

IN THE UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT

ARNETIA JOYCE ROBINSON

Plaintiff-Appellant

v.

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; DEPARTMENT
OF THE TREASURY

Defendants-Appellees

No. 16-6680

(E.D. Ky. No. 7:15-cv-00109)

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINE
FOR FILING PLAINTIFF’S OPENING BRIEF**

Pursuant to 6 Cir. R. 26, Plaintiff-Appellant Arnetia Joyce Robinson (“Plaintiff”) respectfully moves for a 30-day extension of time within which to file her opening brief in this appeal. Plaintiff’s opening brief is currently due on January 11, 2017, and Plaintiff requests that the Court extend that deadline to February 10, 2017. In support of her motion, Plaintiff states as follows:

1. This case is an Administrative Procedure Act challenge to the “Net Worth Sweep”—a joint administrative action by FHFA and Treasury that expropriated the entire economic value of all privately owned stock issued by

Fannie Mae and Freddie Mac. To date, Treasury has received roughly \$125 billion from Fannie Mae and Freddie Mac that it would not have received but for the Net Worth Sweep.

2. The Court's ruling in this appeal will have important implications for the ownership and future operations of Fannie Mae and Freddie Mac. In addition, resolving the parties' dispute will require the Court to decide complex jurisdictional questions regarding the federal courts' authority to review the actions of a federal conservator.
3. After the district court ruled in favor of the Defendants, Plaintiff retained new appellate counsel. Plaintiff's appellate counsel has experience litigating similar matters, but adequately briefing the important and complex issues in this case will nevertheless require considerably more attorney time than the typical appeal. Due to the press of other business during the holiday schedule, Plaintiff's appellate counsel would benefit from an additional 30 days to prepare Plaintiff's opening brief.
4. This is Plaintiff's first request for an extension of time, and Defendants-Appellees do not oppose this motion.

Date: December 30, 2016

Of counsel:
David H. Thompson

Respectfully submitted,

/s/ Charles J. Cooper
Charles J. Cooper
Counsel of Record

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Attorneys for Plaintiff-Appellant Arnetia Joyce Robinson

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon all counsel of record on this 30th Day of December, 2016, via the Court's Electronic Case Filing system.

/s/ Charles J. Cooper
Charles J. Cooper