

# Real Property, Financial Services, & Title Insurance Update: Week Ending April 16, 2021

April 16, 2021

## Real Property Update

No cases of interest to report.

## Financial Services Update

- **TCPA / ATDS:** To qualify as an ATDS, a device must have the capacity to store a telephone number using a random or sequential number generator, or to produce a telephone number using a random or sequential number generator – [Facebook, Inc. v. Duguid](#), No. 19-511 (U.S. Apr. 1, 2021)
- **FCRA / Description of Judgment:** Credit reporting agency’s description of default judgment, which had been entered against a consumer as “satisfied,” was accurate – [Shimon v. Equifax Info. Servs. LLC](#), No. 20-689 (2d Cir. Apr. 9, 2021)

## Title Insurance Update

No cases of interest to report.

## Related Practices

[Real Property Litigation](#)

[Consumer Finance](#)

[Title Insurance](#)

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