UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION BUREAU and THE PEOPLE OF THE STATE OF NEW YORK, BY ERIC T. SCHNEIDERMAN, ATTORNEY GENERAL FOR THE STATE OF NEW YORK,

Plaintiffs,

v.

RD LEGAL FUNDING, LLC; RD LEGAL FINANCE, LLC; RD LEGAL FUNDING PARTNERS, LP; and RONI DERSOVITZ,

Defendants.

Case No. 1:17-cv-00890 (LAP)

NOTICE OF MOTION

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PLEASE TAKE NOTICE that, with the accompanying Memorandum of Law and Affidavit of Roni Dersovtiz and exhibits, Defendants RD Legal Funding, LLC, RD Legal Finance, LLC, RD Legal Funding Partners, LP, and Roni Dersovitz, through undersigned counsel, will move this Court before the Honorable Loretta A. Preska, United States District Judge, in Courtroom 12A of the Daniel Patrick Moynihan 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)(6) of the Federal Rules of Civil Procedure finding that the Consumer Financial Protection Bureau is unconstitutional, dismissing without leave to amend each of the claims asserted against Defendants, and for such other relief that the Court deems just and proper.

Dated this 15th day of May, 2017.

Respectfully submitted,

/s/ Michael Roth

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