

**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 DISMISS THE FORT WORTH CHAMBER OF
COMMERCE FOR LACK OF STANDING AND TRANSFER THIS CASE
TO THE U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA**

Defendants the Consumer Financial Protection Bureau and Rohit Chopra (collectively, the Bureau) respectfully move to dismiss Plaintiff the Fort Worth Chamber of Commerce for lack of standing and, accordingly, transfer this case and the remaining Plaintiffs to a court where venue is proper. As the Bureau explains in its accompanying brief, the Fort Worth Chamber of Commerce cannot satisfy the test for associational standing laid out in *Hunt v. Washington State Apple Advertising Commission*, 432 U.S. 333, 343 (1977), and its continued participation in this case threatens to stretch the associational standing doctrine beyond its constitutional limits.

Accordingly, the Court should dismiss the Fort Worth Chamber of Commerce from this action. Once the Fort Worth Chamber is dismissed from this case, Plaintiffs cannot establish that venue is proper in the Northern District of Texas—because no remaining Plaintiff resides here, and because a substantial part of the events or omissions giving rise to the suit did not occur here. Accordingly, the Court should then transfer this case under 28 U.S.C. § 1406 to the U.S. District Court for the District of Columbia, or in the alternative should dismiss the case entirely.

DATED: July 29, 2024

Respectfully Submitted,

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/s/ Stephanie B. Garlock
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Chopra*

CERTIFICATE OF CONFERENCE

I hereby certify that on July 26 and 29, 2024, I communicated by email with counsel for Plaintiffs, who indicated that Plaintiffs oppose the foregoing motion.

/s/ Stephanie B. Garlock
STEPHANIE B. GARLOCK

CERTIFICATE OF SERVICE

I hereby certify on July 29, 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