

UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU

_____)	
ADMINISTRATIVE PROCEEDING)	
File No. 2015-CFPB-0029)	
)	
In the matter of:)	RESPONDENTS' UNOPPOSED
)	MOTION FOR EXTENSION OF
)	TIME TO FILE MOTIONS FOR
)	SUMMARY DISPOSITION
)	
INTEGRITY ADVANCE, LLC and)	
JAMES R. CARNES)	
_____)	

**RESPONDENTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
MOTIONS FOR SUMMARY DISPOSITION**

Pursuant to the Order Following Scheduling Conference and 12 C.F.R. § 1081.115, Respondents Integrity Advance, LLC, and James R. Carnes (“Respondents”), respectfully request an extension of time to file motions for summary disposition. Specifically, Respondents seek to modify the current Scheduling Order as set forth below.

In the Order Modifying Scheduling Order (“Scheduling Order”), issued March 3, 2016, the Court set the deadline for filing motions for summary disposition at May 2, 2016, based in part on the proximity of the Court’s ruling on Respondents’ Motion to Dismiss. Thus, the current Scheduling Order contemplates that the parties would have roughly three weeks between the date of the Court’s ruling on dismissal and the deadline for filing for summary disposition. The unopposed schedule adjustments set out below seek to maintain such timeframe without unduly impacting the overall schedule of this proceeding.

Pursuant to the Order Following Scheduling Conference, undersigned counsel conferred with counsel for the Bureau on April 20 and 25, 2016 regarding modification of the schedule.

As a result of that discussion, the Bureau does not oppose Respondents’ request to modify the Scheduling Order as set out below:

<i>Filing:</i>	<i>Current Deadlines:</i>	<i>New Deadlines:</i>
Motions for Summary Disposition due.	May 2, 2016	May 10, 2016
Oppositions to Motions for Summary Disposition due.	May 23, 2016	May 27, 2016
Replies to Oppositions to Motions for Summary Disposition due.	May 31, 2016	June 3, 2016

For the foregoing reasons, Respondents respectfully request that the Court grant Respondents’ Unopposed Motion for Extension of Time to File Motions for Summary Disposition.

Respectfully submitted,

Dated: April 25, 2016

By: Allyson B. Baker

Allyson B. Baker, Esq.
 Peter S. Frechette, Esq.
 Hillary S. Profita, Esq.
 Christine E. White, Esq.
 VENABLE LLP
 575 7th St. N.W.
 Washington, D.C. 20004
 (202) 344-4000

Attorneys for Respondents
 Integrity Advance, LLC and James R. Carnes

CERTIFICATION OF SERVICE

I hereby certify that on the 25th day of April 2016, I caused a copy of the foregoing Answer to be filed by electronic transmission (e-mail) with the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), Heather L. MacClintock (Heather.L.MacClintock@uscg.mil) and Administrative Law Judge Parlen L. McKenna (cindy.j.melendres@uscg.mil), and served by electronic mail on the following parties who have consented to electronic service:

Deborah Morris, Esq.
Deborah.Morris@cfpb.gov

Craig A. Cowie, Esq.
Craig.Cowie@cfpb.gov

Alusheyi J. Wheeler, Esq.
Alusheyi.Wheeler@cfpb.gov

Wendy J. Weinberg, Esq.
Wendy.Weinberg@cfpb.gov

Vivian W. Chum, Esq.
Vivian.Chum@cfpb.gov

/s/ Peter S. Frechette _____

Peter S. Frechette, Esq.