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March 21, 2025

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

Re: *Centerville Clinics Inc., Petitioner v. Jane Doe*, No. 24-727

Dear Mr. Harris:

Centerville Clinics Inc.’s above-referenced petition for a writ of certiorari—which was distributed on February 26, 2025 for consideration at the Court’s conference today (March 21, 2025)—seeks review of a Third Circuit decision that the Ninth Circuit expressly rejected in *Blumberger v. Tilley*, 115 F.4th 1113, 1128 (9th Cir. 2024) (“*Doe v. Centerville Clinics Inc.* . . . illustrates the dangers of eliding th[e] distinction” between the decisions of two executive branch department heads), *petitions for reh’g en banc denied*, No. 22-56032, Dkt. 83 (9th Cir. Dec. 19, 2024). Although the United States chose not to file a response to Centerville’s petition, the Solicitor General sought and, on March 13, obtained an extension to file a petition for a writ of certiorari in *Blumberger*. No. 24A865 (granting extension through April 18, 2025) (Kagan, J.)

In light of the circuit split and overlapping legal issues in the two cases, Centerville respectfully submits that the Court should consider holding Centerville’s petition in abeyance pending the Solicitor General’s anticipated petition in *Blumberger*. Cf. Stephen M. Shapiro *et al.*, Supreme Court Practice § 5.9, at 339 (9th ed. 2007) (noting other circumstances in which the Court will defer action on a pending petition for a writ of certiorari).

Sincerely,



Matthew S. Freedus