

**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' RENEWED MOTION TO TRANSFER UNDER 28 U.S.C. § 1404  
AND MOTION TO DISMISS OR TRANSFER UNDER 28 U.S.C. § 1406**

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, or to dismiss the case entirely. As the Bureau explains in its accompanying brief, the Court should transfer this case 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 or District—than the Fort Worth Division of the Northern District of Texas. In the alternative, the Court should dismiss or transfer this case

under 28 U.S.C. § 1406 because Plaintiffs have not established that venue is proper in this District in the first place.

DATED: May 28, 2024

Respectfully Submitted,

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/s/ Stephanie B. Garlock  
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*Counsel for Defendants the Consumer  
Financial Protection Bureau and Rohit  
Chopra*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on May 28, 2024, I communicated by email with counsel for Plaintiffs Michael Murray, who indicated that Plaintiffs oppose the motion to dismiss or transfer.

/s/ Stephanie B. Garlock  
STEPHANIE B. GARLOCK

**CERTIFICATE OF SERVICE**

I hereby certify on May 28, 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