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October 4th, 2025

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

RE: Submission of Supplemental Brief

Case Name: Bradberry v. Department of the Air Force
Docket Number: No. 25-5541

Dear Mr. Harris,

Please find enclosed the following documents for filing in the above-referenced matter, in which I am proceeding pro se:

Original Supplemental Brief: One (1) original, signed copy.

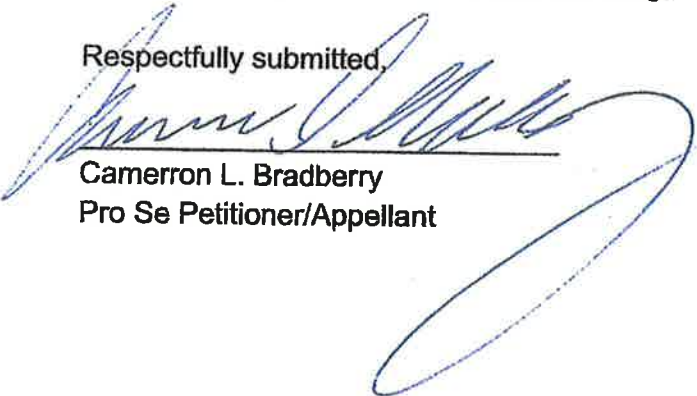
Copies of Supplemental Brief: Ten (10) true copies thereof, prepared in conformity with Rule 33.2.

Certificate of Service: One (1) original, signed copy, certifying service on the Respondent, the Department of the Air Force, via the Solicitor General.

This Supplemental Brief is being filed pursuant to the Rules of the Supreme Court to bring new, pertinent authority to the Court's attention.

Thank you for your assistance with this filing.

Respectfully submitted,



Camerron L. Bradberry
Pro Se Petitioner/Appellant

No. 25-5541

IN THE
Supreme Court of the United States

CAMERRON L. BRADBERRY,

Petitioner,

v.

DEPARTMENT OF THE AIR FORCE,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF
APPEALS FOR THE FEDERAL CIRCUIT

SUPPLEMENTAL BRIEF FOR PETITIONER

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Petitioner, Pro Se

INTRODUCTION

Pursuant to Supreme Court Rule 15.8, Petitioner Camerron L. Bradberry respectfully files this supplemental brief to bring to the Court's attention intervening matter not available at the time his petition for a writ of certiorari was filed. These recent developments, including a new government-wide rule from the Office of Personnel Management (OPM) and subsequent federal court litigation, confirm the exceptional national importance of the questions presented in the petition and demonstrate a compelling need for this Court's immediate review.

INTERVENING MATTER

Since the filing of the petition in this case, the legal landscape concerning the due process rights of federal employees has been fundamentally altered by the Executive Branch itself.

1. New OPM Rule in 2025. The Office of Personnel Management issued a final rule, Civil Service Rule XI, that dramatically changes the process for terminating probationary employees and redefines the employment status of those with prior federal service. This rule directly addresses the central legal question of this Petition: whether a career employee with prior service loses all rights to their statutory and constitutional due process rights by being treated as a probationary employee.

2. Subsequent Federal Court Litigation. The 2025 OPM rule immediately triggered widespread litigation. On [Date of Litigation Decision, e.g., September 18, 2025], the U.S. District Court for [District, e.g., the Northern District of California] ruled that the mass termination of probationary employees conducted under the authority of this new rule were unlawful. This ruling highlights that the issue is not only of national importance but is also a live, unsettled legal controversy currently being litigated in the lower courts.

ARGUMENT

These intervening events transform the petition from a request to correct a past error into an urgent plea to resolve a present and future systemic conflict affecting the entire federal civil service.

I. The New OPM Rule and Ensuing Litigation Confirm the Issue's National Importance.

The Solicitor General's waiver of response implied that Petitioner's case was a fact-specific dispute of no broad consequence. The government's own actions now prove the contrary. OPM's decision to issue a government-wide rule demonstrates that the employment status and due process rights of employees with prior service is a systemic issue of the gravest importance to the administration of the federal workforce. The subsequent lawsuits confirm that this is not a settled matter. Without guidance from this Court, a "circuit split" is not merely possible but inevitable, leading to a patchwork of rights for federal employees.

II. The Executive Action is Untenable Under This Court's Recent Administrative Law Precedent.

The new OPM rule raises a fundamental **Separation of Powers** question: whether the Executive Branch, through regulation, can alter or diminish rights established by Congress' statute and guaranteed by the Constitution. This Court's recent administrative law decisions reinforce the judiciary's role as the final arbiter of such statutory questions.

- The Court's ruling in ***Loper Bright Enterprises v. Raimondo***, 604 U.S. 2024 (2024), which overturned the principle of *Chevron* deference, mandates that this Court, not OPM, must definitively interpret the limits of the Civil Service Reform Act (CSRA). The OPM rule is an aggressive interpretation of existing law that should be afforded **zero deference** when it conflicts with established employee rights.

- Similarly, ***Corner Post, Inc. v. Board of Governors of the Federal Reserve System***, 601 U.S. 427 (2024), limits the legal protections afforded to long-settled administrative rules. This precedent reinforces that the legality of the controversial OPM rule is fair game for immediate judicial review, despite the agency's assertion of finality.

III. The OPM Rule Unlawfully Strips Employees of Established Constitutional Due Process Rights.

The new OPM rule attempts to disregard the long-standing principle that a public employee with a protected **property interest** in their employment cannot be terminated without due process.

- Under ***Cleveland Board of Education v. Loudermill***, 470 U.S. 532 (1985), an employee who has such a property interest must be afforded notice and an opportunity to be heard *before* termination. The OPM rule's unilateral removal of this right for a class of federal employees is a clear violation of this precedent.
- Applying the ***Mathews v. Eldridge***, 424 U.S. 319 (1976), three-part test, the OPM rule fails constitutional scrutiny. The employee's private interest in continued employment is substantial; the risk of erroneous deprivation without safeguards is dramatically increased; and the government's interest in speed does not outweigh the employee's fundamental interest in constitutional fairness.

IV. Statutory and Fundamental Fairness Require Intervention.

The Petition's central claim—that a career employee was stripped of statutory protections—is supported by this Court's willingness to protect whistleblower and employee safeguards.

- ***Murray v. UBS Securities, LLC***, 601 U.S. 427 (2024), confirms the Court's focus on maintaining strong, functional statutory protections against government and corporate overreach. The principle that statutory safeguards for employees must be honored is directly implicated where OPM attempts to strip rights explicitly granted by Congress.
- The principle of fundamental fairness recognized by this Court in ***Gideon v. Wainwright***, 372 U.S. 335 (1963)—that no person should be forced to face a powerful governmental adversary without essential legal safeguards—is analogous to the profound deprivation of a property interest at issue here. Allowing an agency to unilaterally strip a career employee of statutory and constitutional due process protections creates

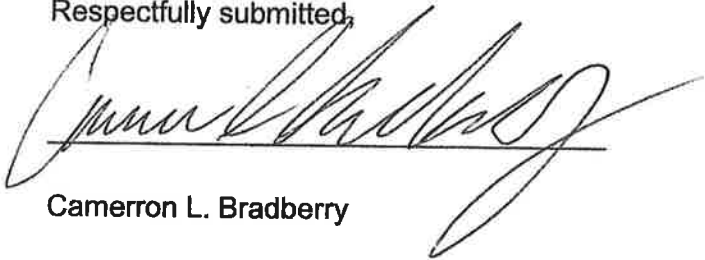
an inherently unbalanced and fundamentally unfair process that this Court must correct.

CONCLUSION

These intervening matters and controlling precedents demonstrate compelling reasons for granting the petition. The questions presented are no longer hypothetical or isolated; they are part of a live, nationwide legal conflict over the fundamental rights of federal employees, administrative agency power, and the separation of powers.

For the foregoing reasons, the petition for a writ of certiorari should be granted

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Camerron L. Bradberry', is written over a horizontal line.

Camerron L. Bradberry

Petitioner, Pro Se

Date: October 4, 2025