

## COVINGTON

BEIJING BRUSSELS LONDON NEW YORK  
SAN DIEGO SAN FRANCISCO SEOUL  
SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP  
The New York Times Building  
620 Eighth Avenue  
New York, NY 10018-1405  
T +1 212 841 1000

**Via ECF and Hand Delivery**

January 20, 2015

The Honorable Laura Taylor Swain  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Mortgage Resolution Servicing, LLC v. JPMorgan Chase Bank, N.A.*, Civ. A. No. 1:15-cv-00293 (LTS) (JCF)**


Dear Judge Swain:

Defendants to the above-referenced action respectfully request that the Court extend the time for Defendants to respond to Plaintiffs' First Amended Complaint ("FAC"). The FAC was filed in state court on December 26, 2014 and was removed to this Court on January 15, 2015. The current deadline for Defendants to respond to the FAC is January 22, 2015. *See* Fed. R. Civ. P. 81(c)(2)(C). This is Defendants' first request for an extension of time in this case, and no other pending deadlines will be affected by this request.

The FAC encompasses 238 paragraphs of allegations and sets forth 18 causes of action. In light of the length and complexity of the pleading, Defendants require additional time beyond that provided by the Federal Rules of Civil Procedure to prepare their response to the FAC. Accordingly, Defendants request that the Court extend the time for Defendants to respond to the FAC up to and including February 24, 2015. To the extent Defendants contemplate the filing of a motion to dismiss, the parties will complete the pre-motion communications required by section (A)(2)(b)(i) of the Court's Individual Practices prior to the new deadline for Defendants' response to the FAC.

The parties have conferred regarding this request, and Plaintiffs have consented thereto, provided that Defendants agree to allow Plaintiffs 60 days in which to file their opposition to any motion to dismiss. Defendants have consented to that request.

Respectfully submitted,

  
Michael C. Nicholson  
Counsel for Defendants

cc: Gary F. Eisenberg, Esq. (via email)