

Bodman PLC

January 3, 2025

### Federal Court Reinstates Injunction Against Enforcement of Corporate Transparency Act

#### *Filing Requirements Under the CTA On Hold Until Further Notice*

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

On December 26, 2024, the Fifth Circuit Court of Appeals vacated its earlier stay of the injunction suspending the reporting deadlines for the Corporate Transparency Act (the “CTA”). The court had previously ruled on December 23 that the injunction would be stayed pending resolution of the constitutional questions in the case. The latest decision reverses that ruling and reinstates the nationwide injunction against enforcement of the CTA. **As a result, the CTA is once again on hold and companies are not required to file their beneficial ownership reports until further notice from the court.** The Fifth Circuit has issued an expedited briefing schedule on the constitutional issues in the case, with oral arguments to be held in March 2025.

Following the court’s latest order, the U.S. Solicitor General filed an appeal to the United States Supreme Court on December 31, requesting that the preliminary injunction be stayed while the Fifth Circuit reviews the case. Alternatively, the appeal argues, the Supreme Court should grant a partial stay of the nationwide injunction, which the government argues is overbroad, and narrow it to apply only to the plaintiffs in this particular case.

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.