

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ANIL KANCHARLA, et al.,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No.:
	§	
FEDERAL NATIONAL	§	1:25-CV-02346-RDM
MORTGAGE ASSOCIATION,	§	
	§	
Defendant.	§	

**FEDERAL NATIONAL MORTGAGE ASSOCIATION’S
SECOND UNOPPOSED MOTION TO EXTEND
TIME TO FILE A RESPONSE TO PLAINTIFFS’ COMPLAINT**

Subject to and without waiving its right to seek to compel arbitration or to assert any other motions or defenses, Federal National Mortgage Association (“Defendant”) respectfully files this Second Unopposed Motion to Extend Time to File a Response to Plaintiffs’ Complaint (“Second Motion to Extend”), asking the Court to extend its time to respond by one week.

I. REQUEST FOR EXTENSION OF TIME

1. Plaintiff Anil Kancharla and sixty-four other individual Plaintiffs (“the Kancharla Plaintiffs”) commenced this action on July 21, 2025, by filing the document titled, “Complaint for Employment Discrimination” (the “Complaint”).

(ECF #1)

2. Defendant accepted service of the Complaint on July 29, 2025.

3. On August 19, 2025, this Court granted Defendant’s Motion for Extension of Time to File a Responsive Deadline (ECF #6), setting September 9,

2025 as Defendant's deadline to respond to the Complaint. This Second Motion to Extend is filed prior to that deadline.

4. As referenced in its first Motion to Extend, Defendant believes each of the Plaintiffs is subject to an agreement with the Defendant to resolve the disputes in the Complaint in arbitration. Defendant has diligently gathered documentation supporting these Agreements and recently provided Plaintiffs with additional information for their consideration.

5. Pursuant to Federal Rule of Civil Procedure 6(b), the Court may, for good cause, extend the time to respond to the Complaint. There is good cause in this matter, as Plaintiffs and Defendant have been in discussions relating to the agreements to arbitrate which may resolve some or all of the issues related to the appropriate forum for this dispute, promoting efficient use of judicial resources. In addition, to the extent the issue is not fully resolved, Defendants require time to weigh and assess any other potential responsive filings.

6. Defendant therefore respectfully asks the Court to extend its time to file a response to Plaintiffs' Complaint by one additional week, with a new deadline of September 16, 2025.

7. Counsel for the Kancharla Plaintiffs, Milton Johns, does not oppose the request for extension.

8. Defendant does not make this request for unnecessary delay, but for good cause – to allow sufficient time for the parties to work through the arbitration issue and for Defendant to explore any additional potential defenses in this case.

II. CONCLUSION

For the reasons set forth above, Defendant respectfully asks that the Court extend its time to serve a responsive pleading to Plaintiff's Complaint by one week, to September 16, 2025. Defendant further requests any additional relief to which the Court finds it is entitled.

Respectfully submitted,

/s/ Ken Carroll

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***Attorneys for Defendant Federal
National Mortgage Association
("Fannie Mae")***

CERTIFICATE OF CONFERENCE

I certify that on September 3 and 4, 2025, I communicated with counsel for Plaintiffs, Milton Johns, regarding the subject matter of this Motion. Mr. Johns indicated that he did not oppose the Motion.

/s/ Angelina LaPenotiere
Angelina LaPenotiere

CERTIFICATE OF SERVICE

I certify that on September 4, 2025, I served the Kancharla Plaintiffs, through their attorney, Milton Johns, with a copy of this document, Federal National Mortgage Association's Second Unopposed Motion to Extend Time to Respond to Complaint, via this Court's ECF system.

/s/ Ken Carroll
Ken Carroll