UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Consumer Financial Protection Bureau and the People of the State of New York by Letitia James, Attorney General for the State of New York, *Plaintiffs*, v. MoneyGram International, Inc. and MoneyGram Payment Systems, Inc., *Defendants*.	Case No. 1:22-cv-03256-KPF

DEFENDANTS' NOTICE OF MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF TEXAS AND NOTICE OF MOTION TO DISMISS THE FIRST AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated August 4, 2022, and the contemporaneously filed declarations in support and accompanying exhibits, Defendants MoneyGram International, Inc. and MoneyGram Payment Systems, Inc. ("Defendants"), by and through undersigned counsel, respectfully move this Court, before the Honorable Katherine Polk Failla, United States District Judge, United States District Court, Southern District of New York, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 618, City of New York, for an Order transferring this action to the Northern District of Texas pursuant to 28 U.S.C. § 1404(a) and dismissing Plaintiff's Amended Complaint pursuant to Rule 12(b)(1) and Rule 12(b)(6) of the Federal Rules of Civil Procedure.

As set forth in the accompanying Memorandum of Law, ample evidence demonstrates that the factors considered in the transfer analysis favor transfer, and dismissal is justified because (i) Plaintiffs have failed to state a claim upon which relief can be granted under Counts IV, VI, and VII, (ii) each Count is barred in whole or in part by the statute of limitations, and (iii) the

Consumer Financial Protection Bureau lacks standing due to a constitutionally deficient structure. Therefore, this Court should order this action transferred to the Northern District of Texas and should dismiss all claims of the First Amended Complaint except Count V as pled by the Office of the New York State Attorney General to the extent not barred by the statute of limitations.

Dated: August 4, 2022

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/s/ Ephraim Wernick

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