Christine M. Buzzard

Of Counsel

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Christine M. Buzzard is of counsel in the Washington, D.C., office of Gibson, Dunn. She is a member of the firm's Litigation Department and its Appellate and Constitutional Law and Administrative Law and Regulatory Practice Groups.

Christine's practice focuses on high-stakes commercial, administrative law, and constitutional litigation. She represents clients in bet-the-company trial and appellate matters and focuses on crafting strategy designed to press novel arguments, take advantage of recent legal developments, and secure durable victories. She also specializes in complex challenges to federal agency action and other significant regulatory disputes, including securing victories before agencies and federal courts involving major federal programs and industry-wide issues. Christine has served as the lead drafter on dozens of briefs involving a range of legal issues—including administrative law, insurance, and deceptive trade practices—and regularly counsels clients as they confront their most significant litigation and regulatory challenges.

Representative matters include:

- *Good Samaritan Medical Center, Inc. v. The Leapfrog Group*, 25-cv-80526 (S.D. Fla.) – Played a central role in a sweeping federal bench-trial victory for five hospitals against The Leapfrog Group, securing injunctive relief halting a widely used hospital rating system that the court found "deceptive and punitive" and lacking scientific basis. Developed and executed trial strategy; served as lead drafter on all briefing; and argued several key motions, including a dispositive motion at trial. The trial team was recognized as *Litigation Daily*'s "Litigator of the Week."
- *Delta Air Lines, Inc. & Aerovias de Mexico S.A. de C.V., v. Department of Transportation*, No. 25013456 (11th Cir.) – Secured a critical stay of a Department of Transportation order terminating approval of a major international airline joint venture between Delta and Aeromexico, in litigation alleging arbitrary and capricious agency action under the Administrative Procedure Act.
- *REH Co., LLC v. Environmental Protection Agency*, No. 25-1180 (D.C. Cir.) – Represents small refineries in challenges to EPA decisions denying small-refinery exemptions under the Renewable Fuel Standard program. Prevailed in a severed case requiring EPA to evaluate eligibility based on a single-year dataset, rather than the agency's prior multi-year approach. The team was recognized by *Litigation Daily* as "Litigator of the Week Runner-Up."
- *BNSF Railway Co. v. Federal Railroad Administration*, No. 24-60576 (5th Cir.); Union *Pacific Railroad Co. v. Federal Railroad Administration*, No. 24-3284 (8th Cir.); *CSX Transportation, Inc. v. Federal Railroad Administration*, No. 24-13683 (11th Cir.) – Served as lead brief drafter in coordinated appellate challenges arguing that agency inaction constituted unlawfully withheld action under the Administrative Procedure Act. In each case—as well as several related matters that

Capabilities

Appellate and Constitutional Law
Administrative Law and Regulatory Practice
Litigation

Credentials

Education

Yale University - 2013 Juris Doctor
University of Pennsylvania - 2010 Bachelor of Arts
University of Pennsylvania - 2010 Bachelor of Science- Economics

Admissions

Pennsylvania Bar
District of Columbia Bar

Clerkships

US Supreme Court, Hon. Clarence Thomas, 2022 - 2023
US Court of Appeals, DC Circuit, Hon. Janice Rogers Brown, 2016 - 2017
USDC, Southern District of New York, Hon. Richard J. Sullivan, 2015 - 2016

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had not yet resulted in litigation—the agency subsequently acted on and granted the requested relief.

- *Reynolds Family Revocable Trust U/A Dated 04/08/2015 v. Schwab, et al*., No. 23-cv-02938 (N.D. Cal.) – Secured dismissal with prejudice of a derivative action against Charles Schwab's directors and officers relating to its robo-advisor product, with the court adopting Schwab's arguments in full.
- *Federal Trade Commission v. PepsiCo., Inc.*, No. 25-664 (S.D.N.Y.) – Persuaded the FTC to voluntarily dismiss Robinson-Patman Act claims alleging price discrimination under Sections 2(d) and 2(e), a statute largely dormant for decades. In dismissing the complaint, FTC leadership issued statements adopting Pepsi's legal theory and statutory interpretation.

Christine rejoined the firm in 2024 after serving for more than five years at the Office of Legal Counsel in the United States Department of Justice, where she received the Attorney General's Award for Distinguished Service. In that role, she advised the White House Counsel, Attorney General, and senior officials across the executive branch on complex constitutional, administrative, and separation of powers issues. Her work included advising on over 200 executive orders and over 100 pieces of legislation across a wide range of subject areas, from the First Amendment to national security, and from taxation to energy regulation.

Christine served as a law clerk to Justice Clarence Thomas of the Supreme Court of the United States, Judge Janice Rogers Brown of the United States Court of Appeals for the District of Columbia Circuit, and Judge Richard J. Sullivan of the United States District Court for the Southern District of New York.

She earned her J.D. from Yale Law School, where she served as an Editor on the *Yale Law Journal* and won the Morris Tyler Moot Court of Appeals Competition. Christine graduated *summa cum laude* from the University of Pennsylvania, earning a Bachelor of Science in Economics from the Wharton School and a Bachelor of Arts in Political Science from the College of Arts and Sciences.

Christine is admitted to practice in the District of Columbia and the Commonwealth of Pennsylvania, as well as before the Supreme Court of the United States and the U.S. Courts of Appeals for the Fifth, Eighth, Eleventh, and District of Columbia Circuits.

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