

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

ACA INTERNATIONAL and SPECIALIZED COLLECTION  
SYSTEMS, INC.

*Plaintiffs,*

v.

CONSUMER FINANCIAL PROTECTION BUREAU and the  
Acting Director of the Consumer Financial Protection Bureau,  
1700 G. St. NW, Washington, DC  
20552

*Defendants.*

No. 4:25-CV-00094

**PROPOSED DEFENDANT-INTERVENORS'  
NOTICE OF OPPOSITION TO EXTENDED STAY**

Proposed Defendant-Intervenors hereby notify the Court that they oppose an extension of the stay in this matter because *Cornerstone Credit Union League v. Consumer Financial Protection Bureau*, No. 4:25-cv-00016-SDJ (E.D. Tex.), involves different plaintiffs, the legal claims are not entirely the same, that case has no primacy over this one, and there is no certainty about the timing of when such a decision in that case would be entered. Further, that case will not necessarily moot this case, as Plaintiffs presumably believed when they filed this action notwithstanding the slightly earlier filing of the *Cornerstone* case. By proposing the stay of this litigation without dismissing it, the parties appear to seek two bites at the apple by only pursuing this action if the Medical Debt Rule is upheld in *Cornerstone*. Proposed Defendant-Intervenors thus oppose the stay to avoid further delays in implementation of the Medical Debt Rule.

Dated: May 14, 2025

Respectfully submitted:

/s/ Chi Chi Wu

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Chi Chi Wu\*

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**CERTIFICATE OF SERVICE**

I certify that on May 14, 2025, the foregoing document was filed on the Court's CM/ECF system which sent notification of such filing to all counsel of record.

/s/ Chi Chi Wu