



## Gregory N. Blase

### Partner

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## OVERVIEW

Greg Blase advises clients on the development of integrated solutions for risk mitigation in industries that have consumer-facing business operations. He counsels companies to identify regulatory and litigation risk and to advise in-house legal departments and management on best practices for responding to that risk. Greg's clients include leading companies in the financial services, energy, media and telecommunications, manufacturing, and consumer products industries. Greg provides regulatory-compliance advice and policy and procedure review. He oversees audits and internal investigations and responds to government investigations. Greg defends complex litigation including class actions. He takes a holistic approach to addressing legal risk, recognizing the importance of bringing stakeholders together to solve problems collectively.

## EDUCATION

- J.D., Boston University School of Law, 2003
- B.A., Kalamazoo College, 1997

## ADMISSIONS

- Bar of Massachusetts
- Bar of Michigan
- Bar of New York

## THOUGHT LEADERSHIP *POWERED BY HUB*

- 12 February 2024, "Grandma, I have [not] been kidnapped": The FCC Bans AI-Generated Robocalls
- 17 January 2024, CFPB Aiming to Oversee Digital Payments
- 23 September 2023, The Power of the Purse: Supreme Court Hears Argument on Constitutionality of CFPB Funding Structure

- 28 June 2023, US Supreme Court Holds That an Appeal From a Denial of a Motion to Compel Arbitration Stays the District Court Proceeding
- 28 September 2022 , The Third Time Is the Charm: The Eleventh Circuit Allows Creditor's Use of Commercial Mail Vendor
- 17 November 2021, New But Not Improved: On Panel Rehearing, 11th Circuit Issues Revised FDCPA Decision in Hunstein v. Preferred Collection and Management Services
- 30 June 2021, "No Concrete Harm, No Standing:" U.S. Supreme Court's Decision Solidifies Standing Requirements for Fair Credit Reporting Act Claims
- 12 May 2021, Not a Preferred Course: 11th Circuit Decides FDCPA Question in Hunstein v. Preferred Collection and Management Services
- April 2021, 2021 Consumer Financial Services Symposium - Virtual Edition: Panel 1 - Fintech Trends, Developments, and New Directions
- 1 April 2021, It's No Joke: In 1 April 2021 Decision, Supreme Court Significantly Limits Definition of "ATDS" Under the TCPA
- 12 January 2021, Potential Major Change for U.S. Prepaid Products: PayPal vs CFPB Court Vacates Two Significant Restrictions in CFPB's Prepaid Account Rule
- 17 December 2020, The Massachusetts Supreme Judicial Court Holds State-Mandated Default Notice Not Inaccurate or Deceptive
- 10 December 2020, Supreme Court Hears Argument on Definition Of ATDS Under TCPA
- 10 July 2020, Supreme Court Agrees to Review Growing Circuit Split on Definition of ATDS
- 7 July 2020, Supreme Court Declares TCPA Government-Debt Exception Unconstitutional but Severs Provision to Preserve Remainder of TCPA
- 1 July 2020, The FCC Clarifies the Definition of ATDS
- 25 February 2020, *Strength in Numbers*: The Seventh Circuit Joins the Third and Eleventh Circuits in Limiting the Definition of an Automatic Telephone Dialing System under the TCPA
- 24 February 2020, The Massachusetts Supreme Judicial Court Considers the Effect of a State-Mandated Default Notice on the Validity of Non-Judicial Foreclosures
- 5 September 2019, Eleventh Circuit Holds That a Single, Unsolicited Text Message Does Not Confer Article III Standing Under the TCPA
- 27 June 2019, DACA Recipients Are Ineligible for FHA Mortgage Insurance Officially, but Lending to DACA Recipients and Other Immigrant Communities Is Subject to Many Unresolved Compliance Challenges
- 8 April 2019, U.S. Supreme Court Rules that Entities Conducting Nonjudicial Foreclosures Are Not Debt Collectors under the FDCPA

- 22 March 2019, Attorneys General Express Widespread Support for TRACED Act Reintroduced in the Senate to Stop Illegal Robocall Scams
- 14 March 2019, What Is in a Name? The Third Circuit Holds That Debt Buyers Can Be Debt Collectors under the FDCPA
- 11 February 2019, Massachusetts State Senators Seek to Enact Biometric Data Protection Law
- 14 January 2019, Revamped Relief
- 27 November 2018, Bipartisan Bill Introduced In The Senate To Thwart Illegal Robocall Scams
- 16 August 2018, Follow the Leader: The Sixth Circuit Applies *Spokeo*, Ruling That Certain Statutory Violations May, Without More, Establish Article III Standing to Bring an FDCPA Claim
- 23 May 2018, FCC Seeks Comment on TCPA Following D.C. Circuit's Decision in *ACA International*
- 9 May 2018, Trade Groups Petition the FCC to Adopt a Narrow Interpretation of Autodialer Under the TCPA
- 9 April 2018, District Court Finds No Violation of First Amendment in TCPA Suit Brought By Coalition of Bi-Partisan Political Organizations
- 22 March 2018, Court Finds Website Owner did not Send Text Messages Initiated by its Users and thus did not Violate the TCPA
- 16 March 2018, The D.C. Circuit Calls Out the FCC – Striking Key Elements of Its 2015 TCPA Order, While Upholding Certain Provisions
- 16 March 2018, Ninth Circuit Doubles Down on Lack of Standing under *Spokeo* in FACTA Cases
- 12 March 2018, Dismissing FDCPA Lawsuit, Sixth Circuit Calls Out Congress for Creating Statutory Remedies Where No Harm Has Occurred
- 12 March 2018, Lurking Beneath the Surface: UDAP Claims in ICO Litigation
- 12 March 2018, Dismissing FDCPA Lawsuit, Sixth Circuit Calls Out Congress for Creating Statutory Remedies Where No Harm Has Occurred
- 28 February 2018, Ninth Circuit Ruling Rejects FACTA Suit under *Spokeo*, Avoiding Circuit Split
- 26 February 2018, Ninth Circuit Ruling Rejects FACTA Suit under *Spokeo*, Avoiding Circuit Split
- 1 February 2018, Legislative Efforts to Curb Caller ID Spoofing Continue at Federal and State Levels
- 12 January 2018, Standing to Sue under the Fair and Accurate Credit Transactions Act after *Spokeo*
- 30 August 2017, District Court Denies Class Certification in TCPA Case; Finds No Injury Possible Where Call Recipients Consented to Calls, Even if Consent Not in Writing
- 25 August 2017, *Spokeo Redux*: Ninth Circuit Holds That a Statutory Violation under FCRA May, without More, Establish a Concrete Injury for Purposes of Article III Standing

- 28 July 2017, District Court Set to Rule on Cross Motions for Summary Judgment in First Amendment Challenge to TCPA
- 27 July 2017, District Court Set to Rule on Cross Motions for Summary Judgment in First Amendment Challenge to TCPA
- 3 July 2017, Federal Government Continues Defense Against First Amendment Challenge to TCPA
- 16 June 2017, U.S. House Judiciary Committee Examines Lawsuit Abuse and the TCPA
- 15 June 2017, CFPB Director Informs Consumer Advisory Board That Bureau Will Not Shy Away from Issuing Debt Collection Proposed Rule
- 24 May 2017, Balancing Act: Supreme Court Rules That Filing a Proof of Claim for Stale Debt Does Not Violate the Fair Debt Collection Practices Act
- 12 May 2017, It Wasn't Me! – District Court Dismisses TCPA Action Alleging Vicarious Liability against Hotel Chains
- 4 April 2017, U.S. Supreme Court Sides with Merchants in Credit Card Surcharge Case, But the Fight Isn't Over Yet
- 27 March 2017, FCC Begins Rulemaking Process to Allow Blocking of “Spoofed” Number Calls
- 27 March 2017, FCC Begins Rulemaking Process to Allow Blocking of “Spoofed” Number Calls
- 27 March 2017, Federal Government Not Successful in Moving to Dismiss First Amendment Challenge to TCPA
- 24 March 2017, Federal Government Not Successful in Moving to Dismiss First Amendment Challenge to TCPA
- 7 February 2017, Rep. Virginia Foxx Seeks to Prohibit Political Robocalls to Numbers on Do-Not-Call Registry
- 30 January 2017, Third Circuit Moves Toward a Broader View of Standing in FCRA Data-Breach Class Action
- 30 January 2017, Federal Courts Follow Two Approaches Post-Spokeo When Analyzing Standing
- 24 January 2017, “Survey Says”: CFPB Report Provides Further Insight Into Forthcoming Debt Collection Regulations
- 23 January 2017, Ajit Pai to be Named New FCC Chairman
- 18 January 2017, TCPA Class-Action Plaintiff Must Arbitrate Claims
- 13 January 2017, Court Rejects TCPA Claims Based on Theory of Third-Party Liability
- 7 January 2017, New House Energy & Commerce Committee Leaders Good News for TCPA Reform
- 15 December 2016, FCC Chairman Tom Wheeler Announces He Will Not Serve Out Term under New Administration

- 23 November 2016, Trump's Campaign to go it Alone on First Amendment Challenge to the TCPA
- 23 November 2016, Trump's Campaign to go it Alone on the First Amendment Challenge to the TCPA
- 10 November 2016, Leave the "Tow Truck Guy" Alone: The Ninth Circuit Rules Foreclosure of a Deed of Trust Is Not Debt Collection
- 7 November 2016, As Campaign Draws to a Close, Trump's First Amendment Challenge to the TCPA Continues On
- 7 November 2016, As Campaign Draws to a Close, Trump's First Amendment Challenge to the TCPA Continues on
- 21 October 2016, D.C. Circuit Keeps the Conversation Going in ACA Challenge to FCC's 2015 Order
- 19 October 2016, Federal Court Dismisses Suits for Failure to Allege Harm Traceable to Any TCPA Violation
- 28 September 2016, House Energy And Commerce Committee Calls For Modernizing The TCPA
- 28 September 2016, House Energy and Commerce Committee Calls for Modernizing the TCPA
- 27 September 2016, Third Circuit Finds Jurisdiction Despite Anti-Aggregation Rule, Holds TCPA Class Settlement Is Not Covered by Insurance Agreement
- 13 September 2016, Wireless Communications Trade Group Opposes FCC Petition Seeking Declaration That Text Messages Are Subject to the FCC's Open Internet Order
- 24 August 2016, Consumers Union Supports Stay of FCC's July 2016 Broadnet Ruling Exempting Federal Contractors from Ban on Robocalls
- 10 August 2016, Change Order: The CFPB Previews Its Proposed FDCPA Regulations
- 10 August 2016, Not So Fast: Political Organizations Amend Complaint Challenging Constitutionality of TCPA in Response to Attorney General's Motion to Dismiss
- 8 August 2016, Light Reading for the Dog Days of Summer: CFPB Finalizes Amendments to Mortgage Servicing Regulations
- 28 July 2016, The Ninth Circuit Holds That Subsequent Debt Collectors Must Send FDCPA Validation-of-Debt Notices
- 19 July 2016, Attorney General Lynch Seeks Dismissal of Political Organizations' Challenge to the TCPA
- 6 June 2016, Payday Loans Under Attack: The CFPB's New Rule Could Dramatically Affect High-Cost, Short-Term Lending
- 19 May 2016, Supreme Court Decision on Article III Injury-in-Fact in Spokeo Potentially Impacts Class Certification
- 16 May 2016, Supreme Court Vacates and Remands Ninth Circuit Decision on Article III Injury-in-Fact in Spokeo

- 1 April 2016, A Careful Balancing Act: Second Circuit Requires Debt Collectors to Disclose When a Consumer's Current Balance May Increase Due to Interest and Fees
- 30 March 2016, The Supreme Court Charts a Narrow Course in the Use of Statistical Evidence at Class Certification
- 9 March 2016, Sixth Circuit Finds "Prior Express Consent" in Affirming Dismissal of TCPA Class Action against Healthcare Provider's Debt Collector
- 25 January 2016, Your Money Is No Good Here: U.S. Supreme Court Holds That an Unaccepted Rule 68 Offer of Complete Relief Does Not Moot an Individual's Claims, but Questions Remain
- 22 January 2016, Your Money Is No Good Here: U.S. Supreme Court Holds That an Unaccepted Rule 68 Offer of Complete Relief Does Not Moot an Individual's Claims, but Questions Remain
- 22 January 2016, Your Money Is No Good Here: U.S. Supreme Court Holds That an Unaccepted Rule 68 Offer of Complete Relief Does Not Moot an Individual's Claims, but Questions Remain
- 22 September 2015, You Had Me at "Hello" Letter: Second Circuit Concludes That a RESPA Transfer-of-Servicing Letter Can Be a Communication in Connection with Collection of Debt
- 19 July 2015, FCC Empowers TCPA Plaintiffs At Peril of Business
- 27 May 2015, Supreme Court Grants Cert. to Consider Whether Offer of Complete Relief Moots TCPA Class Action
- 29 April 2015, *Spokeo, Inc. v. Robins*: U.S. Supreme Court to Consider Whether Plaintiffs Have Standing to Assert a Statutory Violation without Alleging any Actual Harm

## OTHER PUBLICATIONS

- "Third Time Is the Charm: Eleventh Circuit Allows Creditor's Use of Commercial Mail Vendor," *The Banking Law Journal*, January 2023
- "Mortgage Lending to Nontraditional Borrowers: The Opportunities and Compliance Points of Mortgage Lending to DACA Recipients, Recent Immigrants, and Limited-English Proficiency Borrowers," *The Banking Law Journal*, April 2019
- "Massachusetts State Senators Seek to Enact Biometric Data Protection Law," *The National Law Review*, 11 February 2019
- In *Spokeo* Remand, Ninth Circuit Adopts Hybrid Approach to Statutory-Standing Analysis, *Washington Legal Foundation*, Andrew C. Glass, Gregory N. Blase, Roger L. Smerage, and Hollee M. Watson, 20 October 2017
- A Closer Look At *Midland Funding V. Johnson*, Law360, by Phoebe S. Winder, Andrew C. Glass, Gregory N. Blase, and Sean R. Higgins, June 15, 2017
- The Credit Card Surcharge Fight Isn't Over Yet, Law360, by Andrew C. Glass, Gregory N. Blase, Soyong Cho and Jeremy M. McLaughlin, April 14, 2017



- Federal Courts Follow Two Approaches Post-Spokeo When Analyzing Standing, *Washington Legal Foundation*, Legal Backgrounder, Vol. 32 No. 3, by Andrew C. Glass, Gregory N. Base, Ryan M. Tosi, Lindsay S. Bishop, and Roger L. Smerage, January 27, 2017
- The Truth About the New Fair Labor Standards Act Regulations: A View From the Trenches, *Labor and Employment Lawnotes*, (State Bar of Michigan), Winter 2005

## NEWS & EVENTS

- 24 March 2023, K&L Gates Team Obtains Appellate Victory for Mortgage Lender in NY Tax Foreclosure Case

## AREAS OF FOCUS

- Payments, Banking Regulation, and Consumer Financial Services
- Appellate Litigation
- Class Action Litigation Defense
- Commercial Disputes
- Financial Institutions and Services Litigation
- Fintech Lending

## INDUSTRIES

- Financial Services
- Fintech