

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

ACA INTERNATIONAL, LLC;
COLLECTION BUREAU
SERVICES, INC.

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 1:24-cv-03118-DLF

R.M. GALICIA, INC. d/b/a
PROGRESSIVE MANAGEMENT
SYSTEMS,

Plaintiff,

v.

CONSUMER FINANCIAL
PROTECTION BUREAU; and
ROHIT CHOPRA, in his official
capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 1:24-cv-03149-DLF

PARTIES' JOINT STATUS REPORT

The parties in the above-captioned cases submit this Joint Status Report in response to this Court's Minute Order of November 20, 2024 relating to the briefing schedule for the motions for a

temporary restraining order and preliminary injunction filed in these cases.

The Consumer Financial Protection Bureau will revise the applicable date of the Advisory Opinion challenged in these cases to January 2, 2025, 30 days past the current applicable date of December 3, 2024. As noted in the Parties' Amended Joint Statement Re Proposed Briefing Timeline, Defendants' position is that the Advisory Opinion does not itself create any binding legal obligations or create any new obligations that Plaintiffs or their members will need to comply with as of the applicable date. ECF No. 10 ¶ 10. Accordingly, revising the applicable date does not affect regulated entities' obligations.

In consideration of the fact that the Court expressed that it will need to rule on the pending motions for temporary restraining order by December 3, 2024 if that remains the Advisory Opinion's applicable date, and to conserve the Court's resources and allow sufficient time to brief the pending motions for temporary restraining order and preliminary injunction, the Bureau will revise the applicable date to January 2, 2025. It will post a notice revising the applicable date on its website promptly and will also publish that notice in the Federal Register.

Consistent with the Court's guidance at the November 20 teleconference, the parties jointly propose the following briefing schedule on the motions for temporary restraining order and preliminary injunction:

- November 26, 2024: Defendants file combined opposition
- December 2, 2024: Plaintiffs file replies
- If desired by the Court, the parties are available for a hearing at any time convenient for the Court on December 6 or December 9.

Dated: November 21, 2024

Respectfully submitted,

THE CONSUMER FINANCIAL PROTECTION
BUREAU and ROHIT CHOPRA

Seth Frotman
General Counsel
Steven Y. Bressler
Deputy General Counsel

/s/ Kristin Bateman
Kristin Bateman
Assistant General Counsel
Stephanie B. Garlock (D.C. Bar. No. 1779629)
Thomas McCray-Worrall
Attorneys
Consumer Financial Protection Bureau
1700 G Street, NW
Washington, DC 20552
(202) 435-7201 (phone)
(202) 435-7024 (fax)
stephanie.garlock@cfpb.gov

*Counsel for Defendants the Consumer
Financial Protection Bureau and Rohit
Chopra*

ACA INTERNATIONAL, LLC and COLLECTION
BUREAU SERVICES, INC.

By its attorneys,

/s/ Sarah J. Auchterlonie
David B. Meschke, #CO0069
Sarah J. Auchterlonie, #489442 (*oath pending*)
Brownstein Hyatt Farber Schreck, LLP
675 Fifteenth Street, Suite 2900
Denver, CO 80202
Telephone: 303-223-1100
Email: dmeschke@bhfs.com;
sja@bhfs.com

and

Leah Dempsey, #1033593
Brownstein Hyatt Farber Schreck, LLP
1155 F Street, NW
Washington, DC, 20004
Telephone: 202.296.7353
Email: ldempsey@bhfs.com

R.M. GALICIA, INC. d/b/a PROGRESSIVE
MANAGEMENT SYSTEMS

By its attorneys,

/s/ Bryan Shartle

Bryan C. Shartle (pro hac vice)
SESSIONS, ISRAEL & SHARTLE, LLC
3838 N. Causeway Blvd., Suite 2800
Metairie, LA 70002
Phone: (504) 846-7917
Email: bshartle@sessions.legal