UNITED STATES OF AMERICA BEFORE THE CONSUMER FINANCIAL PROTECTION BUREAU

| In the Matter | ot: | |
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Administrative Proceeding File No. 2016-CFPB-0017

Auto Cash Leasing, LLC, Respondent.

JOINT MOTION TO EXTEND TIME TO ANSWER THE NOTICE OF CHARGES

Pursuant to 12 C.F.R. § 1081.115, Enforcement Counsel and Auto Cash Leasing, LLC ("Respondent") jointly move the Court for an order granting an extension of time by which Respondent may answer the Bureau's Notice of Charges by 21 days.

On October 14, 2016, the Court granted Respondent's Motion to Extend Time to Answer Notice of Charges and Hold Scheduling Conference, extending the period of time for Respondent to Answer the Notice of Charges to October 27, 2016 and the time within which to hold the scheduling conference to November 2, 2016. On October 24, 2016, the Court granted the Parties joint motion to vacate the October 27, 2016 Answer deadline, to be reset at the November 2, 2016 scheduling conference. At the November 2, 2016 scheduling conference, the Court set December 2, 2016 as the new Answer deadline in order to allow settlement discussions to continue.

The Parties are still in settlement discussions. Accordingly, the Parties jointly now request an additional 21-day extension, to **December 23, 2016**, for Respondent to Answer the Notice of Charges. The factors set forth in 12 C.F.R. § 1081.115 weigh in favor of an extension. Although the Court has granted two extensions, the proceeding

has been pending for less than two months, the Parties are at an ideal stage to discuss settlement because neither Party nor the Court have had to expend significant resources yet, and allowing the Parties to seek early resolution of this matter would not impede the Court's ability to complete the proceeding within the time specified by 12 C.F.R. § 1081.400(a). Although negotiations are ongoing, the Parties believe that there is a reasonable chance to resolve this matter without further litigation.

In light of the foregoing, the Parties hereby jointly move for entry of the Proposed Order included as Attachment A.

Respectfully submitted,

/s/ _____

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Attorneys for Consumer Financial Protection Bureau

Attorney for Respondent Auto Cash Leasing, LLC

Certificate of Service

I hereby certify that on the 30th day of November 2016, I caused a copy of the foregoing Joint Motion to Extend Time to Answer the Notice of Charges, along with Attachment A to the Motion, to be filed by electronic transmission (e-mail) with the Office of Administrative Adjudication (CFPB_electronic_filings@cfpb.gov), Administrative Law Judge Christine L. Kirby, and served by email on the Respondents' counsel at the following addresses:

Brian J. Schulman schulmanb@gtlaw.com

| /s/ | |
|---------------|--|
| Amanda Krause | |