

Comment from Consumer Financial Protection Bureau on *Choice of Forum*
April 18, 2024

General: In addition to these issues, CFPB would also be interested in discussing issues around associational standing and related issues that are interacting with venue.

On Recommendation 2: CFPB would encourage ACUS to consider expressly endorsing the Judicial Conference policy, as this endorsement could have more of an impact than legislative recommendations.

Has ACUS considered either the Gregg Costa (<https://harvardlawreview.org/blog/2018/01/an-old-solution-to-the-nationwide-injunction-problem/>), Adam White (<https://perma.cc/2W96-WCD7>) recommendations? See also the underlying report by Joseph Mead. Consistent with those articles, CFPB would support considering recommendations beyond what is contemplated here. Another possibility to consider would be "entire pool of judges in that state or territory."