

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOSHUA J. ANGEL

Plaintiff,

v.

FEDERAL HOME LOAN MORTGAGE
CORPORATION, et al.,

Defendants.

Case No. 1:18-cv-01142-RCL

**CONSENT MOTION TO EXTEND DEADLINE FOR DEFENDANTS' REPLY IN
SUPPORT OF THEIR MOTION TO DISMISS**

Defendants respectfully move for a 14-day extension of their time to file their reply in support of their motion to dismiss. Plaintiff consents to the proposed extension. In support of this motion, Defendants state as follows:

1. Defendants moved to dismiss Plaintiff's Complaint on July 12, 2018.
2. Pursuant to a schedule set by a previous order of the Court dated June 27, 2018 (ECF No. 8), Plaintiff filed an Opposition to the Motion to Dismiss on September 10, 2018.
3. Pursuant to that same schedule, Defendants' Reply in support of their Motion to Dismiss is currently due on October 10, 2018.
4. On September 28, 2018, while Defendants were in the process of preparing their Reply, this Court issued an Opinion on a motion to dismiss in *Fairholme Funds, Inc. v. FHFA*, Civ. No. 13-1053, *Arrowood Indemnity Co. v. Federal National Mortgage Association*, Civ. No. 13-1439, and *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*, Misc. No. 13-1288. Those cases, like this one, involve claims by Enterprise shareholders challenging the Third Amendment.

5. Defendants are seeking to extend their Reply deadline by fourteen days to provide adequate time to assess the impact of the *Fairholme* opinion on the claims and dismissal arguments in this case and address the *Fairholme* opinion in their Reply.

6. Plaintiff has informed Defendants' counsel that he consents to a fourteen-day extension to the Reply deadline.

WHEREFORE, Defendants move, with Plaintiff's consent, to extend the deadline for their Reply by fourteen days to October 24, 2018. A proposed order is submitted with this motion.

Dated: October 3, 2018

Respectfully submitted,

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(by permission)
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