and *Saxton v. The Federal Housing Finance Agency, et al.*, Case No. 1:15-cv-00047, which contain factual allegations similar those in the Amended Complaint here, were recently unsealed. *Robinson v. The Federal Housing Finance Agency, et al.*, Case No. 7:15-cv-000109 (E.D. Kentucky, May 25, 2016) ECF No. 48; *Saxton v. The Federal Housing Finance Agency, et al.*, Case No. 1:15-cv-00047 (N.D. Iowa, June 24, 2016) ECF No. 85.

6. The undersigned has consulted with Defendants' counsel about this motion, and all Defendants consent to it. The undersigned has also consulted with counsel for the parties who produced the information at issue in the *Fairholme* case, and they likewise consent to the unsealing of the Amended Complaint.

WHEREFORE, Plaintiffs respectfully request that their motion be granted and that their Amended Complaint be unsealed.

Dated: July 29, 2016

Respectfully submitted,

/s/ Christian D. Ambler

Christian D. Ambler

STONE & JOHNSON, CHTD.

111 West Washington St.

Suite 1800

Chicago, Illinois 60602

Telephone: (312) 332-5656

Facsimile: (312) 332-5858

[cambler@stonejohnsonlaw.com](mailto:cambler@stonejohnsonlaw.com)

*Attorney for Plaintiffs Christopher*

*Roberts and Thomas Fischer*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of July, 2016, I caused a true and correct copy of the foregoing to be filed electronically using the Court's CM/ECF system, causing a true and correct copy to be served on all counsel of record.

/s/ Christian D. Ambler  
Christian D Ambler