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' NOTICE OF INTENTION TO FILE MOTION TO TRANSFER

On March 18, 2024, this Court ordered expedited briefing regarding venue, given its "concerns regarding whether the Fort Worth Division of the Northern District of Texas is the correct venue to hear this lawsuit." *See* Order, ECF No. 45. In the alternative, the Court invited Defendants to move to transfer venue, and asked Defendants to give notice of their intention to do so by 5:00 PM on March 19, 2024. Defendants the Consumer Financial Protection Bureau and Rohit Chopra hereby give notice that they intend to move to transfer this case and will file such a motion by 5:00 PM on Thursday, March 21, 2024, as directed in the Court's recent order.

DATED: March 19, 2024

Respectfully Submitted,

SETH FROTMAN
General Counsel

STEVEN Y. BRESSLER Deputy General Counsel

KRISTIN BATEMAN
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/s/ Stephanie B. Garlock
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^{*}Admitted pro hac vice

^{**}Pro hac vice application forthcoming

CERTIFICATE OF SERVICE

I hereby certify on March 19, 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