

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

IN RE BANK OF AMERICA HOME AFFORDABLE MODIFICATION PROGRAM (HAMP) CONTRACT LITIGATION))))))))))))	MDL NO. 2193 ASSENTED-TO MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT'S MOTION FOR A MORE DEFINITE STATEMENT Centralized before the Honorable Rya W. Zobel
This Document Relates To: All Actions		

Plaintiffs hereby respectfully move the Court to enlarge the time by which Plaintiffs may file their response to Defendant Bank of America’s Motion For A More Definite Statement, to and including September 26, 2011. In support of this motion, Plaintiffs state as follows:

1. On August 8, 2011, Plaintiffs filed a Second Amended Consolidated Class Action Complaint (Doc. No. 69).
2. On August 29, 2011, Bank of America filed a Motion For A More Definite Statement (“Motion”).
3. Plaintiffs’ Response to the Motion (“Response”) is currently due September 12, 2011.
4. Plaintiffs believe that there is potentially a means for resolving the issues raised in the Motion without resorting to full motion practice.
5. Plaintiffs’ and Defendant’s counsel have set a date to confer on the issues raised in Defendant’s Motion for September 16, 2011.
6. Accordingly, Plaintiffs propose a two-week enlargement of time for the Response.
7. Defendant’s Counsel has assented to such enlargement.

WHEREFORE, Plaintiffs respectfully request that the time by which the Plaintiffs may respond to the Defendant's Motion For A More Definite Statement be enlarged up to and including September 26, 2011.

Dated: September 9, 2011

Respectfully Submitted,

/s/ Gary Klein

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LOCAL RULE 7.1 CERTIFICATE

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 relief sought herein.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic File (NEF) and paper copies will be sent to those indicated as non-registered participants on September 9, 2011.

/s/ Gary Klein

Gary Klein