No. _____

In the

Supreme Court of the United States

_____

Dionte Dorun Matlock,

Petitioner,

v.

United States of America,

Respondent.

_____

On Petition for a Writ of Certiorari
to the United States Court of Appeals
for the Fifth Circuit

_____

PETITION FOR A WRIT OF CERTIORARI

_____

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QUESTION PRESENTED

Whether 18 U.S.C. § 922(g)(1) facially violates the Second Amendment?

PARTIES TO THE PROCEEDING

Petitioner is Dionte Dorun Matlock, who was the Defendant-Appellant in the court below. Respondent, the United States of America, was the Plaintiff-Appellee in the court below.

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Dionte Dorun Matlock seeks a writ of certiorari to review the judgment of the United States Court of Appeals for the Fifth Circuit.

OPINIONS BELOW

The Fifth Circuit's unpublished opinion is available at *United States v. Matlock*, No. 24-10579, 2025 WL 801356 (5th Cir. Mar. 13, 2025). It is reprinted in Appendix A. The district court's judgement and sentence in *United States v. Matlock*, No. 3:23-cr-359-K-1 (N.D. Tex. Jun. 26, 2024), is reprinted in Appendix B.

JURISDICTION

The Fifth Circuit entered judgment on March 13, 2025. This Court has jurisdiction pursuant to 28 U.S.C. § 1254(1).

RELEVANT CONSTITUTIONAL AND STATUTORY PROVISIONS

The Second Amendment to the U.S. Constitution provides:

> A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.

U.S. Const. amend. II.

Section 922(g)(1) of Title 18 reads in relevant part:

> (g) It shall be unlawful for any person—
>
> (1) who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year . . .
>
> to ship or transport in interstate or foreign commerce, or possess in or affecting commerce, any firearm or ammunition; or to receive any firearm or ammunition which has been shipped or transported in interstate or foreign commerce.

18 U.S.C. § 922(g)(1).

STATEMENT OF THE CASE

I. Facts and Proceedings in District Court

The government obtained an indictment against Petitioner Dionte Dorun Matlock, alleging that he possessed a firearm following a felony conviction. Record in the Court of Appeals 7-9. Mr. Matlock moved to dismiss the indictment, arguing, *inter alia*, that 18 U.S.C. § 922(g)(1)'s possession prong is unconstitutional under the Second Amendment. Record in the Court of Appeals 30-51. The district court denied the motion as foreclosed by precedent. Record in the Court of Appeals 73.

Subsequently, Mr. Matlock pleaded guilty to the indictment without a plea agreement. Record in the Court of Appeals 98-117.

At sentencing, the district court imposed a sentence of 18 months, to be followed by two years of supervised release. Record in the Court of Appeals 83-84; [Appendix B].

II. Appellate Proceedings

Mr. Matlock reiterated his Second Amendment argument on appeal. He argued that his conviction was unconstitutional in light of *New York State Rifle & Pistol Ass'n, Inc. v. Bruen*, 597 U.S. 1 (2022).

The Fifth Circuit affirmed in an unpublished opinion. *United States v. Matlock*, No. 24-10579, 2025 WL 801356 (5th Cir. Mar. 13, 2025) [Appendix A]. It held that Mr. Matlock's facial challenge is foreclosed by *United States v. Diaz*, 116 F.4th 458 (5th Cir. 2024). *See Matlock*, No. 24-10579, 2025 WL 801356 at *1 (5th Cir. Mar. 13, 2025) (citing *Diaz*, 116 F.4th 458).

REASON FOR GRANTING THE PETITION

Section 922(g)(1) is facially unconstitutional because its lifetime prohibition on gun possession imposes a historically unprecedented burden on the right to bear arms. No historical firearm law imposed *permanent* disarmament. And the justification behind § 922(g)(1)—disarming a broad group of potentially irresponsible individuals—also fails historical scrutiny. The decision below relied on the Fifth Circuit's opinion in *Diaz*, which suffers from analytical flaws and is at odds with this Court's guidance in *Bruen* and *United States* v. *Rahimi*, 602 U.S. 680 (2024).

This question is critically important. Section 922(g)(1) is one of the most commonly charged federal offenses. Uncertainty about whether the statute is constitutional affects thousands of criminal cases each year. Even more concerning, § 922(g)(1) categorically and permanently prohibits millions of Americans from exercising their right to keep and bear arms.

This Court's intervention is urgently needed to resolve the scope of a fundamental constitutional right. After *Rahimi*, the confusion among the courts of appeals has only deepened. The Court should grant certiorari.

I. This Court should decide the constitutionality of 18 U.S.C. § 922(g)(1) under the Second Amendment.

A. *Bruen* abrogated precedent upholding the constitutionality of § 922(g)(1).

The Second Amendment to the United States Constitution mandates that a "well-regulated militia, being necessary to the security of a free state, the right of the people to keep and bear arms, shall not be infringed." U.S. CONST. amend. II. In

District of Columbia v. Heller, this Court held that the Second Amendment codified an individual right to possess and carry weapons, the core purpose of which is self-defense in the home. 554 U.S. 570, 628 (2008). *See also McDonald* v. *City of Chicago*, 561 U.S. 742, 767 (2010) (holding "that individual self-defense is the central component of the Second Amendment right").

After *Heller*, the Fifth Circuit "adopted a two-step inquiry for analyzing laws that might impact the Second Amendment." *Hollis* v. *Lynch*, 827 F.3d 436, 446 (5th Cir. 2016). In the first step, courts asked "whether the conduct at issue falls within the scope of the Second Amendment right." *United States* v. *McGinnis*, 956 F.3d 747, 754 (5th Cir. 2020) (quoting *Nat'l Rifle Ass'n of Am., Inc.* v. *Bureau of Alcohol, Tobacco, Firearms & Explosives*, 700 F.3d 185, 194 (5th Cir. 2012)). This step involved determining "whether the law harmonizes with the historical traditions associated with the Second Amendment guarantee." *Id.* at 754. If the conduct was outside the scope of the Second Amendment, the law was constitutional. *Id.* Otherwise, courts proceeded to the second step to determine whether to apply strict or intermediate scrutiny. *Id.*

In *Bruen*, this Court announced a new framework for analyzing Second Amendment claims, abrogating the two-step inquiry adopted by the Fifth Circuit and others. *See* 597 U.S. at 19. *See also Diaz*, 116 F. 4th at 465 (holding that *Bruen* "render[s] our prior precedent obsolete") (quotation omitted). It rejected step two of that framework because "*Heller* and *McDonald* do not support applying means-end scrutiny in the Second Amendment context." *Bruen*, 597 U.S. at 19.

The Court elaborated that, under the new framework, "when the Second Amendment's plain text covers an individual's conduct, the Constitution presumptively protects that conduct." *Id.* at 17. The government then "must demonstrate that the regulation is consistent with this Nation's historical tradition of firearm regulation." *Id.* Only then may a court conclude that the individual's conduct falls outside of the Second Amendment's "unqualified command." *Id.* (citation omitted). *See also United States* v. *Rahimi*, 602 U.S. 680, 699–700 (2024) (finding § 922(g)(8) facially constitutional under *Bruen*'s Second Amendment test).

B. *Diaz* was wrongly decided, insofar as it holds that the government has met its burden under *Bruen* step 2.

In *Diaz*, the Fifth Circuit considered a facial and as-applied challenge to § 922(g)(1). It first recognized that the constitutionality of § 922(g)(1) was an open question. This Court had not yet directly addressed the constitutionality of § 922(g)(1), and while the Fifth Circuit had issued prior decisions upholding the constitutionality of § 922(g)(1), these decisions relied on "the means-ends scrutiny that *Bruen* renounced" and did not survive *Bruen*. *Diaz*, 116 F. 4th at 465 (citing *United States* v. *Darrington*, 351 F.3d 632, 634 (5th Cir. 2003), and *United States* v. *Emerson*, 270 F.3d 203 (5th Cir. 2001)). The court also rejected the government's arguments that felons were not among "the people" protected by the Second Amendment. *See id.* at 466–67 ("Diaz's status as a felon is relevant to our analysis, but it becomes so in *Bruen*'s second step of whether regulating firearm use in this way is consistent with the Nation's historical tradition rather than in considering the Second Amendment's initial applicability.").

But the court ultimately affirmed Diaz's conviction. *Id.* at 472. It found § 922(g)(1) was constitutional on its face and as-applied because there was a historical tradition of imposing severe, permanent punishments on felons like Diaz who had been convicted of theft offenses. *See id.* at 466–472. Specifically, it explained that "[a]t the time of the Second Amendment's ratification, those—like Diaz—guilty of certain crimes—like theft—were punished permanently and severely," that is, by death or estate forfeiture, and "permanent disarmament was [also] a part of our country's arsenal of available punishments at that time." *Id.*

Under *Bruen*, courts must strike down the law unless the government can meet its "heavy burden" to identify a historic tradition of regulations that are "relevantly similar" to § 922(g)(1). *United States* v. *Connelly*, 117 F.4th 269, 274 (5th Cir. 2024). "The challenged and historical laws . . . must both (1) address a comparable problem (the 'why') and (2) place a comparable burden on the right holder (the 'how')." *Id.* (citing *Rahimi*, 602 U.S. 692, and *Bruen*, 597 U.S. at 27–30).

There is no way that the government could have met this heavy burden. Founding-era laws generally limited categorical disarmament to disempowered minority communities—for example, enslaved persons and Native Americans—and those perceived to be disloyal to the government. *See* Joseph G.S. Greenlee, *The Historical Justification for Prohibiting Dangerous Persons from Possessing Arms*, 20 WYO. L. REV. 249, 261–65 (2020); Robert H. Churchill, *Gun Regulation, the Police Power, and the Right to Keep Arms in Early America*, 25 LAW & HIST. REV. 139, 156–61 (2007). These laws are not relevantly similar to § 922(g)(1) because they did not

"impose a comparable burden on the right" and are not "comparably justified" to § 922(g)(1). *Bruen*, 597 U.S. at 29. In fact, "[p]ossessing a firearm as a felon . . . was not considered a crime until 1938 at the earliest." *Diaz*, 116 F.4th at 468 (citing Federal Firearms Act, ch. 850, §§ 1(6), 2(f), 52 Stat. 1250, 1250–51 (1938); An Act to Strengthen the Federal Firearms Act, Pub. L. No. 87–342, § 2, 75 Stat. 757, 757 (1961)).

Such twentieth century laws are well beyond the historical sources cited in *Bruen*, and they cannot demonstrate a longstanding tradition of disarming felons. *See Bruen*, 597 U.S. at 66 (noting that even "late-19th-century evidence cannot provide much insight into the meaning of the Second Amendment when it contradicts earlier evidence"). *See also Kanter* v. *Barr*, 919 F.3d 437, 454 (7th Cir. 2019) (Barrett, J., dissenting) (noting scholars have been unable to identify any founding-era laws disarming all felons); Adam Winkler, *Heller's Catch-22*, 56 UCLA L. REV. 1551, 1563 & n.67 (2009) ("The Founding generation had no laws limiting gun possession by the mentally ill, nor laws denying the right to people convicted of crimes."). Thus, the government cannot show that § 922(g)(1) is consistent with the Nation's historical tradition of firearm regulation.

This Court's decision in *Rahimi* also weighs in favor of striking down § 922(g)(1). *Rahimi* addressed a facial challenge to § 922(g)(8)(C)(i), the federal law that prohibits firearm possession by persons subject to certain domestic violence restraining orders. *Rahimi*, 602 U.S. 693. The Court found the government had met its burden to identify historical analogues that were "relevantly similar" to the

challenged statute. *Id.* at 697–98. Specifically, it held that the historical statutes identified by the government—surety laws and laws that prohibited riding or going armed with dangerous weapons—showed a national tradition of "temporarily disarm[ing]" an "individual found by a court to pose a credible threat to the physical safety of another." *Id.*

But, all the features that prevented this Court from striking down the *Rahimi* statute are missing from § 922(g)(1). In *Rahimi*, the Court emphasized the narrow scope of the challenged statute. It explained that "Section 922(g)(8) applies only once a court has found that the defendant represents a credible threat to the physical safety of another[,]" which "matches" the similar "judicial determinations" required in the surety and going armed laws. *Id.* at 699 (internal quotation marks omitted). The Court also emphasized the limited duration of § 922(g)(8). It explained that "Section 922(g)(8) only prohibits firearm possession so long as the defendant 'is' subject to a restraining order[,]" just "like surety bonds of limited duration[.]" *Id.* In contrast, § 922(g)(1) is a categorical ban that prohibits everyone convicted of a crime punishable by more than a year in prison from possessing a gun—without any individualized finding or consideration of whether or not they threaten others. *See* 18 U.S.C. § 922(g)(1). The analogues that the government relied upon in *Rahimi* cannot justify this broader, permanent ban. And this Court's reliance on features of § 922(g)(8) that are missing from § 922(g)(1) confirms that § 922(g)(1) cannot pass constitutional muster under *Bruen* and *Rahimi*. Thus, for the same reasons § 922(g)(8) is constitutional, § 922(g)(1) is not.

Diaz held that "laws authorizing severe punishments for" certain felonies "and permanent disarmament in other cases establish that our tradition of firearm regulation supports the application of § 922(g)(1) to" certain felons. 116 F.4th at 471. Respectfully, however, this analysis suffers from critical flaws.

First, as noted above, *Diaz* held that the government had met its burden to show a "relevantly similar" historical analogue to § 922(g)(1) by relying on historical laws that punished certain crimes by capital punishment and estate forfeiture. *See Diaz*, 116 F. 4th at 467–70. But contrary to the reasoning in *Diaz*, laws unrelated to firearms use are not proper analogues. This Court's precedent requires the government to show that a modern gun law aligns with our "historical tradition of *firearm* regulation." *Bruen*, 597 U.S. at 17 (emphasis added); *Rahimi*, 602 U.S. at 691 (same). In other words, the government's historical analogues must regulate *firearms*; capital punishment and estate forfeiture are not firearm regulations. Indeed, *Rahimi* relied only on historical laws that "specifically addressed firearms violence." 602 U.S. at 694–95. So did *Bruen*. *See* 597 U.S. at 38–66.

In justifying its reliance on capital punishment and estate forfeiture, however, *Diaz* asserted that *Rahimi* "consider[ed] several historical laws that were not explicitly related to guns." *Diaz*, 116 F. 4th at 468. But *Rahimi* says just the opposite. In *Rahimi*, this Court relied on two historical legal regimes—surety laws and going armed laws—that "*specifically addressed firearms violence*." 602 U.S. at 694–95 (emphasis added). To be sure, surety laws were not "passed *solely* for the purpose of regulating firearm possession or use." *Diaz*, 116 F. 4th at 468. But this Court

emphasized that, "*[i]mportantly for this case*, the surety laws also targeted the misuse of firearms." *Rahimi*, 602 U.S. at 696 (emphasis added). "The purpose of capital punishment in colonial America was threefold: deterrence, retribution, and penitence." *Diaz*, 116 F.4th at 469 (citation omitted). Targeting the misuse of firearms was *not* one of its purposes. Yet it was a primary purpose for permanent felon disarmament, which aimed "to keep firearms out of the hands of those who are 'a hazard to law-abiding citizens' and who had demonstrated that 'they may not be trusted to possess a firearm without becoming a threat to society.'" *Id.* (citation omitted). In other words, laws that did *not* target the misuse of firearms—like capital punishment and estate forfeiture—are *not* proper analogues.

Second, *Diaz* noted that this Court accepted a "greater-includes-the-lesser" argument in *Rahimi*. *Diaz*, 116 F. 4th at 469–70. This is true only insofar as in *Rahimi*, both the greater restriction (imprisonment under the going armed laws) and the lesser punishment (disarmament under 18 U.S.C. § 922(g)(8)) had *the same purpose*. *Rahimi* held that "if imprisonment was permissible to ***respond to the use of guns to threaten the physical safety of others,*** then the lesser restriction of temporary disarmament … is also permissible." 602 U.S. at 682 (emphasis added). But it does not follow, as *Diaz* concluded, that "if capital punishment was permissible to respond to theft, then the lesser restriction of permanent disarmament that § 922(g)(1) imposes is also permissible." *Diaz*, 116 F. 4th at 469. Capital punishment simply did not target gun violence. Because neither capital punishment nor estate

forfeiture establish a tradition of *firearm* regulation, this Court's precedent forecloses employing them as historical analogues for § 922(g)(1).

Third, an historical law must match both metrics to be considered relevantly similar — the why *and* the how — to serve as an analogue under *Bruen*. *Diaz* accordingly mis-stepped when it concluded that "[g]oing armed laws are relevant historical analogues to § 922(g)(1), just as *Rahimi* found them to be with respect to § 922(g)(8)." *Diaz*, 116 F.4th at 471. In short, "the justification behind going armed laws—to 'mitigate demonstrated threats of physical violence'—does not necessarily support a tradition of disarming [felons] whose underlying convictions do not inherently involve a threat of violence." *Diaz*, 116 F.4th at 471 n.5 (quoting *Rahimi*, 602 U.S. at 698). *Diaz* nonetheless relied on these historical laws because of a match on the "how" part of the test, ignoring the deficit on the "why." *See id.* ("We focus on these laws to address the 'how' of colonial-era firearm regulation, rather than the 'why,' which is supported by other evidence." (citing *Bruen*, 597 U.S. at 29)). This approach directly contradicts this Court's instruction to match an analogue on *both* metrics. *Connelly*, 117 F.4th at 274 (citing *Rahimi*, 602 U.S. at 692; *Bruen*, 597 U.S. at 27–30).

The comparison to *Rahimi* also glosses over a critical difference between § 922(g)(1) and § 922(g)(8)(C)(i), which "applies only once a court has found that the defendant 'represents a credible threat to the physical safety' of another." *Rahimi*, 602 U.S. at 699 (quoting 18 U.S.C. § 922(g)(8)(C)(i)). "That matches the . . . going armed laws," *Rahimi* reasoned, "which involved judicial determinations of whether a

particular defendant likely would threaten or had threatened another with a weapon." *Id.* As *Diaz* itself recognized, § 922(g)(1), unlike § 922(g)(8), casts its net irrespective of threats of violence. *Diaz*, 116 F.4th at 471 n.5. *Diaz* cannot excuse this incongruity by only half-applying *Bruen*.

Ultimately, there are no historical firearms laws that imposed the type of categorical, permanent disarmament effected by § 922(g)(1). The government therefore cannot overcome the presumption that § 922(g)(1) violates the Second Amendment. *See Bruen*, 597 U.S. at 24. The statute is unconstitutional, and this Court should grant certiorari.

C. This Court should intervene to resolve the Circuit split regarding the scope of the Second Amendment.

Not only was *Diaz* wrongly decided, but it deepened an intractable split among the Courts of Appeals regarding the scope of the Second Amendment right. The Fourth, Eighth, Ninth, Tenth, and Eleventh Circuits have held that § 922(g)(1) may be constitutionally applied to all felons. *See United States v. Duarte*, — F.4th —, No. 22-50048, 2025 WL 1352411 at *2 (9th Cir. May 9, 2025) (citing *United States v. Hunt*, 123 F.4th 697, 707–08 (4th Cir. 2024) (rejecting an as-applied challenge on a categorical basis); *United States v. Jackson*, 110 F.4th 1120, 1129 (8th Cir. 2024) (same); *Vincent v. Bondi*, 127 F.4th 1263, 1265–66 (10th Cir. 2025) (rejecting an as-applied challenge because neither *Bruen* nor *Rahimi* abrogated circuit precedent foreclosing such a challenge); *United States v. Dubois*, 94 F.4th 1284, 1293 (11th Cir. 2024), *cert. granted, judgment vacated*, — U.S. —, 145 S.Ct. 1041 (2025) (holding that *Bruen* did not abrogate circuit precedent foreclosing such challenges)).

The Third, Fifth, and Sixth Circuits remain open to as-applied challenges, but disagree on how to analyze such a challenge. The Fifth Circuit, as noted above, considers as-applied challenges by defendants whose relevant felonies were not punished "permanently and severely," that is, by death or estate forfeiture. *Diaz*, 116 F.4th at 472. More recently, the Fifth Circuit identified an additional ground for disarming an individual. In *Schnur*, the court held that the defendant's felony aggravated battery conviction was a "crime of violence" indicating that "he poses a threat to public safety and the orderly functioning of society[,]" and therefore, disarming him "is consistent with this Nation's historical tradition of firearm regulation and punishment of people who have been convicted of violent offenses." *United States v. Schnur*, 132 F.4th 863, 870 (5th Cir. 2025) (citations omitted) (cleaned up). Then, in *Betancourt*, the court looked to the facts of the defendant's felony aggravated assault convictions—in which he disregarded a red light, drove at 107 miles per hour, caused a major crash and seriously injured two people—and determined that he could be disarmed pursuant to *Schnur* because he "poses a threat to public safety." *United States v. Betancourt*, — F.4th —, No. 24-20070, 2025 WL 1571854 at *3 (5th Cir. Jun. 4, 2025) (quoting *Schnur*, 132 F.4th at 870) (internal quotation marks ommitted).

In the Sixth Circuit, however, the defendant bears the burden of proving that he is "not dangerous." *United States v. Williams*, 113 F.4th 637, 657 (6th Cir. 2024). And unlike in the Fifth Circuit—where, in conducting the dangerousness inquiry, the court may only consider "prior convictions that are punishable by imprisonment for a

term exceeding one year[,]" *Schnur*, 132 F. 4th at 867 (quoting *Diaz*, 116 F. 4th at 467) (cleaned up)—a Sixth Circuit court "may consider a defendant's *entire* criminal record—not just the specific felony underlying his § 922(g)(1) conviction." *Williams*, 113 F.4th at 659–60 (emphasis added).

Significantly, the Third Circuit upheld an as-applied challenge by an individual with a decades-old food stamp fraud conviction, holding that the government could not show a historical tradition of depriving people like him of his Second Amendment right. *Range v. Att'y Gen. U.S.*, 124 F.4th 218, 232 (3d Cir. 2024)(en banc). It adopted yet another standard, holding that § 922(g)(1) is unconstitutional as applied to someone who did not "'pose[ ] a physical danger to others' if armed[.]" *Pitsilides v. Barr*, 128 F.4th 203, 210 (3d Cir. 2025) (quoting *Range*, 124 F.4th at 232). It urged courts to "consider all factors that bear on a felon's capacity to possess a firearm without posing such a danger[,]" which includes an individual's "entire criminal history," and also "post-conviction conduct." *Id.* at 211–12.

In sum, disagreements abound — not only inter-circuit, but intra-circuit too. In *Range*, the en banc Third Circuit generated six opinions, including one dissent. The Ninth Circuit in *Duarte*, also en banc, generated four opinions, including one partial dissent. *Williams*, a panel decision, produced a concurrence in the judgment only. In short, judges "are currently at sea when it comes to evaluating firearms legislation[,]" and are in "need [of] a solid anchor for grounding their constitutional pronouncements." *Rahimi*, 602 U.S. at 747 (Jackson, J., concurring). Indeed, as the

inter and intra circuit splits demonstrate, there is a dire need for this Court to intervene.

D. In the alternative, the Court should hold the instant petition pending the resolution of another case presenting the same issue.

This Court should grant certiorari to decide this momentous issue. Several petitions raising facial challenges to § 922(g)(1) are pending before this Court,[1] including in *Diaz v. United States*, No. 24-6625 (U.S. Feb. 18, 2025). As noted earlier, the Fifth Circuit relied on *Diaz* in denying Mr. Matlock's claim below.

Should the Court grant certiorari in *Diaz*, or in another case presenting a facial challenge to § 922(g)(1), it should hold Mr. Matlock's petition pending the outcome. *See Lawrence on Behalf Lawrence v. Chater*, 516 U.S. 163, 166 (1996); *Stutson v. United States*, 516 U.S. 163, 181 (1996)(Scalia, J., dissenting)("We regularly hold cases that involve the same issue as a case on which certiorari has been granted and plenary review is being conducted *in order that* (if appropriate) they may be 'GVR'd' when the case is decided.")(emphasis in original).

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[1] Petitions raising facial challenges to § 922(g)(1) under the Second Amendment are also pending in *Mireles v. United States*, No. 24-7275 (U.S. May 20, 2025); *Johnson v. United States*, No. 24-7347 (U.S. May 30, 2025); *Toney v. United States*, No. 24-7253 (U.S. May 12, 2025); *Curry v. United States*, No. 24-7290 (U.S. May 22, 2025); *Mason v. United States*, No. 24-7286 (U.S. May 20, 2025); and *Charles v. United States*, No. 24-7168 (U.S. May 7, 2025).

CONCLUSION

Petitioner Dionte Dorun Matlock respectfully submits that this Court should grant *certiorari* to review the judgment of the United States Court of Appeals for the Fifth Circuit.

Respectfully submitted this 9th day of June, 2025.

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