IN THE UNITED STATES COURT
FOR THE DISTRICT OF DELAWARE

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

JOINT MOTION FOR ENTRY OF STIPULATED FINAL JUDGMENT AND ORDER

Plaintiff Consumer Financial Protection Bureau ("Bureau") and Defendants National Collegiate Master Student Loan Trust, National Collegiate Student Loan Trust 2003-1, National Collegiate Student Loan Trust 2004-1, National Collegiate Student Loan Trust 2004-2, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-2, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-1, National Collegiate Student Loan Trust 2006-2, National Collegiate Student Loan Trust 2006-3, National Collegiate Student Loan Trust 2006-4, National Collegiate Student Loan Trust 2007-1, National Collegiate Student Loan Trust 2007-2, National Collegiate Student Loan Trust 2007-3, National Collegiate Student Loan Trust 2007-4 (collectively, "Defendants") hereby jointly and respectfully request that this Court enter the attached proposed Stipulated Final Judgment and Order ("Proposed Order") resolving this matter. Defendants' joining of this Motion for Entry of Stipulated Final Judgment and Order is subject to the timing request set forth in Defendants' Response filed simultaneously with this Joint Motion.

Defendants have agreed to the terms and entry of the Proposed Order, without further adjudication of any issue of fact or law, to settle and resolve all matters in dispute arising from the conduct alleged in the First Amended Complaint (D.I. 362). Entry of the Proposed Order would be in the public interest.

Dated: January 16, 2025

Respectfully submitted,

Eric Halperin
Enforcement Director

Deborah Morris
Deputy Enforcement Director

/s/ Stephen Jacques
Stephen Jacques
stephen.jacques@cfpb.gov
202-435-7368
Tiffany Hardy
tiffany.hardy@cfpb.gov
202-435-9375
Joseph Lake
joseph.lake@cfpb.gov
202-893-8760

Enforcement Attorneys
CONSUMER FINANCIAL PROTECTION BUREAU
1700 G Street NW
Washington, DC 20552
Facsimile: 202-435-7722

Attorneys for Plaintiff
Consumer Financial Protection Bureau

/s/ Michael A. Weidinger
Michael A. Weidinger (No. 3330)
Megan Ix Brison
PINCKNEY, WEIDINGER,
URBAN & JOYCE, LLC
2 Mill Road, Suite 204
Wilmington, DE 19806
T: (302) 504-1528
F: (302) 442-7046
mweidinger@pwujlaw.com
mixbrison@pwujlaw.com

OF COUNSEL:
Joshua Kipnees
George A. LoBiondo
Peter W. Tomlinson
Jonah Wacholder
PATTERSON BELKNAP WEBB & TYLER
1133 Avenue of the Americas
New York, NY 10036

Attorneys for Defendants