UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA,
ATLANTA DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. UNIVERSAL DEBT & PAYMENT SOLUTIONS, LLC; et al. Defendants.	)	CASE NO. 1:15-CV-0859-RWS

GLOBAL PAYMENTS INC.'S MOTION TO DISMISS COMPLAINT WITH PREJUDICE

Defendant Global Payments Inc. ("Global") respectfully moves this Court, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss with prejudice all claims asserted by Plaintiff the Consumer Financial Protection Bureau in its Complaint for failure to state a claim. In support, Global states as follows:

First, the Complaint fails to allege facts supporting an inference that Global knowingly or recklessly provided substantial assistance to the debt collectors named as defendants in this case. As a result, Count VIII should be dismissed.

Second, the Complaint fails to allege facts that Global's mere processing of card payments in the normal course of business—as distinct from the alleged

intentionally fraudulent acts of the Debt Collectors—caused the consumer injury required to state a claim for unfairness. As a result, Count IX should be dismissed.

Third, the Complaint fails to plead facts supporting Global's role in the Debt Collectors' fraudulent scheme sufficient to satisfy the particularity requirements of Rule 9(b). For this additional reason, Counts VIII and IX should be dismissed.

WHEREFORE, for these reasons and those set forth in the accompanying Memorandum in Support, Global Payments Inc. requests that this Court dismiss with prejudice all claims asserted by Plaintiff against it in the Complaint.

Dated: May 14, 2015

Respectfully submitted,

/s/ *Michael A. Caplan*
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing GLOBAL PAYMENTS INC.'S MOTION TO DISMISS COMPLAINT WITH PREJUDICE to be delivered this 14th day of May 2015, to all counsel of record through the Court's ECF filing system.

/s/_ *Michael A. Caplan*
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