IN THE 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 MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANTS MARCUS BROWN, MOHAN BAGGA, SUMANT KHAN, SARITA BROWN, TASHA PRATCHER, S PAYMENT PROCESSING & SOLUTIONS, LLC, AND WNY ACCOUNT SOLUTIONS, LLC

Plaintiff, the Consumer Financial Protection Bureau, pursuant to Rule 56 of the Federal Rules of Civil Procedure, all applicable Local Rules, and Judge Story's Standing Order Regarding Civil Litigation, hereby moves for summary judgment against the above-referenced Defendants on Counts I-VII of the Complaint. This Motion is supported by a brief, a statement of material facts as to which there is no genuine issue to be tried, exhibits to the brief consisting of declarations and copies of discovery materials, a proposed order, and separately filed transcripts of depositions.

Dated: November 15, 2017

Respectfully Submitted,

Attorneys for Plaintiff
Consumer Financial Protection Bureau:

KRISTEN DONOGHUE
Enforcement Director

DAVID RUBENSTEIN
Deputy Enforcement Director

THOMAS KIM
Assistant Deputy Enforcement Director

/s/ Mary K. Warren

Mary K. Warren (NY bar #2557684)
John Thompson (NM bar #139788)
Rebecca Coleman (MD)
Maureen McOwen (DC bar # 976749)
ENFORCEMENT ATTORNEYS
1700 G Street NW
Washington, DC 20552
Phone (Warren): 202-435-9284
Phone (Thompson): 202-435-7270
Phone (Coleman): 202-435-7541
Phone (McOwen): 202-435-9553
Email: *Mary.Warren@cfpb.gov*
Email: *John.Thompson@cfpb.gov*
Email: Rebecca.Coleman@cfpb.gov
Email: Maureen.Mcowen@cfpb.gov
Fax: 202-435-7722

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on this day a true and correct copy of the foregoing document 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, and was mailed by United Parcel Service to the following defendants that do not have access to the CM/ECF system:

Mohan Bagga
6375 Whitestone Place
Duluth, GA 30097

Sarita Brown
1440 Jefferson Ave., #233
Buffalo, NY 14208-1827

Tasha Pratcher
142 Stratford Avenue
Buffalo, NY 14216

/s/ Mary K. Warren
_____
Mary K. Warren
Enforcement Attorney

Dated: November 15, 2017