

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

CHAMBER OF COMMERCE OF
THE UNITED STATES OF
AMERICA; FORT WORTH
CHAMBER OF COMMERCE;
LONGVIEW CHAMBER OF
COMMERCE; AMERICAN
BANKERS ASSOCIATION;
CONSUMER BANKERS
ASSOCIATION; and TEXAS
ASSOCIATION OF BUSINESS,

Plaintiffs,

v.

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

Defendants.

Case No.: 4:24-cv-213-P

DEFENDANTS' MOTION TO TRANSFER

Defendants the Consumer Financial Protection Bureau and Rohit Chopra (collectively, the Bureau) respectfully move to transfer this case to the United States District Court for the District of Columbia. As the Bureau explains in its accompanying brief, this case should be transferred under 28 U.S.C. § 1404 because Washington, D.C. is a better venue for resolving a dispute over a regulation promulgated in D.C that directly affects only large credit card issuers—none of which are based in this Division—than the Fort Worth Division of the Northern District of Texas.

DATED: March 21, 2024

Respectfully Submitted,

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General Counsel

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/s/ Stephanie B. Garlock
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Chopra*

CERTIFICATE OF CONFERENCE

I hereby certify that on March 19, 2024, I communicated by email with counsel for Plaintiffs, who indicated that Plaintiffs oppose the motion to transfer to the U.S. District Court for the District of Columbia.

/s/ Stephanie B. Garlock
STEPHANIE B. GARLOCK

CERTIFICATE OF SERVICE

I hereby certify on March 21, 2024, a true and correct copy of this document was served electronically by the Court's CM/ECF system to all counsel of record.

/s/ Stephanie B. Garlock
STEPHANIE B. GARLOCK