



**IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE**

TIMOTHY J. PAGLIARA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. _____
	)	
FEDERAL NATIONAL MORTGAGE	)	
ASSOCIATION,	)	
	)	
Defendant.	)	
	)	

**MOTION FOR EXPEDITED PROCEEDINGS**

Plaintiff Timothy J. Pagliara (“Plaintiff”) respectfully requests that this Court expedite the above-captioned action to proceed in summary fashion and schedule its trial for April or early May 2016.

By and through the Verified Complaint (“Complaint”) filed contemporaneously herewith pursuant to 8 *Del. C.* § 220 (“Section 220”), Plaintiff seeks an order from this Court permitting Plaintiff to inspect certain books and records of the Federal National Mortgage Association (“Fannie Mae”).

A proceeding pursuant to Section 220 is a summary proceeding. *See 8 Del. C.* § 220(c) (“The Court may summarily order the corporation to permit the stockholder to inspect the corporation’s stock ledger, an existing list of stockholders, and its other books and records, and to make copies or extracts therefrom[.]”).

The Court therefore should schedule the trial of the matter to take place within 45 to 60 days of the filing of the complaint. *See Sullivan v. Elcom Int'l, Inc.*, 2015 WL 881074, at p. 4 (Del. Ch. Jan. 15, 2015) (TRANSCRIPT) (“Generally speaking . . . we handle 220 cases on a summary basis. We do aim to have trials of those kind of cases within 60 days.”); *Forbes v. Consert, Inc., C.A. No. 8130-VCG*, at 16-17 (Del. Ch. Jan. 31, 2013) (TRANSCRIPT) (referencing “the normal 45 to 60 day standard” for Section 220 proceedings); *Lavi v. Wideawake Deathrow Entm’t, LLC*, 2011 WL 284986, at \*1 (Del. Ch. Jan. 18, 2011) (“Under our law, books and records actions are summary proceedings. What that means is that they are to be promptly tried. . . . [T]he case can be tried within two months of filing.”).

In light of the foregoing, Plaintiff respectfully requests that the Court enter an order in the form submitted.

Where a plaintiff files a complaint seeking a summary proceeding, the Supplemental Information Form Pursuant to Rule 3(a) of the Rules of the Court of Chancery requires that a motion to expedite accompany the complaint.

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*/s/ C. Barr Flinn*

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