

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Bureau of Consumer Financial
Protection,

Plaintiff,

v.

Townstone Financial, Inc. and Barry Sturner,

Defendants.

Case No. 1:20-cv-04176

Judge Franklin U. Valderrama
Magistrate Judge Heather K. McShain

**JOINT RULE 60(B)(6) MOTION FOR RELIEF FROM AND VACATUR OF THE
STIPULATED FINAL JUDGMENT AND ORDER**

Pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Bureau of Consumer Financial Protection (“Bureau”) and Defendant Townstone Financial, Inc. (“Townstone”) jointly move the Court to relieve Townstone from the November 7, 2024 Stipulated Final Judgment and Order, ECF No. 138, and to vacate that Judgment and Order in its entirety. The parties have submitted a proposed Order and respectfully ask that the Court enter it. Upon this Court’s grant of Rule 60(b)(6) relief, all parties to this action stipulate to the dismissal with prejudice of all claims against Townstone and Mr. Sturner pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), (B).

Dated: March 26, 2025.

Respectfully submitted,

**CONSUMER FINANCIAL
PROTECTION BUREAU**

/s/ Mark Paoletta

MARK PAOLETTA (DC Bar # 422746)

Chief Legal Officer

Mark.Paoletta@cfpb.gov

Tel: (771) 959-6080

VICTORIA DORFMAN (DC Bar # 487567)

(NY Bar # 4656625)

Victoria.Dorfman@cfpb.gov

DANIEL SHAPIRO

(FL Bar # 1011108)

Daniel.Shapiro@cfpb.gov

1700 G Street NW

Washington, DC 20552

Attorneys for Plaintiff

**TOWNSTONE FINANCIAL, INC.,
AND BARRY STURNER**

/s/ Steven M. Simpson

STEVEN M. SIMPSON

DC Bar No. 462553

ASHLEY TORKELSON LEVINE

AZ Bar No. 032544

Pacific Legal Foundation

3100 Clarendon Boulevard, Suite 1000

Arlington, VA, 22201

Tel: (202) 888-6881

SSimpson@pacificlegal.org

ALevine@pacificlegal.org

OLIVER J. DUNFORD

FL Bar No. 017991

Pacific Legal Foundation

4440 PGA Boulevard, Suite 307

Palm Beach Gardens, FL 33410

Tel: (916) 503-9060

ODunford@pacificlegal.org

SEAN P. BURKE

RAY BIEDERMAN

Mattingly Burke Cohen & Biederman LLP

155 E. Market St. Suite 400

Indianapolis, IN 46204

MARX DAVID STERBCOW

The Sterbcow Law Group LLC

824 Elmwood Park Boulevard, Suite 205

New Orleans, LA 70123

Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 26, 2025, I electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system, which will cause a copy to be served upon counsel of record.

/s/ Mark Paoletta
MARK PAOLETTA