

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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.*

**Case No. 3:24-cv-986-E**

**PLAINTIFF AND PLAINTIFF-INTERVENORS'  
NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff and plaintiff-intervenors respectfully request that the Court take notice of a recent order and transcript opinion issued in *Properties of the Villages, Inc. v. FTC*, No. 5:24-cv-316-TJC-PRL (M.D. Fla. Aug. 15, 2024). *See* Exhibit A. The plaintiff in that case challenged the Noncompete Rule under the Administrative Procedure Act and moved for a preliminary injunction limited to the parties to the case. Earlier today, the court granted that request and issued an order preliminarily

enjoining the Commission from enforcing the Rule against the plaintiff based on its determination that the Rule likely exceeds the Commission's statutory authority.

Dated: August 15, 2024

Respectfully submitted,

Jordan L. Von Bokern (D.C. Bar No. 1032962)  
Tyler S. Badgley (D.C. Bar No. 1047899)  
U.S. CHAMBER LITIGATION CENTER  
1615 H Street NW  
Washington, D.C. 20062  
Tel: (202) 463-5337  
jvonbokern@uschamber.com  
tbadgley@uschamber.com

Liz Dougherty (D.C. Bar No. 457352)  
BUSINESS ROUNDTABLE  
1000 Maine Avenue SW  
Washington, D.C. 20024  
202-872-1260  
ldougherty@brt.org

/s/ Robert L. Sayles  
Robert L. Sayles (Texas Bar No. 24049857)  
Boyce Holleman (Texas Bar No. 24126727)  
BRADLEY ARANT BOULT CUMMINGS LLP  
1445 Ross Avenue  
Suite 3600  
Dallas, TX 75202  
Tel: (214) 257-9800  
Fax: (214) 939-8787  
rsayles@bradley.com  
bholleman@bradley.com

Jeffrey B. Wall (Georgia Bar No. 750427)  
Judson O. Littleton (D.C. Bar No. 1027310)  
SULLIVAN & CROMWELL LLP  
1700 New York Avenue, N.W.  
Washington, D.C. 20006-5215  
Tel: (202) 956-7000  
wallj@sullcrom.com  
littletonj@sullcrom.com

*Counsel for Plaintiff-Intervenors  
Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce*

Allyson N. Ho  
Texas Bar No. 24033667  
Elizabeth A. Kiernan  
Texas Bar No. 24105666  
GIBSON, DUNN & CRUTCHER  
LLP  
2001 Ross Avenue, Suite 2100  
Dallas, TX 75201  
Telephone: 214.698.3100  
Facsimile: 214.571.2900  
aho@gibsondunn.com  
ekiernan@gibsondunn.com

Charles W. Fillmore  
Texas Bar No. 00785861  
H. Dustin Fillmore III  
Texas Bar No. 06996010  
THE FILLMORE LAW FIRM LLP  
201 Main Street, Suite 700  
Fort Worth, TX 76102  
Telephone: 817.332.2351  
chad@fillmorefirm.com  
dusty@fillmorefirm.com

/s/ Allyson H. Ho  
Eugene Scalia (*pro hac vice*)  
Amir C. Tayrani (*pro hac vice*)  
Andrew G. I. Kilberg (*pro hac vice*)  
Aaron Hauptman (*pro hac vice*)  
Joshua R. Zuckerman (*pro hac vice*)  
GIBSON, DUNN & CRUTCHER  
LLP  
1050 Connecticut Avenue, N.W.  
Washington, DC 20036  
Telephone: 202.955.8500  
Facsimile: 202.467.0539  
escalia@gibsondunn.com  
atayrani@gibsondunn.com  
akilberg@gibsondunn.com  
ahauptman@gibsondunn.com  
jzuckerman@gibsondunn.com

*Counsel for Ryan, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 15, 2024, I electronically transmitted the attached document to the Clerk of the Court and all counsel of record using the ECF System for filing and service in accordance with Local Rule 5.1.

/s/ Robert L. Sayles  
Robert L. Sayles