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

CONSUMER FINANCIAL PROTECTION BUREAU	*	
Plaintiff,	*	
v.	*	Case No. 1:16cv03759-ELH
ACCESS FUNDING, LLC, et al.,	*	
Defendants.	*	

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DEFENDANTS' JOINT MOTION FOR PARTIAL SUMMARY JUDGMENT
AND REQUEST FOR HEARING

COME NOW, Defendants Access Funding, LLC ("Access Funding"), Access Holding, LLC ("Access Holding"), Reliance Funding, LLC ("Reliance Funding"), Lee Jundanian ("Jundanian"), Raffi Boghosian ("Boghosian"), Michael Borkowski ("Borkowski"), and Charles E. Smith ("Smith") (collectively, the "Defendants"), by counsel, and under Rule 56 of the Federal Rules of Civil Procedure, and submit this Joint Motion for Partial Summary Judgment. Defendants request summary judgment on Plaintiff's claims for monetary relief and other equitable relief on behalf of and for the benefit of Maryland consumers who transfered structured settlement payment rights in transactions involving some or all of the Defendants, for the reasons set forth in the accompanying Memorandum in Support. Defendants respectfully request a hearing on this Motion.

April 6, 2018

Respectfully submitted,

DEFENDANTS

/s/ Andrew J. Chiang
Andrew J. Chiang

O'HAGAN MEYER, PLLC
2560 Huntington Avenue, Suite 204
Alexandria, VA 22303
Telephone: (703) 775-8602
Email: achiang@ohaganmeyer.com

and

Charles M. Sims, *specially admitted*
O'HAGAN MEYER, PLLC
411 East Franklin Street, Suite 500
Richmond, VA 23219
Telephone: (804) 403-7111
Email: csims@ohaganmeyer.com

Counsel for Defendants Access Funding, LLC, Assoc, LLC, En Cor, LLC, Access Holding, LLC, Reliance Funding, LLC, Lee Jundanian, and Raffi Boghosian

/s/ Gregg. E. Viola
Gregg E. Viola, Esq.
Eric M. Rigatuso, Esq.
Eccleston & Wolf, P.C.
Baltimore-Washington Law Center
7240 Parkway Drive, 4th Floor
Hanover, MD 21076-1378

Counsel for Defendant Charles E. Smith

/s/ Michael T. Hamilton
Michael T. Hamilton, Esq.
Marks, O'Neill, O'Brien, Doherty, & Kelly, P.C.
600 Baltimore Avenue, Suite 305
Towson, MD 21204

Counsel for Defendant Michael Borkowski

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of April 2018, a copy of the foregoing *Defendants' Joint Motion for Partial Summary Judgment* was served upon on counsel of record via the Court's electronic filing system:

Christina Coll, Esq.
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
Attorneys for Plaintiff Consumer Financial Protection Bureau

/s/ Andrew J. Chiang
Andrew J. Chiang