

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

RYAN, LLC,

*Plaintiff,*

v.

FEDERAL TRADE COMMISSION,

*Defendant.*

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

**UNOPPOSED MOTION TO INTERVENE AS PLAINTIFFS**

Pursuant to Federal Rule of Civil Procedure 24(a)(2), The Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce (intervenors) respectfully move to intervene as plaintiffs as of right in the above-captioned proceeding. Alternatively, intervenors respectfully move the Court for permission to intervene as plaintiffs pursuant to Federal Rule of Civil Procedure 24(b). Intervenors' contentions of fact and law, and arguments and authorities, are set forth in intervenors' Brief In Support of Unopposed Motion To Intervene As Plaintiffs, filed contemporaneously with the filing of this motion.

Neither Plaintiff nor Defendant opposes intervenors' intervention in this case. However, as set forth below and in the attached brief, intervenors and Defendant

have differing views on the impact (or lack thereof) that intervention should have on the existing scheduling order.

Dated: May 8, 2024

Respectfully submitted,

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

### **CERTIFICATE OF WORD COUNT**

This Unopposed Motion to Intervene complies with the Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, Rule II(A), because it contains 137 words.

/s/Robert L. Sayles

Robert L. Sayles

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1(b), I hereby certify that counsel for Intervenors conferred with Eugene Scalia and other counsel for plaintiff regarding Intervenors' intention to file this motion. Plaintiff's counsel stated that Plaintiff is unopposed to the relief requested herein. I further certify that I conferred with Rachael L. Westmoreland and other counsel for Defendant regarding Intervenors' intention to file this motion. Defendant's counsel stated that Defendant does not oppose Intervenors' request for intervention to the extent that it will not prejudice Defendant, but that Defendant opposes Intervenors' suggestion that, if intervention is granted, Intervenors' anticipated motion for preliminary relief could be resolved on the same briefing schedule recently entered by the Court on Plaintiff's motion to

stay. Defendant's position is fully set forth in Part C of in the attached brief in support of this motion.

/s/ Judson O. Littleton  
Judson O. Littleton  
*Counsel for Movants*

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 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

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

**[PROPOSED] ORDER GRANTING INTERVENORS' UNOPPOSED  
MOTION TO INTERVENE AS PLAINTIFFS**

Before the Court is the Chamber of Commerce of the United States of America, Business Roundtable, Texas Association of Business, and Longview Chamber of Commerce's (intervenors') Unopposed Motion to Intervene as Plaintiffs. The Court, having considered the arguments and evidence of the parties, is of the opinion that intervenors' motion should be **GRANTED**.

The Court finds that intervenors' motion is timely, they have an interest in the subject of the action, the disposition of this action may impair or impede their interest, and their interest may be inadequately represented by the existing parties. The Court further finds that intervenors have a claim that shares a common question

of law or fact with this action and that permitting intervention will not unduly delay or prejudice the adjudication of the original parties' rights.

It is therefore **ORDERED** that intervenors' Motion to Intervene as Plaintiffs is hereby **GRANTED**.

**SO ORDERED.**

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DATE

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Hon. Judge Ada E. Brown,  
United States Federal District Judge