

# ESBROOK P.C.

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**April 25, 2025**

***Via ECF***

Chief Judge Virginia M. Kendall  
United States District Court for the Northern District of Illinois  
Everett McKinley Dirksen United States Courthouse, Courtroom 2541  
219 South Dearborn Street  
Chicago, IL 60604

**Re: Illinois Bankers Association v. Raoul, Case No. 1:24-cv-07307**

Dear Chief Judge Kendall:

I write on behalf of *Amici Curiae* Restaurant Law Center, Illinois Restaurant Association, & the Retail Litigation Center, Inc. (“*Amici*”), which represent tens of thousands of restaurants and other retailers employing hundreds of thousands of individuals throughout the United States. *Amici* filed an *amicus curiae* brief in support of Defendant’s opposition to Plaintiffs’ motion for a preliminary injunction. (See ECF No. 91.)

*Amici* and their members have a significant interest in the important issues raised by this case and support the Illinois Interchange Fee Prohibition Act’s (IFPA) laudable attempt to solve a major problem by providing much needed relief from the exorbitant and ever-mounting interchange fees charged by card networks in this State. There are currently *no* federal laws or regulations that govern the cost of credit card transactions within the U.S. payments ecosystem. This regulatory vacuum has enabled card networks to charge U.S. merchants the highest interchange fees in the industrialized world. Issuers’ grievances with IFPA’s relatively modest reduction in interchange fees that would result from excluding the portion of a transaction attributable to taxes and gratuities for sales in Illinois are thus significantly overstated, and reform to the payment ecosystem is sorely needed.

*Amici* respectfully request that its previous submission (ECF No. 91) be considered by this Honorable Court in conjunction with the Attorney General’s opposition to Plaintiffs’ motion for summary judgment and cross-motion for summary judgment (ECF Nos. 123 and 136), as the arguments set forth in our previous submission are equally applicable to this Court’s review of the merits at the summary judgment stage. For the reasons set forth in their previous submission, *Amici* urge the Court to deny Plaintiffs’ motion for summary judgment and grant the Attorney General’s cross-motion for summary judgment.

Respectfully submitted,

/s/ Michael Kozlowski  
Michael Kozlowski

*Counsel for Amici Curae Restaurant Law  
Center, Illinois Restaurant Association, &  
the Retail Litigation Center, Inc*