

Via Electronic Filing

September 15, 2025

The Honorable Scott S. Harris
Clerk, Supreme Court of the United States
One First Street, NW
Washington, DC 20543

Re: No. 25A264, *Trump v. Slaughter*

Dear Mr. Harris:

I represent Gwynne Wilcox, a member of the National Labor Relations Board. In Ms. Wilcox's case (which remains pending in the D.C. Circuit), this Court previously denied the government's request for certiorari before judgment to address the constitutionality of the removal restriction governing the NLRB. *Trump v. Wilcox*, 145 S. Ct. 1415 (2025).

Today, the respondent in *Trump v. Slaughter*, which involves the removal restriction governing the Federal Trade Commission, acquiesced in the government's request for certiorari before judgment. *See* Opp. to Stay at 39–40, *Trump v. Slaughter*, No. 25A264. In Ms. Wilcox's view, it remains true that the issues presented in these cases are "better left for resolution after full briefing and argument." *Wilcox*, 145 S. Ct. at 1415.

I write to inform the Court that Ms. Wilcox, in an abundance of caution, has filed a petition for certiorari before judgment requesting that, if the Court is nonetheless inclined to grant review now in any case, it should grant review in Ms. Wilcox's case. We ask that the Court consider Ms. Wilcox's filing as it evaluates the government's application in *Slaughter*.

Sincerely,

/s/ Deepak Gupta
Deepak Gupta

Counsel for Gwynne Wilcox

cc: Counsel of record