

9575 Katy Freeway, Suite 300

Houston, TX 77024

Phone: 713-871-0005

Fax: 713-871-1358

Thomas E. Black, Jr., P. C. \*

Calvin C. Mann, Jr., P. C.

Gregory S. Graham, P. C.

David F. Dulock

Diane M. Gleason

Benjamin R. Idziak \*\*

Shawn P. Black \*\*

Margaret A. Noles

Robert J. Brewer

Regina Uhl

Of Counsel David M. Tritter

\* Also Licensed in New York, Washington, West Virginia and Iowa
\*\* Also Licensed in New York September 7, 2012

To: Clients

From: David F. Dulock

Subject: Proposed Rule Amending Regulation Z HOEPA Loan Coverage -Comment Period Extended By Consumer Financial Protection Bureau

On August 15, 2012, this firm issued a memorandum (click <u>here</u>) on the proposed rule to amend the HOEPA Loan Coverage in \$1026.32(a)(1)(i) and (b)(1)(i) of Regulation Z, which was published in the August 15, 2012 issue of the *Federal Register* by the Consumer Financial Protection Bureau (CFPB). The proposed rule's comment period for this amendment was originally stated to end on September 7, 2012. The CFPB has reconsidered and in yesterday's issue of the Federal Register (77 FR 54844) published a notice that it is extending the comment period for the proposed amendments to \$1026.32(a)(1)(i) and (b)(1)(i) to November 6, 2012.

You may submit comments, identified by Docket No. CFPB–2012–0028 or RIN 3170–AA19, by any of the following methods:

• *Electronic:* http://www.regulations.gov. Follow the instructions for submitting comments.

• *Mail/Hand Delivery/Courier:* Monica Jackson, Office of the Executive Secretary, Consumer Financial Protection Bureau, 1700 G Street NW., Washington, DC 20552.

All submissions must include the agency name and the above Docket Number or RIN.

Except for the above the comment period extension and method of submitting comments on the HOEPA amendments, all other statements in our August 15, 2012 memorandum remain unchanged.

This Memorandum is provided as general information in regard to the subject matter covered, but no representations or warranty of the accuracy or reliability of the content of this information are made or implied. Opinions expressed in this memorandum are those of the author alone. In publishing this information, neither the author nor the law firm of Black, Mann & Graham L.L.P. is engaged in rendering legal services. While this information concerns legal and regulatory matters, it is not legal advice and its use creates no attorney-client relationship or any other basis for reliance on the information. Readers should not place reliance on this information alone, but should seek independent legal advice regarding the law applicable to matters of interest or concern to them. The law firm of Black, Mann & Graham L.L.P. expressly disclaims any obligation to keep the content of this information current or free of errors.