UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, -against- NDG FINANCIAL CORP., NORTHWAY FINANCIAL CORP., LTD., NORTHWAY BROKER, LTD., E-CARE CONTACT CENTERS, LTD., BLIZZARD INTERACTIVE CORP., SAGEWOOD HOLDINGS, LTD., NEW WORLD CONSOLIDATED LENDING CORP., NEW WORLD LENDERS CORP., PAYROLL LOANS FIRST LENDERS CORP., and NEW WORLD RRSP LENDERS CORP., Defendants.	:	ECF Case INDEX NO. 15-cv-5211 (CM)

NOTICE OF MOTION BY SAGEWOOD HOLDINGS, LTD. TO DISMISS PLAINTIFF'S COMPLAINT FOR LACK OF PERSONAL JURISDICTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and the accompanying Declaration of Peter Ash, and upon all pleadings and prior proceedings had herein, Defendant Sagewood Holdings, Ltd. ("Sagewood"), through its 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 an Order, pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure, dismissing each of the claims asserted against Sagewood and for such other and further relief as the Court may determine to be just and proper.

Dated: New York, New York
November 17, 2015

DLA PIPER LLP (US)

By: /s/ Richard F. Hans

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