UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 9:17-CV-80495-MARRA-MATTHEWMAN

CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

v.

OCWEN FINANCIAL CORPORATION; OCWEN MORTGAGE SERVICING, INC.; and OCWEN LOAN SERVICING, LLC

Defendants.

CASE NO. 9:17-CV-80496-MARRA-MATTHEWMAN

OFFICE OF THE ATTORNEY GENERAL, THE STATE OF FLORIDA, Department of Legal Affairs,

and

OFFICE OF FINANCIAL REGULATION, THE STATE OF FLORIDA, Division of Consumer Finance,

Plaintiffs,

v.

OCWEN FINANCIAL CORPORATION; OCWEN MORTGAGE SERVICING, INC.; and OCWEN LOAN SERVICING, LLC

Defendants.

JOINT MOTION FOR EXTENSION OF TIME TO FILE AMENDED COMPLAINT AND COMPLETE EXPERT DISCOVERY

1. Plaintiffs, the Consumer Financial Protection Bureau ("Bureau"), Office of the Attorney General of the State of Florida, and Office of Financial Regulation of the State of Florida (collectively "Florida AG and OFR"), and Defendants, Ocwen Financial Corporation, Ocwen Mortgage Servicing, Inc., and Ocwen Loan Servicing, LLC (collectively, "Ocwen") (collectively with the Bureau and Florida AG and OFR, "Parties"), pursuant to Local Rule 7.1 jointly request relief described below, for which there is good cause.

2. On June 6, 2019, the Court entered an Order Re-Setting Pretrial Deadlines, where it set deadlines for all parties regarding the submission of rebuttal expert reports, sur-rebuttal expert reports, and completion of all expert depositions. DE 398.

3. On September 5, 2019 the Court entered its Order Granting in Part and Denying in Part Defendants' Motion to Dismiss ("September 5 Order"). DE 452.

4. The Court stated in its September 5 Order that the Bureau "may file an Amended Complaint on or before September 27, 2019." DE 452 at 68.

5. On September 19, 2019, the Parties conferred about issues related to scheduling in this case. The Bureau and Defendants now jointly request that this Court enter an order: (a) extending the deadline for the Bureau's filing of an Amended Complaint; and (b) extending any deadline for the Defendants' filing of an answer to the Amended Complaint. The Bureau, Florida AG and OFR, and Defendants jointly request that this Court enter an order: (a) extending the deadline for rebuttal expert reports and disclosures; (b) extending the deadline for sur-rebuttal expert reports and disclosures; and (c) extending the deadline for conducting expert depositions. The current deadlines and deadlines agreed to among the Parties are as follows[1]:

[1] The Parties recognize they need to file an updated joint scheduling report following the Bureau's filing of an Amended Complaint. The Parties are currently working out remaining deadlines and plan to file their updated joint scheduling report within 20 days of the Bureau's filing of its Amended Complaint, as directed in the Court's September 5 Order. DE 452 at 68-69.

Event	Current Deadline	Agreed Deadline
Amended Complaint	September 27, 2019	October 4, 2019
Answer to Amended Complaint		21 days after the Bureau files its Amended Complaint
Rebuttal Expert Reports and Disclosures	September 30, 2019	October 15, 2019
Sur-rebuttal Expert Reports and Disclosures	October 15, 2019	November 14, 2019
Conducting Expert Depositions	November 4, 2019	December 13, 2019

6. Good cause supporting this Joint Motion includes the need for additional time to fully address the issues raised in the Court's September 5 Order in amending the complaint, and in completing expert discovery.

7. Neither the Parties nor the Court would suffer any prejudice as a result of the extensions.

8. This Joint Motion is made in good faith.

For the foregoing reasons, the Plaintiffs and Defendants jointly agree and respectfully request the Court extend the deadlines as follows:

Event	Deadline
Amended Complaint	October 4, 2019
Answer to Amended Complaint	21 days after the Bureau files its Amended Complaint
Rebuttal Expert Reports and Disclosures	October 15, 2019
Sur-rebuttal Expert Reports and Disclosures	November 14, 2019
Conducting Expert Depositions	December 13, 2019

Dated: September 24, 2019

Respectfully submitted,

Attorneys for Plaintiff,
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