

prejudice to Enforcement Counsel arising from Respondents' late-filed witness list and exhibits. Enforcement Counsel estimates that it will submit the supplemental declaration and accompanying attachments by Friday, July 29, 2016. Giving Enforcement Counsel this short time to analyze the exhibits provided by Respondents is appropriate because Enforcement Counsel received these exhibits for the first time on July 21, the morning Dr. Ang testified. Enforcement Counsel did not have sufficient opportunity to prepare its response to Dr. Ang or the new exhibits.

Respectfully submitted,

Attorneys for Plaintiff
Consumer Financial Protection Bureau

ANTHONY ALEXIS
Enforcement Director

DEBORAH MORRIS
Deputy Enforcement Director

CRAIG COWIE
Assistant Litigation Deputy

s/Alusheyi J. Wheeler

Alusheyi J. Wheeler
Wendy J. Weinberg
Vivian W. Chum
1700 G Street NW
Washington, DC 20552
Phone: (202) 435-7786
Facsimile: (202) 435-7722
Email: alusheyi.wheeler@cfpb.gov
Enforcement Counsel

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of July 2016, I caused a copy of the foregoing Enforcement Counsel's Notice of Proposed Remedy to Cure Prejudice 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), Heather L. MacClintock (Heather.L.MacClintock@uscg.mil), and served by email on the Respondents' counsel at the following addresses:

Allyson B. Baker, Esq.
ABBaker@venable.com

Danielle R. Foley, Esq.
DRFoley@venable.com

Peter S. Frechette, Esq.
PSFrechette@venable.com

Hillary S. Profita, Esq.
HSProfit@venable.com

Joanna P. Boyd, Esq.
JPBoyd@venable.com

Christine E. White, Esq.
CEWhite@venable.com

Andrew T. Hernacki, Esq.
ATHernacki@venable.com

/s/ Wendy J. Weinberg
Wendy J. Weinberg