

**UNITED STATES OF AMERICA
Before the
CONSUMER FINANCIAL PROTECTION BUREAU**

ADMINISTRATIVE PROCEEDING)	RESPONDENTS' REPLY IN
File No. 2015-CFPB-0029)	SUPPORT OF ITS MOTION
)	FOR LEAVE TO AMEND
In the matter of:)	
)	
INTEGRITY ADVANCE, LLC and)	
JAMES R. CARNES)	
)	

**RESPONDENTS' REPLY IN SUPPORT OF THEIR MOTION FOR
LEAVE TO AMEND RESPONDENTS' LIST OF CONTROVERTED ISSUES OF FACT**

Respondents believe that the Bureau's proposed stipulations at issue here constitute an individual's financial information (or that could reasonably lead to an individual's financial information) and are inappropriate for public filing. Since Respondents believe that such information is more appropriately filed under seal, they seek leave of the Court to amend their filing pending renewed negotiations between the parties regarding the scope of the protective order in this case.

The Joint Stipulated Motion for a Protective Order contemplated that the parties would work "to negotiate an amendment governing the treatment of James R. Carnes's personal financial information." Despite the passing of the March 1 benchmark contained in the stipulated motion, Respondents believe that it remains appropriate for the parties to work to negotiate such an amendment and determine how it should cover the potential disclosure of personal financial information. Pending negotiations with Enforcement Counsel, Respondents ask that the proposed stipulations of fact at issue be allowed to remain under seal.

For the reasons stated above and in Respondents' motion, Respondents respectfully request that the Court grant leave to amend Respondents' List of Controverted Issues of Fact.

Respectfully submitted,

Dated: April 14, 2016

By: Allyson B. Baker

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CERTIFICATION OF SERVICE

I hereby certify that on the 14th 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:

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