

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

In re: Bank of America Home Affordable
Modification Program (HAMP) Contract
Litigation

Civil Action No. 1:10-md-02193-RWZ

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME
TO FILE A RESPONSE TO PLAINTIFFS' MOTION TO COMPEL**

Bank of America, N.A., for itself and as successor by merger to BAC Home Loans Servicing, LP ("Bank of America") submits this motion seeking an extension of time to respond to Plaintiffs' Motion to Compel ("Motion") [Docket # 126]. As grounds for this motion, Bank of America states as follows:

1. On July 23, 2012 Plaintiffs filed the Motion requesting an order compelling Bank of America to produce certain documents and electronic records.
2. Pursuant to Local Rule 7.1(b)(2), Defendant's response to Plaintiffs' Motion is due on August 6, 2012 .
3. In order to fully investigate and respond to the Motion, and to accommodate both travel and vacation schedules of counsel and client representatives, Defendant hereby moves to extend its time to respond to Plaintiffs' Motion by fourteen days, to and including August 20, 2012.
4. Plaintiffs do not oppose the requested relief.

WHEREFORE, Bank of America respectfully requests that the Court extend Defendant's time to respond to Plaintiffs' Motion to Compel until August 20, 2012.

Dated: July 31, 2012

Respectfully submitted,

Bank of America, N.A., for itself and as
successor by merger to BAC Home Loan
Servicing, L.P.,

By its attorneys,

/s/ James W. McGarry

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LOCAL RULE 7.1(a)(2) CERTIFICATION AND CERTIFICATE OF SERVICE

I certify pursuant to Local Rule 7.1(a)(2) that the moving party has conferred in good faith with interim co-lead counsel for Plaintiffs on the matter set forth herein and that such counsel does not oppose the relief sought in this motion.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on July 31, 2012.

/s/ James W. McGarry