UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Consumer Financial Protection Bureau, Plaintiff, v. NDG Financial Corp., Northway Financial Corp., Ltd., Northway Broker, Ltd., E-Care Contact Centers, Ltd., Blizzard Interactive Corp., New World Consolidated Lending Corp., New World Lenders Corp., Payroll Loans First Lenders Corp., New World RRSP Lenders Corp., Peter Ash, Sagewood Holdings, Ltd., Kimberly DeThomas, Jeremy Sabourin, William Wrixon, Defendants, Peter Ash, Sagewood Holdings, Ltd., Paul Ash, Knightsbridge Holdings Ltd., Paul Grehan, 0562752 B.C., Ltd., Kimberly DeThomas, Emerald Willow Holdings, Ltd., Jeremy Sabourin, Red River Holdings Company Ltd., William Wrixon, Twillingate Holdings Ltd., Relief Defendants.	:	15-cv-5211 (CM)

NOTICE OF MOTION BY SAGEWOOD HOLDINGS, LTD., KNIGHTSBRIDGE HOLDINGS, LTD., PETER ASH AND PAUL ASH IN SUPPORT OF THEIR MOTION FOR RECONSIDERATION, OR IN THE ALTERNATIVE, FOR CERTIFICATION PURSUANT TO 28 U.S.C. § 1292(b)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and upon all pleadings and prior proceedings had herein, Defendants and Relief Defendants Sagewood Holdings, Ltd. and Peter Ash, and Relief Defendants Knightsbridge Holdings Ltd. and Paul Ash, through their undersigned counsel, will move this Court before the Honorable Colleen McMahon, U.S.D.J., in Courtroom 14C of the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time as the Court may direct, for reconsideration of its Decision and

Order dated December 2, 2016, Docket No. 98 or, in the alternative, for certification pursuant to 28 U.S.C. § 1292(b).

Dated: New York, New York
December 16, 2016

DLA PIPER LLP (US)

By: /s/ Richard F. Hans

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