UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
GREAT FALLS DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU, *Plaintiff,* v. THINK FINANCE, LLC, formerly known as Think Finance, Inc., THINK FINANCE SPV, LLC, FINANCIAL U, LLC, TC LOAN SERVICE, LLC, TAILWIND MARKETING, LLC, TC ADMINISTRATIVE SERVICES, LLC, and TC DECISION SCIENCES, LLC *Think Entities.*	Case No. 4:17-cv-00127-BMM

DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT

Defendants Think Finance, LLC, Think Finance SPV, LLC, Financial U, LLC, TC Loan Service, LLC, Tailwind Marketing, LLC, TC Administrative Services, LLC, and TC Decision Services, LLC (collectively the "Think Entities"), respectfully submits this Motion to Dismiss Plaintiff's Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) (all Think Entities) and 12(b)(2) (Think Finance SPV, LLC only). The grounds for the relief requested in this motion are set forth in the Memorandum filed contemporaneously with this motion. The Think Entities respectfully request oral argument on this Motion. Pursuant to Local Rule 7.1(c)(1), opposing counsel for Plaintiff has been contacted concerning this Motion and opposes the requested relief.

For the reasons set forth in the Memorandum, the Think Entities respectfully request that this Court dismiss the Complaint.

Respectfully submitted,

Dated: April 24, 2018

By: */s/ Thomas M. Hefferon*

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/s/ Leo S. Ward (with permission)

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CERTIFICATE OF SERVICE

I, Thomas M. Hefferon, certify that on this 24th day of April, 2018, I served the foregoing document on all counsel of record via the Court's CM/ECF system. The document is available for viewing and downloading from the ECF system.

/s/ Thomas M. Hefferon
Thomas M. Hefferon