IN THE UNITED STATES COURT
FOR THE DISTRICT OF DELAWARE

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| CONSUMER FINANCIAL PROTECTION BUREAU,<br><br>*Plaintiff*,<br><br>v.<br><br>NATIONAL COLLEGIATE MASTER STUDENT LOAN TRUST, *et al.*,<br><br>*Defendants*. | ) | Case No. 17-cv-01323-SB |

**STIPULATION AND ORDER CONTINUING ADJOURNMENT OF SCHEDULING ORDER DEADLINES AND CONTINUING TO HOLD IN ABEYANCE PLAINTIFF'S MOTION TO STRIKE INTERVENORS' ANSWERS**

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned counsel for all parties,[1] subject to the approval of the Court and for good cause shown, that (A) the deadlines set forth in the Joint Scheduling Order ("Scheduling Order"), Dkt. 412, shall be further adjourned until May 20, 2024; and (B) Plaintiff Consumer Financial Protection Bureau ("Bureau")'s Motion to Strike Answers of Intervening Parties ("Motion"), Dkt. 410, shall continue to be held in abeyance until May 20, 2024, based on the following:

1. On March 28, 2024, the Court issued a Scheduling Order that set deadlines for the litigation of this case but which adjourned those deadlines until April 22, 2024, to allow the parties to engage in settlement discussions. The Order directed the parties to submit an updated Scheduling Order by April 22, 2024, if the parties did not intend to continue

[1] By entering into this stipulation, no party waives its right to seek an additional stay pending further appellate proceedings, or to assert that the mandate must issue before jurisdiction is returned to this Court.

settlement discussions. On April 22, 2024, the parties informed the Court that they were engaged in substantive settlement discussions and sought additional time to continue those discussions. The Court issued an order that same day adjourning the Scheduling Order deadlines until May 6, 2024 ("Order Staying Deadlines"). Since the Court issued that order, the parties have continued to engage in substantive settlement discussions and believe it would be fruitful to continue those discussions. For these reasons, the parties seek another adjournment of the Scheduling Order deadlines until May 20, 2024.

2. On March 25, 2024, the Bureau moved the Court to strike all answers filed by intervenors in this action and to exclude intervenors from further participation in this litigation. Dkt. 410. On April 5, 2024, the Court issued an order that held the motion in abeyance, stating that the motion would be reinstated on April 22, 2024, if the parties did not seek a further stay or adjournment of the Scheduling Order deadlines. Dkt. 415. On April 22, 2024, the parties informed the Court that they were engaged in substantive settlement discussions and sought additional time to continue those discussions. The Court Order Staying Deadlines, issued that same day, continued to hold the Bureau's motion in abeyance until May 6, 2024. Since the court issued that order, the parties have continued to engage in substantive settlement discussions and believe it would be fruitful to continue those discussions. For these reasons, the parties request that the Court continue to hold the Bureau's motion in abeyance until May 20, 2024.

3. If the parties do not seek a further adjournment of the Scheduling Order deadlines by May 20, 2024,

a. they shall submit an updated Scheduling Order to the Court by that date that is consistent with the timelines set forth in the March 28, 2024 Scheduling Order; and

b. the Motion shall be deemed reinstated on that date, and any response(s) to the Motion shall be due on May 28, 2024.

Pursuant to District of Delaware Local Rule 16.4(b), the undersigned counsel certify that their clients have been sent a copy of this stipulation.

Dated: May 6, 2024

Respectfully submitted,

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It is **SO ORDERED**, this 7th day of May 2024.



UNITED STATES CIRCUIT JUDGE