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The Williamson Law Firm, LLC, Williamson &
Howard, LLP, Vincent D. Howard,
and Lawrence Williamson

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CONSUMER FINANCIAL PROTECTION BUREAU,

Plaintiff,

v.

VINCENT HOWARD, LAWRENCE W. WILLIAMSON, HOWARD LAW, P.C., THE WILLIAMSON LAW FIRM, LLC, AND WILLIAMSON & HOWARD, LLP,

Defendants.

Case No. 8:17-CV 00161

AMENDED NOTICE OF MOTION TO DISMISS COMPLAINT OR IN THE ALTERNATIVE FOR MORE DEFINITE STATEMENT

HON. JOSEPHINE L. STATON

DATE: May 26, 2017
TIME: 2:30 P.M.
PLACE: Ctrm. 10A

PLEASE TAKE NOTICE that on **May 26, 2017 at 2:30 p.m.** in Department 10A of the above-entitled Court, located at 411 West 4th Street, Santa Ana, Howard Law, P.C., Williamson & Howard, LLP, The Williamson Firm, LLC, Vincent Howard and Lawrence Williamson (collectively the "Defendants") will move this Court for an order granting the following relief: A) Dismissing all claims alleged in that certain *Complaint for Permanent Injunction and Other Relief* (the "Attorney Complaint") filed by the Consumer Financial Protection Bureau (the "CFPB" or the "Plaintiff") attached to the accompanying Declaration of Sean A. O'Keefe as Exhibit "A"; B) if the foregoing prayer for dismissal is not granted, compelling the Plaintiff to provide a more definite statement with respect to each claim alleged; and C) granting such further relief as the Court deems just and proper. This Amended Notice shall replace and supersede the Notice previously filed with the Motion, Declaration of Sean O'Keefe, Notice of Lodging of Proposed Order and Proposed Order. (Dckt. Entry 27.)

DATED: March 30, 2017

OKEEFE & ASSOCIATES
LAW CORPORATION, P.C.

/s/ Sean A. O'Keefe

By: _____
Sean A. O'Keefe, attorneys for the Defendants

DATED: March 30, 2017

THE VANDERPOOL LAW FIRM

/s/ Douglas B. Vanderpool

By: _____
Douglas B. Vanderpool, attorneys for the defendants

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am employed by the law office of Douglas B. Vanderpool in the County of Orange, State of California. I am over the age of 18 and not a party to the above-captioned action. My business address is 330 Main Street, Suite 203B, Seal Beach, Ca 90740.

On March 30, 2017 I served a copy of the attached documents entitled: **AMENDED NOTICE OF MOTION TO DISMISS COMPLAINT OR IN THE ALTERNATIVE FOR MORE DEFINITE STATEMENT** on the interested parties in this action as follows:

See Attached Service List

[] BY MAIL: By placing a true and correct copy thereof enclosed in a sealed envelope addressed as above, with postage thereon fully prepared, in the U.S. Mail at Seal Beach, California. I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal service on the same day with postage thereon fully prepaid at Seal Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing as stated in the affidavit.

[XX] BY ELECTRONIC MAIL: I personally sent the attached document from my e-mail account, doug@vanderpool-law.com to the recipient's e-mail account set forth in the service list. I did not receive any electronic transmission or other message within a reasonable time that the delivery was unsuccessful.

[ ] BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the offices of the addressee(s).

[XX] **(Federal)** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 30, 2017 at Seal Beach, California.

S// *Heather A. Tovar*

Heather Tovar

SERVICE LIST

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