UNITED STATES OF AMERICA Before the CONSUMER FINANCIAL PROTECTION BUREAU

ADMINISTRATIVE PROCEEDING
File No. 2015-CFPB-0029
In the matter of:
INTEGRITY ADVANCE, LLC and
JAMES R. CARNES

RESPONDENTS' MOTION FOR THE PRODUCTION OF WITNESS STATEMENTS

Pursuant to 12 C.F.R. §1081.207(a), Respondents Integrity Advance, LLC and James R. Carnes (collectively, "Respondents,") respectfully move the Court to order that the Consumer Financial Protection Bureau (the "Bureau") produce any statement of any person to be called as a witness by the Bureau that is expected to pertain to his or her direct testimony and that would be required to be produced pursuant to 18 U.S.C. §3500 if the adjudication proceeding were a criminal proceeding. Good cause exists to grant the requested Order, as 12 C.F.R. §1081.207(a) provides that "[a]ny respondent may move" for the aforementioned relief.

WHEREFORE, in light of the preliminary scheduling order agreed upon by the parties during the December 14, 2015 scheduling conference, Respondents respectfully request that the Court order that the Bureau produce the aforementioned statements on or before December 21, 2015.

Respectfully submitted,

Dated: December 14, 2015 By: ____/s/ Allyson B. Baker____

Allyson B. Baker, Esq. Peter S. Frechette, Esq. Hillary S. Profita, Esq. Joanna P. Boyd, 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 14th day of December, 2015, I caused a copy of the foregoing Motion for the Production of Witness Statements to be filed by electronic transmission (e-mail) with the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), Curtis E. Renoe (Curtis.e.renoe@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:

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/s/ Hillary S. Profita Hillary S. Profita, Esq.