IN THE UNITED STATES DISTRICT COURT
FOR THE 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

DEFENDANT FRONTLINE PROCESSING CORPORATION'S MOTION TO DISMISS COMPLAINT WITH PREJUDICE

Defendant Frontline Processing Corporation ("Frontline") 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 against Frontline in its Complaint for failure to state a claim.

First, the Complaint fails to plausibly state a claim that Frontline knowingly or recklessly provided substantial assistance to the Debt Collectors in violation of 12 U.S.C. § 5536(a)(3). As a result, Count 8 should be dismissed.

Second, the Complaint fails to plausibly state a claim that Frontline is a "covered person or service provider" under 12 U.S.C. § 5541, and also fails to

plausibly allege that Frontline engaged in an unfair act or practice in violation of 12 U.S.C. § 5536(a)(1)(B). As a result, Count 9 should be dismissed.

For these reasons, and the additional reasons set forth in the accompanying Memorandum of Law in Support and as set for the in the record in this matter, Frontline requests that this Court dismiss with prejudice all claims asserted by Plaintiff against it in the Complaint.

Dated: May 19, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2015, I electronically filed the foregoing DEFENDANT FRONTLINE PROCESSING CORPORATION'S MOTION TO DISMISS COMPLAINT WITH PREJUDICE with the Clerk of Court using the CM/ECF system, which will send notifications of such filings to all counsel of record in this action.

/s/ Bryan R. Freeman
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