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June 17, 2015

**VIA ECF AND FACSIMILE: (212) 805-0206**

Hon. James C. Francis, U.S.M.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re: Mortgage Resolution Servicing, LLC v. JPMorgan Chase Bank, N.A., et al.**  
**Civil Action No. 15-CV-293 (LTS) (JCF)**

Dear Judge Francis:

We write on behalf of Plaintiffs, having entered our appearance on June 5, 2015 and submitted an unopposed motion to appear as Plaintiffs' counsel. Plaintiffs respectfully move pursuant to 1(e) of Your Honor's Individual Practice Rules for an Order: (a) extending Plaintiffs' time to respond to the Defendants' pending motion to transfer to July 9, 2015 and setting a briefing schedule with respect thereto; (b) permitting the filing of a Third Amended Complaint; (c) staying submission of any motion to dismiss with respect to the Third Amended Complaint until the transfer motion is decided; and (d) staying discovery until the motion to transfer is decided, except if such discovery is related to the transfer motion or an emergency situation exists. Defendants do not object to this motion provided that it is granted in its entirety.

There are two substantive motions pending before the Court: Defendants' motion to transfer venue, filed on May 22, 2015 (ECF Doc. No. 42); and their motion to dismiss, filed on May 14, 2015 (ECF Doc. No. 35). By text order dated June 1, 2015, the Court granted Plaintiffs' letter motion for an extension of Plaintiffs' time to answer the transfer motion to June 25, 2015 and extended Defendants' time to reply thereto to July 16, 2015. (ECF Doc. No. 49). Plaintiffs' opposition to the motion to dismiss is due July 17, 2015. There have been no other extension requests.

We believe that sequencing the motions in this fashion, with the Court addressing the Defendants' motion to dismiss only after the Defendants' transfer motion is decided, will promote judicial efficiency by ensuring that the Court does not consider a dismissal motion which, if the case were to be transferred, would more appropriately be decided by the transferee court.

As indicated, we have conferred with counsel for Defendants who do not oppose this motion provided that it is granted in its entirety. A proposed form of order is submitted herewith

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for Your Honor's consideration. If the proposed form of order is satisfactory to Your Honor, we respectfully request that it be entered.

We thank the Court for its consideration of this submission.

Yours sincerely,

/s/ Helen Davis Chaitman

Helen Davis Chaitman

HDC:leb

Encl.

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