UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

Consumer Financial Protection Bureau

Plaintiff,

vs.

Craig Manseth, Jacob Adamo, Darren Turco, United Debt Holding, LLC, JTM Capital Management, LLC, UHG, LLC, UHG I, LLC (also known as United Holding Group) and UHG II, LLC (collectively holding themselves out as United Holding Group, United Holding Group, LLC and United Holdings Group, LLC)

Defendants.

Case No.: 1:22-cv-29

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION

PLEASE TAKE NOTICE, that Defendants United Debt Holding, LLC and JTM Capital Management, LLC through their undersigned counsel, respectfully move this Court to dismiss the First Amended Complaint under Fed. R. Civ. P. 8(a), 9(b), 12(b)(1), 12(b)(6), and the statute of limitations. The Support for this Motion is set forth in UDH and JTM's accompanying Joint Memorandum of Law.

PLEASE TAKE FURTHER NOTICE, pursuant to Local Rule 7(a)(1), UDH and JTM intend to file a reply brief in support of its motion.

Dated: March 21, 2022

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