David Schultz Reviews a Humorous—But Important—FDCPA Procedural Ruling

Featured Column in the August 10, 2026, Issue of the *ARM Compliance Digest*

In The News | 1 min read
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In the August 10, 2026, issue of the AccountsRecovery.net *ARM Compliance Digest,* Hinshaw partner David Schultz recommends the entertainment value of reading a 28-page decision by District Judge Seeger denying a motion for default judgment in a case brought under the Fair Debt Collection Practices Act.

David writes:

> We're generally too busy to read cases for fun. However, if you have a chance, you'll get a kick out of N.D. IL Judge Seeger's ruling in *Love v Travelers Management Group, et al*. He essentially writes a 28 page law review article on a relatively straightforward legal issue but does so with humor. In the process, he explains it "isn't common for the leading case on a procedural question to come from the Reconstruction era" – *Frow v. De La Vega*, 82 U.S. 552, 554 (1872).
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> If you want the holding, you could probably just skip to the last page. Even the judge says he rambled on: "All of this is a long way of making a simple point." That simple point is that the court "needs to sit tight on entering a default judgment against the agent until this Court has resolved the claims against the principal on the merits."
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> He explains that when the liability of co-defendants is mutually dependent, multiple judgments create a potential for inconsistencies. He elaborates on this point: "Joint liability is like being on a ship with a bunch of friends, and hitting an iceberg in the North Atlantic. It's sink-or-float time, for everyone. You're going to stay afloat as a group, or you're all going down together. Everyone is in the same boat, literally and figuratively."
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> It's not a particularly complex legal issue but Judge Seeger surely makes it a fun story.

Read the full August 10, 2026, edition

- AccountsRecovery.net *ARM Compliance Digest:* "Judge Invokes 154-Year-Old Precedent to Deny Default Judgment in FDCPA Case" (August 10, 2026)

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