

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

ACA INTERNATIONAL, LLC;  
COLLECTION BUREAU  
SERVICES, INC.

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION  
BUREAU; and RUSSELL T. VOUGHT,<sup>1</sup> in  
his official capacity as Acting Director of the  
Consumer Financial Protection Bureau,

Defendants.

Case No. 1:24-cv-03118-DLF

R.M. GALICIA, INC. d/b/a  
PROGRESSIVE MANAGEMENT  
SYSTEMS,

Plaintiff,

v.

CONSUMER FINANCIAL PROTECTION  
BUREAU; and RUSSELL T. VOUGHT, in  
his official capacity as Acting Director of the  
Consumer Financial Protection Bureau,

Defendants.

Case No. 1:24-cv-03149-DLF

**JOINT MOTION TO STAY**

Plaintiffs in the above-captioned actions filed their respective complaints challenging an Advisory Opinion on medical debt collection issued by Defendant the Consumer Financial Protection Bureau (“Bureau”) on October 1, 2024. *See* Debt Collection Practices (Regulation F);

---

<sup>1</sup> Under Federal Rule of Civil Procedure 25(d), Acting Director Russell T. Vought is automatically substituted as a party for his predecessor in office.

Deceptive and Unfair Collection of Medical Debt, 89 Fed. Reg. 80715 (Oct. 4, 2024) (“Advisory Opinion”). The Bureau is planning to revoke the Advisory Opinion. To allow time for the Bureau to do so, the parties jointly request that the Court stay this litigation until the Advisory Opinion is revoked. The Bureau proposes to provide a status report to the Court by July 14, and every 30 days thereafter, regarding its progress toward revocation.

“A district court has ‘broad discretion to stay proceedings as an incident to its power to control its docket.’” *Nat’l PFAS Contamination Coal. v. EPA*, No. CV 22-132 (JDB), 2023 WL 22078, at \*3 (D.D.C. Jan. 3, 2023) (quoting *Clinton v. Jones*, 520 U.S. 681, 706 (1997)). A trial court may enter a stay where “it is efficient for its own docket and the fairest course for the parties” to do so. *Id.* (quoting *Hisler v. Gallaudet Univ.*, 344 F. Supp. 2d 29, 35 (D.D.C. 2004)).

Here, the Bureau’s revocation of the Advisory Opinion will moot the issues raised by Plaintiffs in their respective cases. Staying this matter to allow the Bureau time to revoke the Advisory Opinion is appropriate to preserve the Court’s and the parties’ time. *Cf. id.* at \*5 (“When an agency has a defined plan to promulgate a rule that would resolve the case and thereby save judicial resources, it is often proper for courts to stay proceedings while rulemaking proceeds.”). Accordingly, the parties request that the Court stay this matter until the Advisory Opinion is revoked and order that the Bureau provide a status report regarding its progress toward revocation by July 14, and every 30 days thereafter.

Dated: April 11, 2025

Respectfully submitted,

Steven Y. Bressler  
*Deputy General Counsel*  
Christopher Deal  
*Assistant General Counsel*

/s/ Thomas McCray-Worrall  
Thomas McCray-Worrall  
*Senior Counsel*

Consumer Financial Protection Bureau  
1700 G Street, NW  
Washington, DC 20552  
(202) 435-9683 (phone)  
(202) 435-7024 (fax)  
thomas.mccray-worrall@cfpb.gov

*Counsel for Defendants the Consumer  
Financial Protection Bureau and Russell T. Vought*

ACA INTERNATIONAL, LLC and  
COLLECTION BUREAU SERVICES, INC.

By its attorneys,

/s/ Sarah J. Auchterlonie

David B. Meschke, #CO0069  
Sarah J. Auchterlonie, #489442  
Brownstein Hyatt Farber Schreck, LLP  
675 Fifteenth Street, Suite 2900  
Denver, CO 80202  
Telephone: 303-223-1100  
Email: dmeschke@bhfs.com;  
sja@bhfs.com

and

Leah Dempsey, #1033593  
Brownstein Hyatt Farber Schreck, LLP  
1155 F Street, NW  
Washington, DC, 20004  
Telephone: 202.296.7353  
Email: ldempsey@bhfs.com

R.M. GALICIA, INC. d/b/a PROGRESSIVE  
MANAGEMENT SYSTEMS

By its attorneys,

/s/ Bryan Shartle

Bryan C. Shartle (pro hac vice)  
SESSIONS, ISRAEL & SHARTLE, LLC  
3838 N. Causeway Blvd., Suite 2800  
Metairie, LA 70002  
Phone: (504) 846-7917  
Email: bshartle@sessions.legal