## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA	)
Plaintiff,	) ) ) Circil Action No. 14 or (2
V.	) Civil Action No. 14-cv-62
v.	)
TELECHECK SERVICES, INC., a	) )
Delaware corporation,	)
and	)
TRS RECOVERY SERVICES, INC., a	)
Delaware corporation,	)
	)
Defendants.	)
	)

## MOTION TO ENTER CONSENT DECREE

Plaintiff, the United States of America, hereby requests that this Court enter the Consent Decree that accompanies this Motion. All parties have agreed to the terms of the Consent Decree, as evidenced by their signatures thereon. The government believes that the entry of this Consent Decree would most efficiently further the ends of justice in this case.

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DATED: January 16, 2014

Respectfully submitted,

STUART F. DELERY Assistant Attorney General Civil Division United States Department of Justice

MAAME EWUSI-MENSAH FRIMPONG Deputy Assistant Attorney General Civil Division

MICHAEL S. BLUME Director Consumer Protection Branch

By: s/ Ann F. Entwistle ANN F. ENTWISTLE Trial Attorney Consumer Protection Branch U.S. Department of Justice PO Box 386 Washington, D.C. 20044 Phone: 202-305-3630 Ann.f.entwistle@usdoj.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of January, 2014, the undersigned caused a true and correct copy of the above-entitled MOTION TO ENTER CONSENT DECREE to be served via FedEx upon the following:

Wallace W. Dietz & David R. Esquivel Bass, Berry & Sims PLC 150 Third Avenue South, Suite 2800 Nashville, TN 37201

Michael Goodman Hudson Cook 1020 19th Street, NW, 7th Floor Washington, DC 20036

> <u>s/ Ann F. Entwistle</u> ANN F. ENTWISTLE TRIAL ATTORNEY