

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

VALUTA CORPORATION, INC., and  
PAYAN'S FUEL CENTER, INC.,

*Plaintiffs,*

v.

FINANCIAL CRIMES ENFORCEMENT  
NETWORK, *et al.*,

*Defendants.*

Civil Case No. 3:25-cv-00191-LS

---

**PLAINTIFFS' NOTICE OF CROSS-APPEAL**

---

On September 19, 2025, all Defendants in the above styled action filed a Notice of Appeal (Doc. 63) to the United States Court of Appeals for the Fifth Circuit from the order granting Plaintiffs' Motion for Preliminary Injunction on July 22, 2025. Defendants' appeal has been docketed at the Fifth Circuit as Case No. 25-50776.

PLEASE TAKE NOTICE that all Plaintiffs hereby cross-appeal to the United States Court of Appeals for the Fifth Circuit from the order granting Plaintiffs' Motion for Preliminary Injunction on July 22, 2025. Without limitation to any other issues, Plaintiffs' cross-appeal encompasses the scope of the preliminary injunction entered by the Court.

Dated: October 1, 2025

Respectfully submitted,

/s/ Andrew Ward

Andrew Ward (NY Bar No. 5364393)\*

Elizabeth L. Sanz (CA Bar No. 340538)\*

INSTITUTE FOR JUSTICE

901 N. Glebe Road, Suite 900

Arlington, VA 22203

(703) 682-9320

ahward@ij.org

bsanz@ij.org

Robert E. Johnson (DC Bar No. 1013390)\*  
INSTITUTE FOR JUSTICE  
16781 Chagrin Blvd., Suite 256  
Shaker Heights, OH 44120  
(703) 682-9320  
rjohnson@ij.org

Christen Mason Hebert (TX Bar No. 24099898)  
Jeffrey Rowes (TX Bar No. 24104956)\*  
INSTITUTE FOR JUSTICE  
816 Congress Ave., Suite 970  
Austin, TX 78701  
(512) 480-5936  
chebert@ij.org  
jrowes@ij.org

Katrin Marquez (FL Bar No. 1024765)\*  
INSTITUTE FOR JUSTICE  
2 South Biscayne Blvd., Suite 3180  
Miami, FL 33131  
(305) 721-1600  
kmarquez@ij.org

\* Admitted *Pro Hac Vice*

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that on October 1, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Andrew Ward  
Andrew Ward