

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS

RYAN, LLC,

Plaintiff,

CHAMBER OF COMMERCE OF  
THE UNITED STATES OF  
AMERICA, BUSINESS  
ROUNDTABLE, TEXAS  
ASSOCIATION OF BUSINESS,  
and LONGVIEW CHAMBER OF  
COMMERCE

Plaintiff-Intervenors,

v.

FEDERAL TRADE COMMISSION,

Defendant.

Civil Action No. 3:24-cv-986-E

**JOINT STATUS REPORT**

Plaintiff Ryan LLC; Plaintiff-Intervenors Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce; and Defendant Federal Trade Commission hereby respond to the Court's July 3, 2024, order to submit a Joint Status Report including a proposed briefing schedule that will enable the Court to enter a merits disposition in this action on or before August 30, 2024.

Plaintiff, Plaintiff-Intervenors, and Defendant have conferred and agree that Defendant will not file a responsive pleading, and that Plaintiff and Plaintiff-Intervenors do not anticipate a need to amend their complaints. In addition, the parties do not believe it necessary to file statements of undisputed material facts with their summary judgment motions, and request that the Court waive that requirement, although the parties do not waive the opportunity to dispute any facts in the event of a material dispute. However, despite good-faith efforts, the parties have been unable to reach agreement on a proposed schedule for merits briefing. The parties' respective positions are set forth below.

**Plaintiff/Plaintiff-Intervenors' Position:** Plaintiff and Plaintiff-Intervenors propose that the parties simultaneously file their motions for summary judgment on July 26, 2024, and their opposition briefs on August 9, 2024. Defendant would file a single consolidated opposition to Plaintiff and Plaintiff-Intervenors' motions for summary judgment. The parties would not file reply briefs. This schedule best provides the parties with sufficient time to prepare their briefs and for the Court to enter its merits disposition on or before August 30, 2024. This schedule is also the most efficient for the Court. The parties' motions for summary judgment will address the same questions of law, all of which were extensively briefed at the preliminary-injunction stage. Accordingly, each party is prepared to address the

relevant arguments in their opening briefs supporting the motions for summary judgment.

<b>Event</b>	<b>Deadline</b>	<b>Word Limit</b>
Plaintiff's and Plaintiff-Intervenors' motions for summary judgment	July 26, 2024	10,000 each
Defendant's motion for summary judgment	July 26, 2024	10,000
Plaintiff's and Plaintiff-Intervenors' oppositions to Defendant's motion for summary judgment	August 9, 2024	5,000 each
Defendant's consolidated opposition to Plaintiff's and Plaintiff-Intervenors' motions for summary judgment	August 9, 2024	7,500
Joint appendix	August 16, 2024	N/A

**Defendant's Proposal:**

Defendant proposes that Plaintiff and Plaintiff-Intervenors file their motions for summary judgment by July 19, 2024; Defendant file its consolidated cross-motion for summary judgment and opposition to Plaintiff's and Plaintiff-Intervenors' motions for summary judgment by July 26, 2024; Plaintiff and Plaintiff-Intervenors file their consolidated oppositions to Defendant's motion for summary judgment and replies in support of Plaintiff's and Plaintiff-Intervenors' motions for summary judgment by August 9, 2024; and Defendant file its reply in support of its motion for summary judgment by August 16, 2024. This schedule best facilitates

the Court's consideration of the parties' motions for summary judgment by facilitating the parties' meaningful engagement with one another's arguments in consecutive briefs. It also provides the parties with the opportunity to reply contemplated by the Court's Local Rules. *See* L.R. 7.1(f). Additionally, to afford Defendant a meaningful opportunity to respond to the arguments raised by both Plaintiff and Plaintiff-Intervenors, Defendant respectfully requests that the Court adopt the same word limit for Defendant's briefs as the combined word limit for Plaintiff and Plaintiff-Intervenors' briefs.

<b>Event</b>	<b>Deadline</b>	<b>Word Limit</b>
Plaintiff's and Plaintiff-Intervenors' motions for summary judgment	July 19, 2024	10,000 each
Defendant's consolidated cross-motion for summary judgment and opposition to Plaintiff's and Plaintiff-Intervenors' motions for summary judgment	July 26, 2024	20,000
Plaintiff's and Plaintiff-Intervenors' consolidated oppositions to Defendant's motion for summary judgment and replies in support of Plaintiff's and Plaintiff-Intervenors' motions for summary judgment	August 9, 2024	5,000 each
Defendant's reply in support of its motion for summary judgment	August 16, 2024	10,000
Joint appendix	August 20, 2024	N/A

Although Defendant does not currently anticipate a need for fact discovery, adjustment to the briefing schedule may be warranted in the event that such need arises.

Respectfully submitted,

Dated: July 9, 2024

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