

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

Consumer Financial Protection Bureau,

Plaintiff,

v.

FirstCash, Inc., *et al.*,

Defendants.

Civil Action No. 4:21-cv-1251-P

**JOINT MOTION FOR STAY AND EXTENSION**

Plaintiff the Consumer Financial Protection Bureau (Bureau) and Defendants FirstCash, Inc., *et al.* (FirstCash) jointly submit this motion for a 60-day stay of discovery and extension of all deadlines. The parties so request to allow the parties to focus on ongoing settlement discussions and, if warranted, an additional in-person mediation in Fort Worth.

The Court's March 20, 2025 Order, ECF No. 126, directed the parties to submit a joint report and proposed amended scheduling order by April 3, 2025. Both before and since that Order, the parties have engaged in settlement discussions aimed at resolving this litigation and preserving judicial and party resources. To allow those discussions to run their full course, the parties request that this Thursday's deadline be extended for 60 days, until June 2, 2025. During that 60-day period, the parties intend to continue their settlement discussions and engage with the Court-assigned mediator, the Hon. David L. Evans, including potentially to request a second in-person mediation in Fort Worth. By June 2, 2025, the parties will either notify the Court of a potential resolution or submit a proposed schedule for the remainder of discovery and a trial of this matter.

Dated: April 1, 2025

s/Jacob A. Schunk  
Jacob A. Schunk (IA AT001908)  
Benjamin Buchholz (DC Bar No. 1780676)  
Michael J. Wadden (NY Bar No. 5577903)  
Enforcement Attorneys  
Consumer Financial Protection Bureau  
1700 G Street, NW  
Washington, DC 20552  
Telephone (Schunk): 202-718-0934  
Fax: 703-642-4585  
jacob.schunk@cfpb.gov

*Attorneys for the Consumer Financial Protection  
Bureau*

Dated: April 1, 2025

s/Michael J. Agoglia  
Michael J. Agoglia  
Alix Allison  
Texas State Bar No. 24086261  
VARTABEDIAN, HESTER & HAYNES  
301 Commerce Street, Suite 3635  
Fort Worth, TX 76102  
Telephone: 817-214-4973

alix.allison@vhh.law

Michael J. Agoglia  
California State Bar No. 154810  
Tania Kazi  
California State Bar No. 294387  
ALSTON & BIRD LLP  
560 Mission Street, Suite 2100  
San Francisco, CA 94105-0912  
Telephone: 415-243-1011  
Facsimile: 415-243-1001  
michael.agoglia@alston.com  
tania.kazi@alston.com

*Attorneys for Defendants*