

**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,

**SETH FROTMAN**  
*General Counsel*

STEVEN Y. BRESSLER  
*Deputy General Counsel*

KRISTIN BATEMAN  
*Assistant General Counsel*

/s/ Stephanie B. Garlock  
STEPHANIE B. GARLOCK\*  
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D.C. Bar No. 1779629

JUSTIN M. SANDBERG\*  
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Financial Protection Bureau and Rohit  
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