IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU,	)	
Plaintiff,	)	
v.	)	Case No. 1:14-cv-2211-AT
FREDERICK J. HANNA & ASSOCIATES, P.C., et al.	)	
Defendants.	)	

REQUEST FOR ORAL ARGUMENT ON THE MOTION TO DISMISS

Pursuant to Section III.i. of the Court's Guidelines to Parties and Counsel, Defendants respectfully request that the Court hear oral argument on Defendants' Motion to Dismiss. The claims by the Consumer Financial Protection Bureau (the "Bureau") present several issues of first impression in this Circuit and in federal courts generally, including: the scope of the Bureau's authority; the applicability of the provision of Dodd-Frank prohibiting the Bureau from regulating the practice of law; the existence of a "meaningful attorney involvement" claim under the Fair Debt Collection Practices Act ("FDCPA") as it relates to the filing of lawsuits; whether Congress intended for the FDCPA to apply to core litigation practices in state court, which have traditionally been regulated by the states; First Amendment

and Equal Protection implications of the Bureau's attempt to civilly prosecute Defendants for litigation conduct in state court; and the Bureau's contention that the one-year statute of limitations period in the FDCPA does not apply when the government seeks to enforce liability under the FDCPA. Defendants believe that oral argument would assist the Court in evaluating the parties' numerous and, at times, complex arguments on these issues. The Bureau has represented to Defendants that it does not believe oral argument is necessary for the Court to decide the Motion to Dismiss.

WHEREFORE, Defendants respectfully request that the Court schedule oral argument on Defendants' Motion to Dismiss.

Respectfully submitted this 24th day of October, 2014.

/s/ Christopher J. Willis
Christopher J. Willis, Ga. Bar No. 766297
willisc@ballardspahr.com
BALLARD SPAHR LLP
999 Peachtree Street, Suite 1000
Atlanta, GA 30309-5915
Telephone (404) 678-9300
Facsimile: (404) 678-9301

Michael Bowers, Ga. Bar No. 071650
mbowers@balch.com
Christopher S. Anulewicz, Ga. Bar No. 020914
canulewicz@balch.com
BALCH & BINGHAM LLP
30 Ivan Allen Jr. Blvd., NW, Suite 700
Atlanta, Georgia 30308

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day, I filed the foregoing REQUEST FOR ORAL ARGUMENT ON THE MOTION TO DISMISS with the Clerk of Court using the CM/ECF system which will automatically serve the following parties:

Lawrence Brown (Lawrence.Brown@cfpb.gov)
Thomas Ward (Thomas.Ward@cfpb.gov)
Consumer Financial Protection Bureau
ATTN: Enforcement
1750 Pennsylvania Ave., 10th Floor
Washington, D.C. 20552

Date: October 24, 2014

/s/ Christopher J. Willis
Christopher J. Willis
Georgia Bar No. 766297

Counsel for Defendants

CERTIFICATION OF COMPLIANCE WITH L.R. 5.1B

I hereby certify that the foregoing has been computer processed with 14 point New Times Roman font in compliance with the United States District Court for the Northern District of Georgia Local Rule 5.1B.

Dated: October 24, 2014

/s/ Christopher J. Willis
Christopher J. Willis
Ga. Bar No. 766297

Counsel for Defendants