

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

Gerald Maltz (004908)
Stanley G. Feldman (000838)
Miller, Pitt, Feldman & McAnally, PC
One South Church Avenue, Suite 900
Tucson, AZ 85701
T: (520) 792-3836
F: (520) 624-5080
Email: sfeldman@mpfmlaw.com
gmaltz@mpfmlaw.com

David M. Halbreich (*pro hac vice pending*)
David E. Weiss (*pro hac vice pending*)
Matthew D. Rosso (*pro hac vice pending*)
Margaret McDonald (*pro hac vice pending*)
Reed Smith LLP
355 South Grand Avenue, Suite 2900
Los Angeles, CA 90071
T: (213) 457-8033
F: (213) 457-8080
Email: DHalbreich@ReedSmith.com
DWeiss@ReedSmith.com
MRosso@ReedSmith.com
MMcDonald@ReedSmith.com

Attorneys for PHH Mortgage Corporation

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

PHH MORTGAGE CORPORATION,

Plaintiff,

vs.

ARCH U.S. MI SERVICE, INC.,

Defendant.

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**

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

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

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**

19 By: /s/ David M. Halbreich
 20 Gerald Maltz (004908)
 21 Stanley G. Feldman (000838)
 22 **Miller, Pitt, Feldman & McAnally, PC**
 One South Church Avenue, Suite 900
 Tucson, AZ 85701

23 David M. Halbreich (*pro hac vice*)
 24 David E. Weiss (*pro hac vice*)
 25 Matthew D. Rosso (*pro hac vice*)
 Reed Smith LLP
 355 South Grand Avenue, Suite. 2900
 Los Angeles, CA 90071

26 *Attorneys for Plaintiff PHH Mortgage Corporation*

27 - - 2 - -

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

VAN COTT & TALAMANTE, PLLC

By: /s/ Ryan J. Talamante

Joyce N. Van Cott

Ryan J. Talamante

3030 North Third Street, Suite 790

Phoenix, Arizona 85012

Attorneys for Defendant Arch U.S. MI Service, Inc.