

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-1287

LEARNING RESOURCES, INC., ET AL., PETITIONERS

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.

ON WRIT OF CERTIORARI BEFORE JUDGMENT
TO THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 25-250

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.,
PETITIONERS

v.

V.O.S. SELECTIONS, INC., ET AL.

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

**APPLICATION FOR LEAVE TO FILE A REPLY BRIEF
IN EXCESS OF THE WORD LIMIT**

The Solicitor General, on behalf of the respondents in No. 24-1287 and petitioners in No. 25-250, respectfully requests leave to file a consolidated reply brief on the merits in excess of the 6,000-word limit in Rule 33.1(g)(vii), not to exceed 9,000 words.

Petitioners in No. 24-1287 and respondents in No. 25-250 do not oppose this request.

On September 9, 2020, this Court granted the government's petition for a writ of certiorari and motion to expedite in No. 25-250. The petition presented two questions: (1) whether the International Emergency Economic Powers Act (IEEPA), Pub. L. No. 95-223, Tit. II, 91 Stat. 1626, authorizes tariffs imposed by President Trump; and (2) if so, whether IEEPA unconstitutionally delegates legislative authority to the President. On the same day, the Court also granted the petition for a writ of certiorari before judgment in No. 24-1287, realigned the parties' briefing, and consolidated the case with No. 25-250. The government's consolidated opening brief is to be filed by September 19, 2025; responding briefs from petitioners in No. 24-1287 and respondents in No. 25-250 are to be filed by October 20, 2025; and the government's consolidated reply brief is to be filed by October 30, 2025.

The grant and consolidation of No. 24-1287 requires addressing a threshold jurisdictional issue in addition to the two questions presented in the petition for a writ of certiorari in No. 25-250. The government also understands that the private respondents and state respondents in No. 25-250 intend to file separate briefs on the merits.

Accordingly, the government's consolidated reply brief will have to address three separate response briefs, with an additional jurisdictional issue, on a highly expedited schedule. The government thus respectfully requests leave to file a consolidated reply brief on the merits in excess of the 6,000-word limit in Rule 33.1(g)(vii), not to exceed 9,000 words. Justices of the Court often grant leave to file merits briefs in excess of the word limits in analogous circumstances. E.g., Fuld v. Palestine Liberation Org., No. 24A795 (Feb. 21, 2025); FCC v. Consumers' Research, No. 24A754 (Jan. 24, 2025); Chiafalo v. Washington, No. 19A894 (Feb. 14, 2020), Trump v. Mazars USA, LLP, No. 19A773 (Jan. 13, 2020).

Respectfully submitted.

D. JOHN SAUER
Solicitor General
Counsel of Record

SEPTEMBER 2025