

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

REBECCA KELLY SLAUGHTER, in her official
and personal capacities, and ALVARO M.
BEDOYA, in his official and personal capacities,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, ANDREW N.
FERGUSON, in his official capacity as Chair of
the Federal Trade Commission, MELISSA
HOLYOAK, in her official capacity as
Commissioner of the Federal Trade Commission,
and DAVID B. ROBBINS, in his official capacity
as the Executive Director of the Federal Trade
Commission,

Defendants.

Case No. 25 Civ. 909

Judge Loren L. AliKhan

MOTION FOR EXPEDITED SUMMARY JUDGMENT

For the reasons set forth in more detail in the accompanying memorandum, statement of undisputed facts, and supporting declarations, Plaintiffs Rebecca Kelly Slaughter and Alvaro M. Bedoya respectfully move under Federal Rule of Civil Procedure 56 for an order granting expedited summary judgment in their favor. On March 18, 2025, President Trump purported to remove Plaintiffs, Commissioners Slaughter and Bedoya, in violation of the FTC Act, *see* 15 U.S.C. § 41 and nearly a century of Supreme Court precedent. Defendants Ferguson, Robbins, and Holyoak have since sought to implement that attempted unlawful removal by taking actions that effectively bar Plaintiffs from performing their duties as FTC Commissioners.

Because there is no dispute about the facts here and the governing law is clear, there is no barrier to proceeding straight to summary judgment in this matter. Given the importance of the proper functioning of the Commission, as well as the ongoing confusion regarding Plaintiffs'

status as duly appointed FTC Commissioners, Plaintiffs respectfully request that this Court, in lieu of preliminary injunction proceedings, set a schedule for the consideration of this motion on as accelerated of a schedule as the Court deems practicable and appropriate.

Immediately before filing, counsel for Plaintiffs emailed a copy of this motion and all accompanying documents, as well as the complaint in the case, to the Assistant Directors for the Federal Programs Branch of the Department of Justice.

Dated: April 11, 2025

Respectfully submitted,

CLARICK GUERON REISBAUM LLP

By: /s/ Aaron Crowell

Aaron Crowell (*admitted pro hac vice*)

Gregory A. Clarick (*admitted pro hac vice*)

David Kimball-Stanley (*admitted pro hac vice*)

41 Madison Avenue, 23rd Floor

New York, NY 10010

Tel.: (212) 633-4310

acrowell@cgr-law.com

gclarick@cgr-law.com

dkimballstanley@cgr-law.com

PROTECT DEMOCRACY PROJECT, INC.

Benjamin L. Berwick (D.D.C. Bar No.

MA0004) 15 Main Street, Suite 312

Watertown, MA 02472

Tel.: (202) 579-4582

ben.berwick@protectdemocracy.org

Amit Agarwal (D.C. Bar No. 90002013)

Beau Tremiere (*admitted pro hac vice*)

2020 Pennsylvania Ave. NW, Suite # 163

Washington, DC 20006

Tel.: (202) 579-4582

amit.agarwal@protectdemocracy.org

beau.tremiere@protectdemocracy.org

Jared F. Davidson (*admitted pro hac vice*)
3014 Dauphine Street,
Suite New Orleans, LA
70117 Tel.: (202) 579-582
jared.davidson@protectdemocracy.org

*Attorneys for Plaintiffs Rebecca Kelly Slaughter and
Alvaro M. Bedoya*

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2025, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. District Court for the District of Columbia using the CM/ECF system. All participants not served by the CM/ECF system have been served in accordance with FRCP 5 and LCvR 5.4(d). A paper copy of the foregoing motion and all accompanying documents has been served on each defendant, the Attorney General, and the United States Attorney for the District of Columbia. In addition, the motion and all accompanying documents have been emailed to the Assistant Directors for the Federal Programs Branch of the Department of Justice.

Dated: April 11, 2025

/s/ Aaron Crowell

Aaron Crowell (*admitted pro hac vice*)