UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

v.

UNIVERSAL DEBT & PAYMENT SOLUTIONS, LLC, *et al.*,

Defendants.

Civil Action No.

1:15-CV-0859-RWS

PLAINTIFF'S RESPONSE TO GLOBAL PAYMENTS' REQUEST FOR ORAL ARGUMENT

The Consumer Financial Protection Bureau ("Bureau") submits this response to Global Payments Inc.'s ("Global") request for oral argument and Pathfinder's and Frontline's joint statement requesting to join in any such argument. Global has had adequate opportunity to present its arguments in support of its motion to dismiss. Together with the Bureau's opposition brief, and briefs filed by Frontline and Pathfinder, the questions before the Court have been extensively and ably briefed. Accordingly, the Bureau believes that argument is unnecessary. Of course, if the Court concludes that it would

benefit from oral argument, the Bureau will make itself available at the Court's convenience.

Dated: July 9, 2015

Respectfully Submitted,

Attorneys for Plaintiff

Consumer Financial Protection Bureau:

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Enforcement Director

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CERTIFICATE OF COMPLIANCE

The undersigned attorney hereby certifies, pursuant to LR 7.1.D, that the foregoing Motion was prepared in Century Schoolbook 13 point font.

/s/ Jonathan B. Engel
_____
Jonathan B. Engel
Enforcement Attorney

Dated: July 9, 2015

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this day a true and correct copy of Plaintiff's Response to Global Payments' Request for Oral Argument was filed with the clerk of court using the CM/ECF system which will automatically send email notification of the filing to all attorneys of record.

/s/ Jonathan B. Engel
_____
Jonathan B. Engel
Enforcement Attorney

Dated: July 9, 2015