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

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

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JAN 22 2018

JAMES N. HATTEN, Clerk
By: Deputy Clerk

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS MOHAN BAGGA AND UNIVERSAL DEBT AND PAYMENT SOLUTIONS, LLC REPLY IN FURTHER SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendants Mohan Bagga and UDPS submits this reply memorandum in support further of their Motion for Summary Judgment, as asserted in Plaintiff Consumer Financial Protection Bureau's Complaint.

INTRODUCTION

Defendants would like to request to the Court that based on the evidence gathered during this litigation plaintiff may not be granted to summary judgment under FDCPA, CFPA and all claims based on the following reasons:

Defendant's same style and type of signature has been forged on documents more than eighty (80) times on applications for merchant accounts and several documents for financial gain by the parties involved. Illegal funds have been obtained by committing fraud against the defendants and consumer in general. Due to forgery of signatures on several documents, Plaintiffs summary judgment should not be granted, as there are material issues of facts to be tried.

For all Counts (I-VI); counts (I-VIII), due to the nature of fraud involved by WNY and Marcus Brown. I would like to request a hearing to address the particularity of fraud involved by WNY and Marcus Brown.

Dated: January 22, 2017

Respectfully Submitted

Mohan Bagga (Prose)

CERTIFICATE OF COMPLIANCE

The undersigned Mohan Bagga hereby certifies, pursuant to LR 7.1.D, that the foregoing document was prepared in Century Schoolbook 14 point font.

Mohan Bagga

Pro/Se

CERTIFICATE OF SERVICE

The undersigned Mohan Bagga hereby certifies that on this day a true and correct copy of the foregoing document was filed with the clerk of court.

01/22/2018

U.S. DISTRICT COURT

Northern District of Georgia

CASE NUMBER : 1:15-VC-00859-RWS

Filer : Mohan Bagga

1:15-cv-00859-RWS has been electronically mailed to:

Benjamin Ockner	bockner@bernsockner.com
Mary Warren	Mary.Warren@cfpb.gov
John David Thompson	John.Thompson@cfpb.gov
Rebecca J Coleman	Rebecca.Coleman@cfpb.gov
Jason Edgecombe	jedgecombe@bakerdonelson.com
Tasha Pratcher	pratcht@aol.com
Marcus Brown	fall08_mb@yahoo.com
Sarita Brown	fall08_mb@yahoo.com