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)

NOTICE OF MOTION TO DISMISS THE FIRST AMENDED COMPLAINT PURSUANT TO RULES 12(b)(2) AND 12(b)(6)

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 to Dismiss the First Amended Complaint, the Grehan Relief Defendants, by its undersigned counsel, will move before the Honorable Colleen McMahon, United States District Judge, in the United States Courthouse located at 500 Pearl Street, New York, New York, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, on a date

and time as the Court may direct, for an order dismissing it from the above captioned matter with prejudice and for such other and further relief as the Court may determine to be just and proper.

Dated: New York, New York
April 11, 2016

LEVINE LEE LLP

By: s/ Kenneth E. Lee

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