

**BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

**IN RE EQUIFAX, INC. DATA BREACH
LITIGATION**

MDL No. Pending No. 49

**MOTION FOR EXPEDITED CONSIDERATION OF MOTION TO
TRANSFER ACTIONS PURSUANT TO 28 U.S.C. § 1407**

Adam J. Levitt
Amy E. Keller
Daniel R. Ferri
DiCELLO LEVITT & CASEY LLC
Ten North Dearborn Street
Eleventh Floor
Chicago, Illinois 60602
T 312-214-7900
alevitt@dlcfirm.com
akeller@dlcfirm.com
dferri@dlcfirm.com

Kenneth S. Canfield
Georgia Bar No. 107744
**DOFFERMYRE SHIELDS CANFIELD
& KNOWLES, LLC**
1355 Peachtree St., NE
Suite 1600
Atlanta, Georgia 30309
T 404-881-8900
kcanfield@dsckd.com

Pat A. Cipollone
Robert B. Gilmore
**STEIN MITCHELL CIPOLLONE
BEATO & MISSNER LLP**
1100 Connecticut Ave., N.W.
Washington, DC 20036
T 202-737-7777
pcipollone@steinmitchell.com
rgilmore@steinmitchell.com

Andrew N. Friedman
Douglas J. McNamara
Sally Handmaker
**COHEN MILSTEIN, SELLERS
& TOLL PLLC**
1100 New York Avenue, NW, Suite 500
Washington, DC 20005
T 202-408-4600
afriedman@cohenmilstein.com
dmcnamara@cohenmilstein.com
shandmaker@cohenmilstein.com

James Pizzirusso
HAUSFELD
1700 K St. NW
Suite 650
Washington, D.C. 20006
T 202-540-7200
jpizzirusso@hausfeld.com

*Counsel for Plaintiffs in the
Washburn Action*

Pursuant to Rule 6.3 of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, John Washburn, Aver Ash, Cassandra Powers, James Findlay, AmySue Taylor, and Evelyn Gualandi, Plaintiffs in the action styled *Washburn, et al. v. Equifax, Inc.*, No. 17-mi-99999-UNA (N.D. Ga.) (the “*Washburn Action*”),¹ respectfully submit this brief in support of expedited consideration regarding the pending motion for transfer of actions to the Northern District of Georgia for coordinated or consolidated pretrial proceedings.

Given that Equifax’s breach is so widespread, Movants assert that delay of a ruling from the Panel until the next Panel Session (November 30) almost certainly would result in piecemeal litigation of dozens of similar cases across the country, with the attendant inefficiencies, uncertainty, and potential for conflicting actions for the next several months. Considering the important and immediate security risks at issue, Movants request that the Panel consider this motion at its next hearing session on September 28, 2017 (rather than two-and-a-half months from now), and set an expedited briefing schedule for this motion requiring responses to be filed on September 18, and replies on September 22. The reasons for this motion are set forth in Plaintiffs’ combined brief.

Dated: September 11, 2017

Respectfully submitted by:

/s/ Adam J. Levitt

Adam J. Levitt

Amy E. Keller

Daniel R. Ferri

DiCELLO LEVITT & CASEY LLC

Ten North Dearborn Street

Eleventh Floor

Chicago, Illinois 60602

¹ Plaintiffs in this action are awaiting a permanent case number, as the United States District Court for the Northern District of Georgia is currently closed due to Hurricane Irma.

T 312-214-7900
alevitt@dlcfirm.com
akeller@dlcfirm.com
dferri@dlcfirm.com

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**DOFFERMYRE SHIELDS CANFIELD
& KNOWLES, LLC**
1355 Peachtree St., NE
Suite 1600
Atlanta, Georgia 30309
T 404-881-8900
kcanfield@dsckd.com

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HAUSFELD
1700 K St. NW
Suite 650
Washington, D.C. 20006
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& TOLL PLLC**
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Washington, DC 20005
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dmcnamara@cohenmilstein.com
shandmaker@cohenmilstein.com

Counsel for Plaintiffs in the Washburn Action