Douglas B. Vanderpool, Esq. (SBN 162857)
Heather A. Tovar, Esq. (SBN 237004)
THE VANDERPOOL LAW FIRM
330 Main Street, Suite 203B
Seal Beach, CA 90740
Tel: 562.431.6900; Fax: 714.276.0558
Email: doug@vanderpool-law.com; heather@vanderpool-law.com

Attorneys for Howard Law, P.C., 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

DEFENDANTS' NOTICE OF MOTION FOR TERMINATING AND MONETARY SANCTIONS PURSUANT TO FED. R. CIV. P. 11 AND 28 U.S.C. §1927

HON. JOSEPHINE L. STATON

DATE: March 23, 2018
TIME: 2:30 P.M.
PLACE: Ctrm. 10A

PLEASE TAKE NOTICE that on March 23, 2018 at 2:30 p.m., in Department 10 A of the United States District Courthouse for the Central District of California located at 411 West Fourth Street, Santa Ana, CA, Defendants Howard Law, PC, the Williamson Law Firm, LLC, Williamson & Howard, LLP, Vincent Howard and Lawrence Williamson will move for an order for Terminating and Monetary Sanctions pursuant to Fed. R. Civ. P. 11 and 28 U.S.C. §1927 against Plaintiff, the Consumer Financial Protection Bureau on the grounds the CFPB has abused its position of trust by offering false evidence and frivolous pleadings to the Court in this action.

This Motion is based upon this Notice, the Memorandum of Points and Authorities filed concurrently herewith, the Declarations of Douglas B. Vanderpool and Randal Shaheen, the records and files of this Court and upon all other such evidence as the Court deems just and proper.

DATED: February 16, 2018

THE VANDERPOOL LAW FIRM

/s/ Douglas B. Vanderpool

By: _____

Douglas B. Vanderpool, Esq. (SBN 162857)
Heather A. Tovar, Esq. (SBN 237004)
THE VANDERPOOL LAW FIRM
330 Main Street, Suite 203B
Seal Beach, CA 90740
Tel: 562.431.6900; Fax: 714.276.0558
Email: doug@vanderpool-law.com;
heather@vanderpool-law.com

PROOF OF SERVICE
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 February 16, 2018, I served a copy of the attached documents entitled: **DEFENDANTS' NOTICE OF MOTION FOR TERMINATING AND MONETARY SANCTIONS PURSUANT TO FED. R. CIV. P. 11 AND** 1927 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 February 16, 2018 at Seal Beach, California.

//s// Pamela Condon

Pamela Condon

SERVICE LIST

Cara Petersen
Jan Singelmann
Amy Radon
Consumer Financial Protection Bureau
1700 G Street
Washington DC 20552
Email: amy.radon@cfpb.gov; jan.singelmann@cfpb.gov; kristin.bateman@cfpb.gov

Leanne E. Hartmann
Consumer Financial Protection Bureau
301 Howard Street, Suite 1200
San Francisco, CA 94105
Email: Leanne.hartmann@cfpb.gov

Attorneys for Consumer Financial Protection Bureau