

June 2, 2026

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

Re: *Saadeh v. New Jersey State Bar Association*, No. 25-1002

Dear Mr. Harris:

Pursuant to Supreme Court Rule 32.3, petitioner, Rajeh A. Saadeh, seeks to lodge with the Court certain non-record material in connection with the above case.

In its brief in opposition, respondent suggested that this case might be partially moot because respondent has changed the criteria for members who may run for its set-aside diversity board seats. *See* BIO.18. Under the new criteria, the argument goes, petitioner is free to apply because he is a member of a “diversity bar association”—specifically, the New Jersey Muslim Lawyer’s Association. BIO.7-8.

Petitioner seeks to lodge a declaration that is signed by him under penalty of perjury. The original declaration has been provided to respondent’s counsel. It swears as follows:

1. I am an individual over twenty-one years of age, of sound mind, have never been convicted of a felony, am capable of making this declaration, and am fully competent to declare the matters below.
2. When I initially filed this case, the New Jersey State Bar Association reserved five at-large seats on its board of trustees for members of certain demographic groups.
3. After my state-court litigation became final, the Bar Association announced that at least some of the at-large seats on its board of trustees would be open to members “who are in any of the following under-represented groups”: “Hispanic/Latino/a/x; Asian/Pacific American; Black/African American; LGBTQ+; women; lawyers over the age of 70; attorneys with disabilities/differing abilities; and attorneys who are members of a diversity bar association as recognized in the NJSBA Policy Manual at Section IV, Paragraph 1.”

4. I do not belong to any of the groups identified above. Though I once was a member of the New Jersey Muslim Lawyers Association—and even served as its president—my membership lapsed. For reasons entirely unrelated to this litigation, I did not renew my membership in that association.
5. As when I filed this suit, I remain ineligible for any of the at-large seats that are reserved for certain underrepresented groups.
6. And as when I filed this suit, I remain sincerely interested and would immediately apply once a court orders the Bar Association to stop discriminating based on race. I remain an attorney licensed in New Jersey. I remain a member of the New Jersey State Bar Association. From 2019 to 2021, I served on the Bar Association’s board as a young lawyer’s division designee. In January 2016, I unsuccessfully applied for one of the at-large seats on the board of trustees. And in August 2020, I unsuccessfully applied for one of the at-large seats on the nominating committee.

As required by Rule 32.3, petitioner will not submit the original, signed version of this declaration to the Court until this request is granted.

Lodging this declaration is proper under this Court’s Rule 32.3. It addresses jurisdictional issues, including mootness and standing, that respondent raised for the first time after the proceedings below concluded and the record closed. *See, e.g.*, Rule 32.3 Ltr. (May 2, 2022), *SFFA v. Harvard*, No. 20-1199, perma.cc/G473-P6H9 (proposing to lodge declarations that prove SFFA still has members who are “ready and able to apply to transfer” to Harvard); Rule 32.3 Ltr. (Oct. 18, 2023), *Speech First v. Sands*, No.23-156, perma.cc/YJL5-KEHH (lodging declaration concerning mootness issue in response to petition for certiorari). And it addresses basic factual issues, including petitioner’s status and past applications, that respondent already knows and cannot dispute.

For all these reasons, petitioner respectfully asks to lodge with the Court the non-record material identified above.

Sincerely,

/s/ Cameron T. Norris
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Counsel for Petitioner

cc: All counsel of Record with declaration