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

CONSUMER FINANCIAL PROTECTION BUREAU,	)	
Plaintiff,	)	Civil Action File No. 1:15-CV-0859-RWS
v.	)	
UNIVERSAL DEBT & PAYMENT SOLUTIONS, LLC, ET AL.,	)	
Defendants.	)	

DEFENDANT VARINDERJIT "VEENA" BAGGA'S MOTION FOR SUMMARY JUDGMENT ON CROSSCLAIM OF DEFENDANT FRANCIS DAVID CORPORATION D/B/A ELECTRONIC MERCHANT SYSTEMS

COMES NOW Defendant Varinderjit "Veena" Bagga and respectfully moves the Court for entry of an order granting summary judgment in her favor on Defendant Francis David Corporation d/b/a Electronic Merchant Systems' Crossclaim. In support of this Motion, Defendant files (1) her Brief in Support and exhibits thereto, including the Affidavit of Varinderjit "Veena" Bagga, and (2) her Statement of Undisputed Material Facts.

Respectfully submitted this 15th day of November, 2017.

/s/ Carolyn "Tippi" Cain Burch
Carolyn "Tippi" Cain Burch
Georgia Bar No. 094515
CHALMERS BURCH & ADAMS LLC
75 Fourteenth Street, Suite 2725
Atlanta, Georgia 30309
678.582.8902
tburch@cpblawgroup.com

ATTORNEY FOR DEFENDANT VARINDERJIT "VEENA" BAGGA

CERTIFICATE OF COMPLIANCE AND SERVICE

I hereby certify that the foregoing pleading was prepared using Times New Roman 14pt Font, and that I have on this 15th day of November, 2017, filed a true and correct copy of the foregoing

DEFENDANT VARINDERJIT "VEENA" BAGGA'S MOTION FOR SUMMARY JUDGMENT ON CROSSCLAIM OF DEFENDANT FRANCIS DAVID CORPORATION D/B/A ELECTRONIC MERCHANT SYSTEMS

with the clerk of court using the CM/ECF system, which will automatically send an electronic notification of such filing to all attorneys of record.

/s/ Carolyn "Tippi" Cain Burch
Carolyn "Tippi" Cain Burch
Georgia Bar No. 094515