

# Real Property, Financial Services, & Title Insurance Update: Week Ending July 17, 2020

July 17, 2020

## Real Property Update

- No cases of interest to report as of now.

## Financial Services Update

- **TCPA / Standing / Text Messages:** Plaintiff failed to establish standing to bring TCPA claim because plaintiff had not shown he suffered an injury in fact where he received two text messages, spent 60 seconds reviewing them, seven minutes researching the source of the messages, and five minutes locating and retaining counsel – [Perez v. Golden Tr. Ins., Inc.](#), No. 1:19-cv-24157 (S.D. Fla. July 6, 2020) (dismissing complaint without prejudice)
- **FDCPA / Debt Collectors:** Plaintiff did not plead sufficient facts to establish that defendants are debt collectors within the meaning of the FDCPA – [Herrera v. Navient Corps.](#), No. 1:19-cv-06583 (E.D.N.Y. July 13, 2020) (granting dismissal motion)

## Title Insurance Update

- No cases of interest to report.

## Related Practices

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