

REED SMITH LLP
A limited liability partnership formed in the State of Delaware

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14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF ARIZONA**

16 PHH MORTGAGE CORPORATION,

17 Plaintiff,

18 vs.

19 ARCH U.S. MI SERVICE, INC.,

20 Defendant.
21

Case No. 2:21 CV 01516

**STIPULATION TO EXTEND TIME
FOR FILING OF PLAINTIFF'S
RESPONSE TO DEFENDANT'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT; AND PROPOSED
ORDER**

22 Pursuant to LRCiv. 6.1 and 7.3, Plaintiff PHH Mortgage Corporation ("PHH"), by and
23 through its counsel undersigned, and Defendant Arch U.S. MI Services, Inc. ("Arch"), by and
24 through its counsel undersigned, and hereby request that the Court extend the deadline for
25 PHH to file its response to Arch's Motion for Partial Summary Judgment re Collateral
26

28 **STIPULATION TO EXTEND TIME FOR FILING OF PLAINTIFF'S RESPONSE
TO DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT; AND
PROPOSED ORDER**

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1 Estoppel (the “Collateral Estoppel Motion”) by two weeks from April 25, 2022 to May 9,
2 2022. This Joint Motion is based on the following:

3 1. This lawsuit involves 2,733 individual mortgage loans, each one of which was
4 covered by a policy of mortgage insurance issued by PMI Mortgage Insurance Company
5 (“PMI”). PHH (or its predecessor) submitted claims under each of those insurance policies,
6 which PMI then either denied or curtailed (paid a reduced amount).

7 2. On March 24, 2022, Arch filed its Collateral Estoppel Motion.

8 3. Due to scheduling conflicts, including work travel and planned vacation, PHH
9 requires an additional two weeks to file its Response to the Collateral Estoppel Motion.

10 4. This is PHH’s first request for an extension of time to respond to the Collateral
11 Estoppel Motion.

12 5. Arch does not oppose PHH’s request for a two week extension to file its
13 Response to the Collateral Estoppel Motion.

14 Based on the foregoing, the parties request that the Court enter an Order extending the
15 deadlines for PHH to file its Response to the Collateral Estoppel Motion from April 25, 2022
16 to May 9, 2022. A proposed form of Order is being lodged with the Court.

17 **DATED** this 14 day of April, 2022.

18 **REED SMITH LLP**

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