UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

Watkins v. Equifax Information Services LLC

Watkins · No. 1:25-cv-524 · Decided December 30, 2025

SUMMARY

The Southern District of Ohio denied Equifax Information Services LLC's motion to dismiss a Fair Credit Reporting Act claim concerning allegedly truncated account numbers in a consumer file disclosure. The court held that the complaint plausibly alleged that Equifax had included complete account numbers in consumer reports provided to third parties, making the information potentially subject to disclosure under 15 U.S.C. § 1681g(a)(1). The court also denied the plaintiff's motions for leave to file a surreply and for a detailed written ruling.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Douglas R. Cole
JURISDICTION	United States District Court for the Southern District of Ohio
DECIDED	December 30, 2025
DOCKET	1:25-cv-524
DISPOSITION	other
PROCEDURAL POSTURE	Defendant moved to dismiss the plaintiff's Fair Credit Reporting Act complaint under Rule 12(b)(6). The plaintiff also moved for leave to file a surreply and for a detailed written ruling.
STANDARD OF REVIEW	On a Rule 12(b)(6) motion, the court accepts well-pleaded factual allegations as true, construes the complaint in the plaintiff's favor, draws reasonable inferences for the plaintiff, and determines whether the complaint states a plausible claim for relief.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

credit reporting · motions to dismiss · statutory interpretation · consumer protection · civil procedure

PRACTICE AREAS

consumer credit reporting | consumer protection | federal civil procedure

QUESTIONS PRESENTED

1. Whether Watkins showed good cause for leave to file a surreply under S.D. Ohio Civ. R. 7.2(a)(2).
2. Whether a plaintiff asserting a claim under 15 U.S.C. § 1681g(a)(1) must allege that the omitted information bears on creditworthiness.
3. Whether truncated account numbers allegedly included in Equifax's consumer-file disclosure stated a plausible Fair Credit Reporting Act claim.
4. Whether the court should grant Watkins's motion for a detailed written ruling.

HOLDINGS

1. Leave to file a surreply was properly denied because Watkins did not demonstrate good cause; her arguments addressed the merits of Equifax's position rather than new grounds or misstatements raised in the reply.
2. For purposes of § 1681g(a), a consumer's file includes information that the consumer reporting agency included in a consumer report in the past or plans to include in a consumer report in the future; the provision is not limited to information that bears on the consumer's creditworthiness.
3. Watkins plausibly alleged that Equifax violated § 1681g(a)(1) by providing truncated account numbers where Equifax allegedly included complete account numbers in consumer reports furnished to third parties.
4. Watkins's motion for a detailed written ruling was denied because the court treated it as an improper request for a surreply and resolved the motion to dismiss in the opinion.

KEY QUOTATIONS

> *"The Court holds that Watkins' Complaint adequately alleges a violation of the FCRA and therefore DENIES Equifax's Motion to Dismiss (Doc. 4)."*

> *"The Court agrees with this interpretation of the statute and adopts it here."*

> *"That's a factual question—what did Equifax actually do?—that the Court cannot resolve based on statutory definitions."*

FACTUAL BACKGROUND

Watkins alleged that Equifax, a consumer reporting agency, provided her with a consumer-file disclosure containing truncated account numbers and thereby failed to disclose all information in her file. She alleged that Equifax's automated, template-driven system routinely omitted complete account numbers and other data fields, preventing consumers from identifying accounts and investigating possible fraud, identity theft, or inaccuracies. Watkins alleged resulting confusion, frustration, anxiety, and an effort to obtain professional therapy.

PROCEDURAL HISTORY

Watkins filed the action in Hamilton County Municipal Court on June 23, 2025. Equifax timely removed it to the Southern District of Ohio on July 28, 2025, and then moved to dismiss. The court denied the motion to dismiss, denied Watkins's motion for leave to file a surreply, and denied her motion for a detailed written ruling.

DISPOSITION

other

CASES CITED

- Ashcroft v. Iqbal, 556 U.S. 662, 678 (2009)
- Keene Grp., Inc. v. City of Cincinnati, 998 F.3d 306, 310 (6th Cir. 2021)
- Neitzke v. Williams, 490 U.S. 319, 326 (1989)
- Canter v. Alkermes Blue Care Preferred Provider Plan, 593 F. Supp. 3d 737, 744-45 (S.D. Ohio 2022)
- Liberty Legal Found. v. Nat'l Democratic Party of the USA, Inc., 875 F. Supp. 2d 791, 797 (W.D. Tenn. 2012)
- Gillespie v. Trans Union Corp., 482 F.3d 907, 908-10 (7th Cir. 2007)
- Marx v. Gen. Revenue Corp., 568 U.S. 371, 385-86 (2013)
- Arlington Cent. Sch. Dist. Bd. of Educ. v. Murphy, 548 U.S. 291, 299 n.1 (2006)
- Selvam v. Experian Info. Sols., Inc., 651 F. App'x 29, 33 (2d Cir. 2016)
- Shaw v. Experian Info. Sols., Inc., 891 F.3d 749, 759 (9th Cir. 2018)
- Danehy v. Experian Info. Sols., Inc., No. 5:18-cv-17, 2018 WL 4623647, at *3 (E.D.N.C. Sept. 26, 2018)
- Kelly v. RealPage Inc., 47 F.4th 202, 220 (3d Cir. 2022)
- Whitaker v. Trans Union Corp., No. 03-2551, 2005 WL 8160827, at *20 (D. Kan. Feb. 3, 2005)
- Washington v. Equifax, No. 3:19-cv-154, 2019 WL 2443126, at *2 (M.D. Tenn. June 12, 2019)
- Walker v. Equifax Information Solutions, LLC, No. 1:21-cv-1045, 2024 WL 4815355, at *7 (N.D. Ga. Sept. 23, 2024)
- Wimberly v. Experian Info. Sols., Inc., No. 18-cv-6058, 2019 WL 6895751, at *7, *9 (S.D.N.Y. Dec. 18, 2019)
