

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS

IN THE MATTER OF:

RICHARD P. LOTFY  
SHARI D. LOTFY,  
Debtors

CHAPTER 13  
CASE NO. 08-40106

RICHARD P. LOTFY  
SHARI D. LOTFY,  
Plaintiffs

v.

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS, INC.

and

INDYMAC BANK, FSB  
Defendant

ADVERSARY PROCEEDING  
CASE NO. 08-04071

**JOINT MOTION TO EXTEND DISCOVERY DEADLINE**

NOW COME Richard P. Lotfy and Shari D. Lotfy, Plaintiffs, and IndyMac Bank, FSB, Defendant, and jointly move the Court to extend the discovery deadline currently scheduled for January 15, 2009 to April 15, 2009.

In support thereof, parties states they are actively engaged in discovery but are unable to complete it by the current deadline.

Respectfully Submitted:

Richard P. Lotfy,  
Shari D. Lotfy, defendants  
By their Attorney,

IndyMac Bank, FSB  
By its Attorney

/s/ Rosaleen J. Clayton  
Rosaleen J. Clayton, Esq. BBO # 652132  
Clayton Law Offices  
319A Southbridge Street  
Auburn, MA 01501  
Tel: (508) 832-9006  
Fax: (508) 832-9112

/s/ John T. Precobb  
John T. Precobb, Esq. BBO #561931  
Orlans Morans PLLC  
45 School Street  
Boston, MA 02108  
(617) 502-4116  
(617) 502-4101