

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

CORNERSTONE CREDIT UNION
LEAGUE and CONSUMER DATA
INDUSTRY ASSOCIATION,

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU and RUSSELL VOUGHT in his
official capacity as Acting Director of the
CFPB,

Defendants.

Civil Action No. 4:25-cv-00016-SDJ

**JOINT MOTION TO GRANT INTERVENTION, DELAY THE EFFECTIVE DATE OF
THE MEDICAL DEBT RULE, AND SET BRIEFING SCHEDULE**

In response to this Court's April 30, 2025 order (ECF 32), Defendants Consumer Financial Protection Bureau and Russell Vought, Plaintiffs Cornerstone Credit Union League and Consumer Data Industry Association, and Proposed Defendant-Intervenors David Deeds, Harvey Coleman, Tzedek DC, and New Mexico Center on Law and Poverty jointly move the Court to: (i) grant Proposed Intervenors' motion to intervene (ECF 26), (ii) further stay the effective date of the challenged Medical Debt Rule for a brief period, and (iii) set a briefing schedule that would allow the Intervenors to submit their responses to the proposed consent judgment and preliminary injunction motion and give Plaintiffs and Defendants an opportunity to reply.

In support of this motion, Plaintiffs, Defendants, and Proposed Intervenors (collectively the "Parties") state the following:

1. Pending before this Court are Plaintiffs' Motion for a Preliminary Injunction (ECF 9), Proposed Intervenor's Motion to Intervene (ECF 26), and Plaintiffs and Defendants' Joint Motion to Approve Consent Judgment (ECF 31).

2. The Parties agree that the Motion to Intervene should be granted, and David Deeds, Harvey Coleman, Tzedek DC, and New Mexico Center on Law and Poverty should be permitted to intervene.¹

3. On February 6, 2025, and pursuant to 5 U.S.C. § 705, this Court stayed until June 15 the effective date of the challenged Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (Regulation V), 90 Fed. Reg. 3276 (Jan. 14, 2025) ("Medical Debt Rule"). At that time, 39 days remained before the effective date of the Medical Debt Rule. The Parties agree and request that the effective date of the rule continue to be stayed under 5 U.S.C. § 705 until 39 days after this Court rules on Plaintiffs' Motion for a Preliminary Injunction.

4. The Parties agree to the following briefing schedule:

- The Intervenor's response in opposition to the Joint Motion to Approve Consent Judgment and the Motion for Preliminary Injunction will be due on the later of May 21, 2025, or fourteen days after the Court rules on this Joint Motion to Grant Intervention, Delay the Effective Date of the Medical Debt Rule, and Set Briefing Schedule.
- Plaintiffs' and Defendants' replies in support of their Joint Motion to Approve Consent Judgment and Plaintiffs' Motion for Preliminary Injunction will be due on the later of May 30, 2025, or seven days after Intervenor's opposition is filed.

¹ The Parties met, conferred, and reached this agreement in order to expedite a resolution on the merits and streamline disputed issues.

5. As specified above, the Parties respectfully request that the Court enter an order granting Proposed Intervenor's Motion to Intervene for the above-stated purposes, further staying the effective date of the Medical Debt Rule until 39 days after the Court rules on Plaintiffs' Motion for a Preliminary Injunction, and setting the proposed briefing schedule.

6. The Parties also request that the Court set a hearing date on Plaintiffs' and Defendants' Joint Motion to Approve Consent Judgment (ECF 31) and Plaintiffs' Motion for Preliminary Injunction (ECF 9) for as soon as is practicable.

DATED: May 6, 2025

Respectfully Submitted,

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Counsel for Proposed Intervenors

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for all parties and the Proposed Intervenors have complied with the meet and confer requirement in Local Rule CV-7(h), and this motion is unopposed—the parties and the Proposed Intervenors file this motion jointly.

/s/ Alex More

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this Motion was filed electronically through the Court's ECF system.

/s/ Alex More

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

CORNERSTONE CREDIT UNION	§	
LEAGUE and CONSUMER DATA	§	
INDUSTRY ASSOCIATION,	§	
	§	CIVIL NO. 4:25-cv-00016
v.	§	
	§	
CONSUMER FINANCIAL	§	
PROTECTION BUREAU and	§	
RUSSELL VOUGHT in his official	§	
capacity as Acting Director of the	§	
CFPB	§	

ORDER

Before the Court is a Joint Motion to Grant Intervention, Further Delay the Effective Date of the Medical Debt Rule, and Set Briefing Schedule (Dkt. #33), filed by Plaintiffs Cornerstone Credit Union League and Consumer Data Industry Association, Defendants Consumer Financial Protection Bureau and Russell Vought, and Proposed Intervenors David Deeds, Harvey Coleman, Tzedek DC, and New Mexico Center on Law and Poverty.

Having considered the motion, it is **ORDERED** that Proposed Intervenors' Motion to Intervene (Dkt. #26) is **GRANTED**.

It is also hereby **ORDERED** that the effective date of the Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (Regulation V), 90 Fed. Reg. 3276 (Jan. 14, 2025), is **STAYED** pursuant to 5 U.S.C. § 705 until 39 days after this Court rules on Plaintiffs' Motion for a Preliminary Injunction (Dkt. #9).

Intervenors are **ORDERED** to submit their responses to the pending Joint Motion to Approve Consent Judgment (Dkt. #31) and Plaintiffs' Motion for Preliminary Injunction (Dkt. #9) by May 21, 2025, or fourteen days after the date of this order (whichever is later).

Plaintiffs and Defendants are **ORDERED** to submit reply briefs in support of their Joint Motion to Approve Consent Judgment (Dkt. #31) and Plaintiffs' Motion for Preliminary Injunction (Dkt. #9) by May 30, 2025, or seven days after Intervenors' opposition (whichever is later).

It is further **ORDERED** that a hearing on Plaintiffs' and Defendants' Joint Motion to Approve Consent Judgment (Dkt. #31) and Plaintiffs' Motion for Preliminary Injunction (Dkt. #9) is scheduled for _____, at _____, at the United States Courthouse located at 7940 Preston Road, Courtroom 105, Plano, Texas.

So ORDERED and SIGNED on this __ day of _____ .

SEAN D. JORDAN
UNITED STATES DISTRICT JUDGE