UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MARIALICE BATHRUS WILLIAMS,	
Plaintiff,	
v.	**Civil Action No. 05-cv-1483 (JDB)**
FANNIE MAE, et al.,	
Defendants.	

PLAINTIFF'S CONSENT MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Plaintiff Marialice Bathrus Williams, by and through counsel, hereby moves for an extension of time to Friday, September 21, 2007, for filing her Opposition to the Defendants' Motion for Summary Judgment in this proceeding. This motion has been discussed with counsel for the Defendants, and consent therefore has been given.

In support hereof, the following information is provided:

1. Defendants filed their Motion for Summary Judgment with the Court on June 21, 2007. The deadline for the filing of Plaintiff's Opposition currently is established as no later than July 23, 2007, as set by the Court's Minute Order entered December 15, 2006.

2. Plaintiff and Plaintiff's counsel have been substantially and materially delayed in preparing the Opposition because of the sudden death of case co-counsel Harley J. Daniels, Esq., on June 26, 2007. Prior to his death, Mr. Daniels had assumed the primary

counsel role for Plaintiff, and he has been critically involved in all phases of this proceeding.

3. Moreover, the two remaining counsel for Plaintiff in this case are significantly involved in Mr. Daniels' Estate, which includes provision of care and guardianship of a minor child, and a number of other complicating issues. Mr. Beasley is the named Personal Representative of the Estate, and Mr. Lederer is the attorney for the Estate. Mr. Beasley and Mr. Lederer also are each involved in several other ongoing Federal and State Court proceedings.

4. For all of these reasons, Plaintiff and counsel will require a period of approximately two additional months to complete the Opposition filing.

5. The original schedule for the filing of Defendants' Reply was set for three weeks following the filing of Plaintiff's Opposition (pursuant to the Court's Minute Order of December 15, 2006). If this period is maintained following the proposed revised date for the filing of Plaintiff's Opposition (*i.e.* September 21, 2007), the Reply would be due not later than October 12, 2007. The parties propose that this be the revised date for the reply submission, should this motion be granted.

A proposed Order is provided herewith for the Court's consideration.

Respectfully submitted,

/s/ *Michael W. Beasley*

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Attorney for Plaintiff Marialice B. Williams

Attachment 1: Proposed Order

CERTIFICATE OF SERVICE

I hereby certify that one copy of the foregoing "Plaintiff's Consent Motion for Extension of Time to Respond to Defendants' Motion for Summary Judgment," with proposed Order, has been served through the Court's ECF filing system to each of the following named counsel for Defendants, this 9th day of July, 2007:

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