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.

Civ. No. 1:15-cv-5211 (CM)

ECF Case

NOTICE OF 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 in Support of Relief Defendants Paul Grehan's and 0562752 B.C. Ltd.'s (collectively, the "Grehan Relief Defendants") Motion For Reconsideration, or in the Alternative, for Certification Pursuant to 28 U.S.C. § 1292(b), the Grehan Relief Defendants, by its undersigned counsel, will move before the Honorable Colleen McMahon, Chief Judge, in the United States Courthouse located at 500 Pearl Street, New York, New York, pursuant to Local Civil Rule 6.3, on a date and time as the

Court may direct, for an order granting reconsideration of the Court's December 2, 2016 Decision and Order, or in the alternative, for an order granting certification for interlocutory appeal, and for such other and further relief as the Court may determine to be just and proper.

Dated: New York, New York
December 16, 2016

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By: s/ Kenneth E. Lee

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