

No. 25A312
IN THE
Supreme Court of the United States

DONALD J. TRUMP,
President of the United States, et al.,
Applicants,
v.

LISA D. COOK,
Respondent.

**STATE OF FLORIDA’S MOTION FOR LEAVE TO FILE
AMENDED *AMICUS* BRIEF**

The State of Florida, 21 other States, and the Arizona Legislature move this Court for leave to file the accompanying amended *amicus curiae* brief in support of the Applicants. The grounds for that relief are as follows.

1. On September 18, 2025, the Applicants sought a stay in this Court of the district court’s preliminary injunction reinstating Respondent Lisa Cook to her position on the Federal Reserve Board. Within a week, the State of Florida, joined by numerous other States and the Arizona Legislature, filed its *amicus* brief in support of a stay. That brief expressed *amici*’s view that the lower courts had “erred on the merits,” *see* Br. of Florida et al. at 1, but—given the limited time available to draft *amicus* submissions in the expedited posture of a stay request—focused primarily on the district court’s lack of remedial authority to order the Respondent’s reinstatement. *See id.* at 2–13.

2. On October 1, this Court deferred ruling on the stay application until oral argument could be held in January 2026. Order of 10/1/25. It also instructed the clerk to “establish a briefing schedule for *amici curiae* and any supplemental briefs responding to *amici*.” *Id.* The clerk then directed that “[a]ny brief for an *amicus curiae* under Rule 37.4 must be filed on or before Wednesday, October 29, 2025,” and allowed the parties to file supplemental briefs responding to *amici*. Order of 10/9/25.

3. With the benefit of this additional time for *amicus* briefing, Florida has undertaken to supplement its earlier submission. Its proposed amended brief, filed simultaneously with this request for leave, offers *amici*’s perspective on relevant history supporting the Applicants’ reading of the “for cause” provision of the Federal Reserve Act. That history reflects how courts, both state and federal, interpreted the phrase “for cause” in the decades preceding enactment of the Federal Reserve Act to accord broad deference to the Executive when assessing for-cause removals. To date, much of that history has gone undiscussed in the briefs filed in this Court.

4. No party would be prejudiced by granting Florida leave to amend its *amicus* brief, as both parties will have the opportunity to file supplemental briefs responding to any *amicus* briefs.

5. Counsel for Florida has consulted counsel for the parties regarding this motion. The Applicants consent to the motion, and the Respondent takes no position.

/s/ Jeffrey P. DeSousa
Counsel of Record

October 29, 2025