UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. CASHCALL, INC., WS FUNDING, LLC, DELBERT SERVICES CORP., and J. PAUL REDDAM, Defendants.	)	No. 1:13-cv-13167 (GAO)

DEFENDANTS' MOTION TO TRANSFER VENUE TO THE CENTRAL DISTRICT OF CALIFORNIA OR, IN THE ALTERNATIVE, TO DISMISS ALL CLAIMS AGAINST J. PAUL REDDAM FOR LACK OF PERSONAL JURISDICTION

Defendants CashCall, Inc., WS Funding, LLC, Delbert Services Corp., and J. Paul Reddam ("Mr. Reddam"), respectfully move this Court pursuant to Fed. R. Civ. P. 12(b)(2)–(3) and 28 U.S.C. § 1404(a) to transfer the action to the Central District of California or, in the alternative, to dismiss the claims against Mr. Reddam for lack of personal jurisdiction.

In support of this Motion, Defendants file and incorporate by reference their Memorandum in Support of Defendants' Motion to Transfer Venue to the Central District of California or, in the Alternative, to Dismiss all Claims Against J. Paul Reddam for Lack of Personal Jurisdiction ("Memorandum of Law"), as well as the Affidavits of Daniel Baren, Cesar Guzman, and J. Paul Reddam.

As revealed in those submissions, the complaint's allegations do not support the exercise of personal jurisdiction over Mr. Reddam in Massachusetts. Transfer to the Central District of California, in which jurisdiction and venue exist over all defendants, would enhance judicial

economy. Transfer is likewise warranted under 28 U.S.C. § 1404(a) to promote the convenience of all parties, the convenience of witnesses, and efficient resolution of the controversy. If the Court elects to retain the action, however, the claims against Mr. Reddam must be dismissed.

WHEREFORE, for the reasons set forth in their accompanying Memorandum of Law, Defendants respectfully request that this Court grant their motion and transfer the case to the Central District of California or, in the alternative, dismiss all claims against Mr. Reddam.

Dated: February 28, 2014

Respectfully submitted,

/s/ Donn A. Randall
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CERTIFICATION PURSUANT TO LOCAL RULE 7.1(a)(2)

Pursuant to Local Rule 7.1(a)(2) of the United States District Court for the District of Massachusetts, I, Neil Barofsky, certify that on several occasions beginning on January 28, 2014, I conferred in good faith with Enforcement Attorneys for the Plaintiff, Consumer Financial Protection Bureau, regarding the relief requested in this motion, but that the parties were unable to resolve or further narrow the issues raised herein.

/s/ Neil M. Barofsky
Neil M. Barofsky

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), Defendants hereby request that the Court schedule a hearing for oral argument on their Motion to Transfer Venue to the Central District of California or, in the Alternative, to Dismiss all Claims Against J. Paul Reddam for Lack of Personal Jurisdiction. Counsel for Defendants believe that oral argument may assist the Court in its consideration of the merits of the motion.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants via first class mail, postage prepaid on February 28, 2014.

/s/ Donn A. Randall
Donn A. Randall

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