IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CONSUMER FINANCIAL PROTECTION BUREAU,	:	
	:	C.A. No. 17-cv-1323-SB
Plaintiff,	:	
v.	:	
THE NATIONAL COLLEGIATE MASTER STUDENT LOAN TRUST et al.,	:	
Defendants.	:	

DEFENDANTS' AND INTERVENORS'
MOTION FOR CERTIFICATION AND STAY

Pursuant to 28 U.S.C. § 1292(b), Defendants and Intervenors[1] (together, "Movants") hereby move this Court for an order certifying for interlocutory appeal the Court's December 13, 2021 order denying Movants' motion to dismiss Plaintiff Consumer Financial Protection Bureau's amended complaint (D.I. 380), and for a stay of the above-captioned action pending resolution of the interlocutory appeal. This motion is based on the accompanying brief in support, all files, papers, and records in this action, and any such additional matters as may be judicially noticed or come before the Court in this matter.

WHEREFORE, for the foregoing reasons and as set forth in Movants' accompanying papers, Movants respectfully request that the Court grant this motion, certify the December 13, 2021 order for interlocutory appeal, and stay proceedings in this action pending resolution of the appeal.

[1] Intervenors refers to Ambac Assurance Corp.; Transworld Systems, Inc.; and Wilmington Trust Company. TSI joins in this motion for certification but only as to the Court's ruling on the "covered persons" issue.

DATED: December 23, 2021

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