UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. PENNSYLVANIA HIGHER EDUCATION ASSISTANCE AGENCY, et al., Defendants.	Case No. 1:24-cv-00756-JPW ELECTRONICALLY FILED

JOINT MOTION FOR MODIFICATION OF STIPULATED JUDGMENTS

Plaintiff the Consumer Financial Protection Bureau (the "CFPB"), Defendant Trusts,[1] Defendant Pennsylvania Higher Education Assistance Agency ("PHEAA"), and Intervenor Pacific Investment Management Company LLC ("PIMCO"), in its capacity as investment manager or adviser for certain investment vehicles (the "PIMCO-Managed Funds") that own notes issued by Defendant Trusts, jointly move the Court to modify the Stipulated Final Judgments and Orders ("Stipulated Judgments") against the Trusts, Dkt. No. 50, and PHEAA, Dkt. No. 51, pursuant to

[1] The Trusts are the National Collegiate Master Student Loan Trust I, National Collegiate Student Loan Trust ("NCSLT") 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1, NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4.

Federal Rule of Civil Procedure 60(b)(5). The grounds for this Motion are set forth in the accompanying Brief in Support.

Dated: December 2, 2025

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CERTIFICATE OF CONCURRENCE

In accordance with Local Rule 7.1, I hereby certify that the Trusts' counsel has contacted and sought concurrence from the other parties to this Action. The Consumer Financial Protection Bureau, Pacific Investment Management Company, and Pennsylvania Higher Education Assistance Agency concur with and join in this Motion.

Respectfully submitted,

/s/ John Wells
John Wells

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of December, 2025, I caused a copy of the foregoing document to be filed electronically using the Court's electronic filing system and served upon designated counsel of record for all parties in the above-captioned matter.

Respectfully submitted,

/s/ Scott D. Clements
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