

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TIMOTHY J. PAGLIARA,

Plaintiff,

v.

FEDERAL NATIONAL MORTGAGE
ASSOCIATION,

Defendant.

C.A. No. 16-193-GMS

STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME

WHEREAS, on August 1, 2016, stockholder Timothy J. Pagliara (the “Stockholder”) filed a motion to remand the above-captioned action to the Delaware Court of Chancery (“Motion to Remand”) (D.I. 10);

WHEREAS, on August 18, 2016, Defendant filed a response brief opposing the Stockholder’s Motion to Remand (“Defendant’s Opposition”) (D.I. 17);

WHEREAS, on August 18, 2016, the Federal Housing Finance Agency (“FHFA”), a non-party which has moved to substitute itself as plaintiff in this action, also filed a response brief opposing the Stockholder’s Motion to Remand (“FHFA’s Opposition”) (D.I. 16);

WHEREAS, on September 1, 2016, the Stockholder filed a reply brief in support of his Motion to Remand and in response to Defendant’s Opposition (D.I. 22);

WHEREAS, on September 2, 2016, FHFA filed a supplemental motion to substitute itself as plaintiff in this action (“FHFA’s Supplemental Substitution Motion”) (D.I. 24);

WHEREAS, on September 6, 2016, the Stockholder filed a reply brief in support of his Motion to Remand and in response to FHFA’s Opposition (D.I. 27);

WHEREAS, the Stockholder was engaged in briefing on his Motion to Remand during the first portion of the time period prescribed for preparing his answering brief in opposition to FHFA's Supplemental Substitution Motion, and therefore requires additional time to complete his answering brief in opposition to FHFA's Supplemental Substitution Motion;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Court, that the deadline for the Stockholder to file his answering brief in opposition to FHFA's Supplemental Substitution Motion (D.I. 24) is extended through and including September 23, 2016.

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

RICHARDS, LAYTON & FINGER, PA

/s/ Adam W. Poff

C. Barr Flinn (No. 4092)
Adam W. Poff (No. 3990)
Lakshmi A. Muthu (No. 5786)
Gregory J. Brodzik (No. 5722)
Rodney Square
1000 N. King Street
Wilmington, DE 19801-0391
Telephone: (302) 571-6692
bflinn@ycst.com
apoff@ycst.com
lmuthu@ycst.com
gbrodzik@ycst.com

/s/ Robert C. Maddox

Robert J. Stearn, Jr. (No. 2915)
Robert C. Maddox (No. 5356)
920 North King Street
Wilmington, DE 19801
(302) 651-7700
stearn@rlf.com
maddox@rlf.com

*Attorneys for Federal Housing
Finance Agency*

*Attorneys for Plaintiff
Timothy J. Pagliara*

Dated: September 16, 2016