

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)
)

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO CFPB'S NOTICE OF CHARGES**

Pursuant to 12 C.F.R. § 1081.205, Respondents Integrity Advance, LLC and James R. Carnes (collectively “Respondents”), respectfully move the Court for an extension of time until and through December 11, 2015, for Respondents to respond to the Consumer Financial Protection Bureau’s (the “Bureau”) Notice of Charges (“Notice”). Good cause exists to grant the requested extension, as counsel requires additional time to review and determine how to respond to the Notice and to prepare such response. In further support of this Motion, Respondents state as follows:

1. On November 18, 2015, the Bureau filed the Notice.
2. Respondents accepted service of the Notice on November 19, 2015 and the Bureau provided courtesy copies of the Notice to counsel via e-mail on November 19, 2015.
3. As of this filing, counsel has not had adequate time to fully evaluate the Bureau’s Notice. The Notice raises complex issues involving administrative law, congressional intent, as well as analysis of the underlying demands and responses thereto. Thus, good cause exists

to grant the requested extension to allow counsel sufficient time to investigate the matters in the Notice, confer with their client about such matters, and then determine how to respond.

4. Pursuant to 12 C.F.R. §1081.201, Respondents' Answer is currently due on December 3, 2015.

5. Respondents request a modest extension of this deadline, making the response due on or before December 11, 2015.

6. Neither party has previously requested an extension of any deadline in this matter.

7. No party will be prejudiced by the requested continuance, and the Bureau does not seek preliminary injunctive or other emergency relief. Granting the extension will not delay resolution of this matter, and will not result in the delay of any scheduled hearings.

8. The Bureau does not oppose the requested extension.

WHEREFORE, Respondents respectfully request that the deadline to respond to the Bureau's Notice be extended up through and including December 11, 2015.

Respectfully submitted,

Dated: November 23, 2015

By: _____ /s/ Allyson B. Baker
Allyson B. Baker, Esq.
Peter S. Frechette, Esq.
Hillary S. Profita, 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 23rd day of November 2015, I caused a copy of the foregoing Unopposed Motion for Extension of Time to be filed by electronic transmission (e-mail) with the Office of Administrative Adjudication (CFPB_electronic_filings@cfpb.gov), the U.S. Coast Guard Hearing Docket Clerk (aljdocketcenter@uscg.mil), 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/ Hillary S. Profita
Hillary S. Profita, Esq.