

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
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1/16/09. Allowed. No further extensions will be allowed. May 15, 2009. Any dispositive motions shall be filed no later than May 5, 2009. Joint Recital Memorandum by

1/15/09