

Feels Like Groundhog Day as Preliminary Injunction of Enforcement of the Corporate Transparency Act is Back

Just days ago, [we reported](#) that on December 23, 2024 the United States Court of Appeals for the Fifth Circuit (the “Fifth Circuit”) ordered that the nationwide preliminary injunction against the enforcement of the Corporate Transparency Act is stayed, and that the compliance deadline was once again in effect, subject to some nominal extensions of the upcoming deadlines. We also reported that the Fifth Circuit ordered the “appeal is EXPEDITED to the next available oral argument panel” and the situation remains fluid and continues to evolve. On December 26, 2024, the Fifth Circuit Court of Appeals vacated its own stay of the preliminary injunction of the enforcement of the January 1, 2025 deadline for reporting compliance. Currently, pleadings are on an expedited schedule and the appeal is calendared for oral argument on March 25, 2025, and the situation continues to remain fluid.

The key takeaway is that at this time the injunction is in effect and reporting companies are not currently required to file their beneficial ownership reports.



Brian A. Haskel, Esq.

Member of the Firm
Sills Cummis & Gross P.C.
bhaskel@sillscummis.com
(212) 500-1541



Robert E. Schiappacasse, Esq.

Co-Chair, Corporate Department
Sills Cummis & Gross P.C.
rschiappacasse@sillscummis.com
(973) 643-6099