



Consvoy McCarthy PLLC

1600 Wilson Boulevard, Suite 700
Arlington, VA 22209
703.243.9423
www.consvoymccarthy.com

June 6, 2025

Via electronic filing and mail

Hon. Scott S. Harris, Clerk
Supreme Court of the United States
One First Street, NE
Washington, D.C. 20543

Re: GHP Management Corp., et al. v. City of Los Angeles, et al., No. 24-435

Dear Mr. Harris:

Petitioners have a pending petition in *GHP Management Corporation, et al. v. City of Los Angeles, et al.*, No. 24-435. The petition raises questions about whether and when eviction moratorium laws can give rise to physical takings claims. The circuits are split. Had Petitioners' case been heard in the Federal Circuit, consistent with *Darby Development Co. v. United States*, 112 F.4th 1017 (Fed. Cir. 2024), Petitioners' case would not have been dismissed before it could even begin. Today, the Federal Circuit denied the federal government's rehearing petition in *Darby*. That denial of rehearing *en banc* confirms that this split of authority will persist.

The petition remains worthy of this Court's review to bring uniformity to the appellate courts on this important issue of constitutional law and fundamental property rights.

Sincerely,

Taylor A.R. Meehan

Counsel of Record

CONSOVOY MCCARTHY PLLC

1600 Wilson Blvd., Suite 700

Arlington, VA 22209

(703) 243-9423

taylor@consvoymccarthy.com