UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

-against-

NDG FINANCIAL CORP., *et al.*,

Defendants and Relief Defendants.

15-cv-5211 (CM)

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NOTICE OF MOTION BY SAGEWOOD HOLDINGS, LTD., KNIGHTSBRIDGE HOLDINGS, LTD., PETER ASH AND PAUL ASH TO DISMISS THE AMENDED COMPLAINT

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 (collectively, the "Sagewood/Knightsbridge Defendants") 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 an Order, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing each of the claims asserted against the Sagewood/Knightsbridge Defendants and for such other and further relief as the Court may determine to be just and proper.

Dated: New York, New York
March 16, 2016

DLA PIPER LLP (US)

By: /s/ Richard F. Hans

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