

1700 G Street NW,
Washington, DC 20552



August 16, 2018

VIA ECF

Hon. Loretta A. Preska
United States District Court Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2220
New York, NY 10007

Re: Consumer Financial Protection Bureau and the People of the State of New York v. RD Legal Funding, LLC; RD Legal Finance, LLC; RD Legal Funding Partners, LP; and Roni Dersovitz

Dear Judge Preska:

The Bureau of Consumer Financial Protection (Bureau) respectfully submits this reply to the defendants' August 15 response to the Bureau's August 10 letter requesting a pre-motion conference with the Court for approval to file a motion under Rule 54(b) for entry of final judgment against the Bureau.

The Bureau appreciates that the defendants do not oppose the Bureau's request for judgment under Rule 54(b). But contrary to the defendants' assertions, the Bureau has not "implicit[ly]" indicated that the New York Attorney General's claims should be stayed during the pendency of the Bureau's appeal. Given the early stage of the proceedings, permitting the Bureau to pursue an immediate appeal would be sufficient to safeguard the Bureau's interests if the Court were to deny the stay request. The Bureau therefore takes no position on defendants' request for a stay.

Very truly yours,

Benjamin Konop
Enforcement Attorney
Bureau of Consumer Financial Protection