UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CONSUMER FINANCIAL PROTECTION BUREAU, Plaintiff, v. WELTMAN, WEINBERG & REIS CO., L.P.A., Defendant.	Case No. 1:17 CV 817 Judge Donald C. Nugent Magistrate Judge William H. Baughman, Jr. ORAL ARGUMENT REQUESTED

MOTION FOR PARTIAL SUMMARY JUDGMENT ON COUNTS I-III OF THE PLAINTIFF'S COMPLAINT

Plaintiff, the Consumer Financial Protection Bureau (Bureau) respectfully moves this Court under Federal Rule of Civil Procedure 56 to grant summary judgment in its favor and against Defendant Weltman, Weinberg and Reis Co., L.P.A. (WWR) as to liability on Counts I-III of the Bureau's Complaint. The Bureau requests oral argument.

The undisputed facts demonstrate that WWR violated the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692e(3), (10), and the Consumer Financial Protection Act of 2010 (CFPA), 12 U.S.C. §§ 5531(a)(1), 5536(a)(1)(A), 5536(a)(1)(B), by sending form demand letters that misrepresented that WWR attorneys were meaningfully involved in collecting consumers' debts. Thus, the Bureau is entitled to judgment in its favor on Counts I-III of the Complaint.

This motion is supported by the Bureau's Memorandum of Points and Authorities and accompanying exhibits, which are filed contemporaneously with this Motion and which are incorporated by reference.

Dated: February 23, 2018

Respectfully submitted,

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Certificate of Service

I hereby certify that on February 23, 2018, a copy of the foregoing Motion for Summary Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

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