IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, vs. UNIVERSAL DEBT & PAYMENT SOLUTIONS, LLC, et al., Defendant.	: : : : : : : : : : :	CIVIL ACTION FILE NO. 1:15-cv-00859-RWS

DEFENDANTS SUMANT KHAN AND S PAYMENT PROCESSING & SOLUTIONS, LLC'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Sumant Khan and S Payment Processing & Solutions LLC ("SPPS") submit this Brief in support of their Motion for Summary Judgment on Counts I, II, and III asserted in Plaintiff Consumer Financial Protection Bureau's Complaint. As set forth in the accompanying memorandum of law, these Defendants' motion should be granted because there are no genuinely disputed issues of material fact as to Counts I, II, and III, thereby entitling Mr. Khan and SPPS to judgment as a matter of law on Plaintiff's claims.

Respectfully submitted this 15th day of November, 2017.

/s/ Jason R. Edgecombe
Jason R. Edgecombe
Ga. Bar No. 239606
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
3414 Peachtree Road NE
Suite 1600
Atlanta, Georgia 30326
404-577-6000 (ph)
404-221-6501 (fax)
jedgecombe@bakerdonelson.com

ATTORNEY FOR DEFENDANTS SUMANT KHAN AND S PAYMENT PROCESSING & SOLUTIONS, LLC

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing upon counsel for Plaintiff via the court's CM/ECF system, which will automatically generate a notice of filing to all attorneys of record.

This 15th day of November, 2017.

/s/ Jason R. Edgecombe
Jason R. Edgecombe