



Jamie Cotter and Kersten Holzhueter Analyze FDCPA Standing Burdens in ACA International

Spencer Fane attorneys [Jamie Cotter](#) and [Kersten Holzhueter](#) recently wrote an article for *ACA International* covering how *Spokeo Inc. v. Robins* is being applied to Fair Debt Collection Practices Act (FDCPA) claims.

Titled “Confusion and Anxiety Fail to Satisfy a Plaintiff’s Burden Under the FDCPA,” the article explains how “confusion and annoyance” no longer satisfy a litigant’s burden to establish Article III standing in FDCPA claims. Jamie and Kersten analyze how cases across the country have applied *Spokeo* in the context of FDCPA claims.

“At the end of 2020, multiple 7th Circuit decisions held that plaintiffs lacked standing to assert FDCPA claims under the guidance set forth in *Spokeo*,” Jamie and Kersten noted. “The court explained that it must be reasonable to infer that a plaintiff ‘would have pursued a different course of action were it not for the statutory violation.’”

To read the full article, click [here](#).