

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

MAYOR AND CITY COUNCIL OF
BALTIMORE, et al.,

Plaintiffs,

vs.

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.,

Defendants.

Case No. 25-cv-458-ABA

JOINT MOTION FOR BRIEFING SCHEDULE

On February 12, 2025, Plaintiffs Mayor and City Council of Baltimore and Economic Action Maryland Fund filed a complaint (ECF No. 1) and motion for a temporary restraining order (ECF No. 8) asking this Court to enjoin the Consumer Financial Protection Bureau and its Acting Director Russell Vought from taking any steps to defund the Consumer Financial Protection Bureau, including by transferring the Bureau's reserve funds or otherwise using them for a purpose other than the operation of the Bureau, until this Court can further consider the merits of the case.

Since this filing, the Parties have conferred and come to an agreement to enable entry of a stipulated briefing schedule that converts plaintiffs' pending motion for a temporary restraining order into a motion for a preliminary injunction. Specifically, Defendant Consumer Financial Protection Bureau and Defendant Russell Vought agree that, for a period of time beginning with the filing of this Joint Motion, and expiring at 9:00 a.m. Eastern, on Friday, February 28, 2025, or upon entry of a contrary order by this Court, Defendants, their officers, agents, servants, employees, and attorneys will not:

- Transfer money from the Bureau’s reserve funds, other than to satisfy the ordinary operating obligations of the Bureau;
- Relinquish control or ownership of the Bureau’s reserve funds nor grant control or ownership of the Bureau’s reserve funds to any other entity;
- Return any money from the Bureau’s reserve funds to the Federal Reserve or the Department of Treasury; or
- Otherwise take steps to reduce the amount of money available to the Bureau below the amount available as of February 13, 2025 other than to satisfy the ordinary operating obligations of the Bureau.

Defendants agree that the above commitments are made by the Acting Director of the Consumer Financial Protection Bureau, in his official capacity, and therefore will be commitments honored for the same term of time by any successor occupying that office, including any officer otherwise exercising the powers of Director of the Consumer Financial Protection Bureau prior to 9:00 a.m. Eastern on Friday, February 28.

In reliance on Defendants’ assurances, the parties jointly move to convert Plaintiffs’ pending motion for a temporary restraining order to a motion for a preliminary injunction, with a briefing schedule that would enable this Court to rule before 9:00 a.m. Eastern on Friday, February 28 as follows:

1. Defendants to file an opposition to the motion for a preliminary injunction (ECF No. 8, styled as “Plaintiffs’ Motion for a Temporary Restraining Order”) by February 20, 2025.

2. Plaintiffs to file a reply in support of the motion for a preliminary injunction (ECF No. 8, styled as “Plaintiffs’ Motion for a Temporary Restraining Order”) by February 25, 2025.

The parties are available at any time on February 26 or 27 should the Court wish to hold a hearing on Plaintiffs’ Motion.

Dated: February 13, 2025

Respectfully submitted,

/s/ Mark B. Samburg

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**Pro hac vice application pending*

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**[PROPOSED] ORDER GRANTING
JOINT MOTION FOR BRIEFING SCHEDULE**

Upon consideration of the parties' joint motion for briefing schedule, it is hereby

ORDERED that the motion is **GRANTED**; it is further

ORDERED that this Court shall construe Plaintiffs' motion for a temporary restraining order (ECF 8) as one for preliminary injunction; it is further

ORDERED that Defendants shall file an opposition to that motion by no later than February 20, 2025; it is further

ORDERED that Plaintiffs shall file a reply, if any, by no later than February 25, 2025; it is further

ORDERED that the parties shall appear for a hearing on that motion on February [DATE], 2025, at [TIME]; it is further

ORDERED that for a period of time beginning with the entry of this Order, and expiring at 9:00 a.m. Eastern on February 28, 2025, or upon entry of a contrary order by this Court, Defendants, their officers, agents, servants, employees, and attorneys will not:

(1) transfer money from the Consumer Financial Protection Bureau's reserve funds, other than to satisfy the ordinary operating obligations of the Bureau; (2) relinquish control or ownership of the Bureau's reserve funds nor grant control or ownership of the Bureau's reserve funds to any other entity; (3) return any money from the Bureau's reserve funds to the Federal Reserve or the Department of Treasury; or (4) otherwise take steps to reduce the amount of money available to the Bureau below the amount available as of February 13, 2025, other than to satisfy the ordinary operating obligations of the Bureau; and it is further

ORDERED that those obligations apply to any successor occupying Acting Director Vought's position, including any officer otherwise exercising the powers of the Director of the Consumer Financial Protection Bureau.

SO ORDERED.

Dated: February ____, 2025

THE HON. ADAM B. ABELSON
UNITED STATES DISTRICT JUDGE