

Bodman PLC

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### Federal Court Reinstates Corporate Transparency Act's Year-End Filing Deadline

By: Kelsey M. Doran, Senior Associate, and Grace A. Connolly, Associate,  
Business Practice Group

The federal Court of Appeals for the Fifth Circuit entered an order on December 23, 2024 reinstating the Corporate Transparency Act's ("CTA") year-end filing deadline. Earlier this month, a federal judge in Texas ordered a preliminary injunction suspending the CTA's January 1, 2025 filing deadline while litigation regarding the law's constitutionality was in process. The Fifth Circuit's order, which came just days before the filing deadline, lifts the injunction and allows the CTA to be enforced while the larger constitutional case is pending. The Fifth Circuit has also ordered that the courts' review of the constitutional issues in the case be expedited.

In response to the court order, FinCEN has extended the CTA's reporting deadlines as follows:

- Entities formed or registered to do business in the U.S. before January 1, 2024 have until January 13, 2025 to file their initial reports;
- Entities formed or registered to do business in the U.S. on or after September 4, 2024 that had a filing deadline between December 3, 2024 and December 23, 2024 have until January 13, 2025 to file their initial reports; and
- Businesses formed or registered to do business in the U.S. on or after December 3, 2024 and on or before December 23, 2024 have an additional 21 days from their original filing deadline to file their initial reports.

Bodman is closely monitoring further developments in this case and will provide more information as it becomes available. For questions regarding the impact of this decision on your company's CTA reporting obligations, please contact your Bodman attorney or one of the authors, Kelsey Doran (734-930-5688 | [kdoran@bodmanlaw.com](mailto:kdoran@bodmanlaw.com)) or Grace Connolly (313-393-7563 | [gconnolly@bodmanlaw.com](mailto:gconnolly@bodmanlaw.com)). Bodman cannot respond to your questions or receive information from you concerning your company's CTA filing obligations without first clearing potential conflicts with other clients. Thank you for your patience and understanding.