IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. ACCESS FUNDING, LLC, ET AL., Defendants.	Case No. 1:16cv03759-JFM

PLAINTIFF'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE ITS OPPOSITION TO DEFENDANTS' MOTIONS FOR *BURFORD* ABSTENTION AND STAY OR DISMISSAL AND FOR AN EXTENSION OF TIME FOR DEFENDANTS TO FILE THEIR REPLIES

On January 30, 2017, Defendant Charles Smith filed a Motion to Dismiss, Defendant Michael Borkowski filed a Motion for *Burford* Extension and Stay or Dismissal, and Defendants Access Funding, LLC, Access Holding, LLC, Reliance Funding, LLC, Lee Jundanian, and Raffi Boghosian, together, filed a Motion for *Burford* Extension and Stay or Dismissal. The Bureau intends to file a response opposing the motions. Under Local Rule 105.2, the Bureau's response is due on Monday, February 13, 2017.

The Bureau requests a two-week extension to respond to Defendants' motions. The extension is necessary to permit the Bureau sufficient time to address all of the arguments in Defendants' motions in a consolidated opposition and because as a federal government agency, the approvals of several officials within the Bureau are necessary

prior to filing and at least one person from whom such approval is needed is out of the office and unavailable during the period before the current due date for the Bureau's opposition.

Before filing this motion, the Bureau consulted with counsel for all Defendants, who consent to a two-week extension. In addition, the Bureau consents to a two-week extension for Defendants' reply. Thus, the Bureau respectfully requests that the Court enter an order granting the Bureau leave to file its response to Defendants' motions by Monday, February 27, 2017 and granting Defendants leave to file their reply by March 27, 2017.

A proposed Order is attached hereto.

Respectfully Submitted,

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