

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TIMOTHY J. PAGLIARA,
Plaintiff,

v.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION,
Defendant.

C.A. No. 1:16-cv-00193

**NOTICE OF FILING WITH THE JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

Defendant Federal National Mortgage Association respectfully gives notice that its Conservator, the Federal Housing Finance Agency (“FHFA”), has advised the United States Judicial Panel on Multidistrict Litigation that this case is related to FHFA’s pending motion pursuant to 28 U.S.C. § 1407 to transfer for coordinated or consolidated pretrial proceedings several other lawsuits relating to the Third Amendment, and should therefore be transferred to that multidistrict litigation proceeding.

A copy of FHFA’s filing, along with attachments and exhibits thereto, with the exception of filings in this Court which are incorporated by reference, are attached as exhibits to this Notice.

1. Exhibit 1: Notice of Related Actions, *In Re: Federal Housing Finance Agency, et al., Preferred Stock Purchase Agreements Third Amendment Litigation*, MDL Docket No. 2713, ECF No. 9;
2. Exhibit 2: Schedule of Related Actions, *In Re: Federal Housing Finance Agency, et al., Preferred Stock Purchase Agreements Third Amendment Litigation*, MDL Docket No. 2713, ECF No. 9-1;

3. Exhibit 3: Notice of Removal Pursuant to 28 U.S.C. §§ 1331, 1441(a), 1446, *Pagliari v. Fed. Nat'l Mortg. Ass'n*, C.A. No. 1:16-cv-00193, D. Del., D.I. 1 (MDL No. 2713, ECF No. 9-2) (incorporated by reference);
4. Exhibit 4: Federal Home Loan Mortgage Corporation's Notice of Removal, *Pagliari v. Fed. Home Loan Mortg. Corp.*, C.A. No. 1:16-CV-337-JCC/JFA, E.D. Va. (MDL No. 2713 ECF No. 9-3);
5. Exhibit 5: Proof of Service, *In Re: Federal Housing Finance Agency, et al., Preferred Stock Purchase Agreements Third Amendment Litigation*, MDL Docket No. 2713, ECF No. 9-4;
6. Exhibit 6: Civil Docket Sheet and Complaint, *Pagliari v. Fed. Nat'l Mortg. Ass'n*, C.A. No. 1:16-cv-00193, D. Del., D.I. 1-4(MDL No. 2713 ECF No. 9-5) (incorporated by reference); and
7. Exhibit 7: Civil Docket Sheet and Complaint, *Pagliari v. Fed. Home Loan Mortg. Corp.*, C.A. No. 1:16-CV-337-JCC/JFA, E.D. Va. (MDL No. 2713 ECF No. 9-6).

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ S. Mark Hurd

S. Mark Hurd (#3297)
Zi-Xiang Shen (#6072)
1201 N. Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200

shurd@mnat.com

zshen@mnat.com

Attorneys for Defendant Federal National Mortgage Association

OF COUNSEL:

Jeffrey W. Kilduff
Michael Walsh
O'Melveny & Myers LLP
1625 Eye Street, N.W.
Washington, D.C. 20006-4001
(202) 383-5300
jkilduff@omm.com
mwalsh@omm.com

March 29, 2016