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,[1] 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);

[1] 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,

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