

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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

No. 1:10-md-02193

**DEFENDANTS' ASSENTED-TO MOTION TO EXTEND TIME BY  
TEN DAYS TO RESPOND TO PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTIVE RELIEF**

Defendants Bank of America, N.A. and BAC Home Loans Servicing, L.P. hereby move, with Plaintiffs' assent, to extend by ten days the time by which they must respond to Plaintiffs' pending motion for preliminary injunctive relief. In support of this assented-to motion, Defendants state:

1. On April 5, 2011, Plaintiffs filed a motion for preliminary injunctive relief ("Plaintiffs' Motion").
2. Pursuant to Local Rule 7.1(b)(2), Defendants' response to Plaintiffs' Motion is due on April 19, 2011.
3. Plaintiffs' Motion contains declarations from thirty-eight different borrowers, necessitating extensive factual research on Defendants' part.
4. Defendants now move to extend their time to respond to Plaintiffs' Motion by ten days, to and including April 29, 2011.
5. Plaintiffs have assented to the requested relief.

WHEREFORE, Defendants respectfully request that the Court extend Defendants' time to respond to Plaintiffs' Motion by ten days from April 19 to April 29, 2011.

Dated: April 15, 2011

Respectfully submitted,

Bank of America, N.A. and BAC Home Loan  
Servicing, L.P.,

By their attorneys,

/s/ James W. McGarry

James W. McGarry (BBO #633726)

jmcgarry@goodwinprocter.com

Mark Tyler Knights (BBO #670991)

mknights@goodwinprocter.com

GOODWIN PROCTER LLP

Exchange Place

53 State Street

Boston, Massachusetts 02109

Tel.: 617.570.1000

Fax: 617.523.1231

**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 opposing counsel on the matter set forth herein and that opposing counsel has assented to the extension of time 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 April 15, 2011.

/s/ James W. McGarry