

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 FOR APPROVAL OF STATEMENT PURSUANT TO RULE 7026(f)

NOW COME Richard P. Lotfy and Shari D. Lotfy, Plaintiffs, and IndyMac Bank, FSB, Defendant, and jointly move the Court for approval of the attached statement pursuant to FRBP 7026(f) and the discovery plan therein.

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 #
Orlans Morans PLLC
45 School Street
Boston, MA 02108
(617) 502-4116
(617) 502-4101