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 NDG DEFENDANTS TO DISMISS PLAINTIFF'S AMENDED COMPLAINT

PLEASE TAKE NOTICE that, with the accompanying Memorandum of Law, the NDG Defendants,[1] through their undersigned counsel, will move this Court before the Honorable Colleen McMahon, United States District Judge, in Courtroom 17C of the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time as the Court directs, for an Order pursuant to Rule 12(b)(2) and Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing each of the claims asserted against the NDG Defendants and for such other relief that the Court deems just and proper.

[1] The NDG Defendants are 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., Kimberly DeThomas, Jeremy Sabourin, William Wrixon, Emerald Willow Holdings, Ltd., Red River Holdings Company Ltd., and Twillingate Holdings, Ltd.

Dated: New York, New York
March 16, 2016

DECHERT LLP

By: */s/ Jeffrey Brown*

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