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

Case No. 15cv5211 (CM)(RWL)

NOTICE OF PLAINTIFF'S MOTION FOR VOLUNTARY DISMISSAL OF PETER ASH, SAGEWOOD HOLDINGS LTD., PAUL ASH, KNIGHTSBRIDGE HOLDINGS LTD., PAUL GREHAN, AND 0562752 B.C. LTD.

PLEASE TAKE NOTICE that, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Consumer Financial Protection Bureau hereby moves the Court for voluntary dismissal with prejudice of Peter Ash, Sagewood Holdings Ltd., Paul Ash, Knightsbridge Holdings Ltd., Paul Grehan, and 0562752 B.C. Ltd (the "Participating Defendants"), with the Bureau and the Participating Defendants bearing their own costs and fees. In the alternative, the Bureau moves pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure to amend its complaint to drop all claims against the Participating Defendants. The Bureau submits that such relief is necessary and proper and will not prejudice any defendant. The Participating Defendants consent to this motion.

Dated: November 21, 2017

Respectfully submitted,

KRISTEN A. DONOGHUE
Enforcement Director

DAVID RUBENSTEIN
Deputy Enforcement Director

CYNTHIA LESSER
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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	Case No. 15cv5211 (CM)(RWL)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this **21st day of November 2017,** I served a copy of the foregoing **Notice of Motion for Voluntary Dismissal** and all supporting documents and exhibits on all parties of record via the Court's CM/ECF system.

/s/ Charles R. Gayle
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