UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

Case No. 15-23070-Civ-COOKE/TORRES

Consumer Financial Protection Bureau,

Plaintiff,

v.

ORION PROCESSING, LLC, a Texas limited liability company, d/b/a World Law Processing, Wld Credit Repair, and World Law Debt; FAMILY CAPITAL INVESTMENT & MANAGEMENT LLC, a Delaware limited liability company, a/k/a FCIAM Property Management; WORLD LAW DEBT SERVICES, LLC, a Delaware limited liability company; WORLD LAW PROCESSING, LLC, a Delaware limited liability company; DERIN SCOTT, an individual; DAVID KLEIN, an individual; and BRADLEY JAMES HASKINS, individually and d/b/a World Law Group, LLP, World Law Group America, LLP, WLD Price Global, Inc., World Law Forms and Mediation, and World Law South;

Defendants,

Shannon Scott, an individual,

Relief Defendant.

NOTICE OF FILING REVISED PROPOSED PRELIMINARY INJUNCTION WITH ASSET FREEZE, APPOINTMENT OF RECEIVER, EXPEDITED DISCOVERY, AND OTHER EQUITABLE RELIEF FOR DEFENDANTS DERIN SCOTT, DAVID KLEIN, FAMILY CAPITAL INVESTMENT & MANAGEMENT LLC, AND RELIEF DEFENDANT SHANNON SCOTT

Defendant David Klein, through undersigned counsel, submits his Notice of Filing Revised Proposed Preliminary Injunction with Asset Freeze, Appointment of Receiver, Expedited Discovery, and Other Equitable Relief for Defendants Derin Scott, David Klein, Family Capital Investment & Management LLC, and Relief Defendant Shannon Scott, and states the following:

Counsel for Defendant Klein has conferred with counsel for Plaintiff, the Consumer Financial Protection Bureau ("CFPB"), regarding the original Proposed Preliminary Injunction, submitted with their complaint on August 17, 2015, and the parties have agreed to modify the language to include the following in Section VI:

"***Provided however***, that this Order does not prevent Individual Defendants from opening new bank or credit card accounts so long as such accounts are funded only with monies not attributable to the activities alleged in the Bureau's Complaint, and so long as the Individual Defendants contemporaneously notify the Receiver and the Bureau in writing of such openings, the source of the funds for any such accounts, and the intended source of such funds in the future."

The original Proposed Preliminary Injunction is submitted herewith as Exhibit A, and a blackline is submitted herewith as Exhibit B. Upon conferral, Counsel for Plaintiff consents to the revisions, and Counsel for Defendant Klein respectfully requests that the attached Proposed Preliminary Injunction replace the original.

Respectfully submitted,

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SERVICE LIST
(Case No.: 1:15-CV-23070-COOKE/TORRES)

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