

In the Supreme Court of the United States

DONALD J. TRUMP, IN HIS OFFICIAL CAPACITY AS PRESIDENT OF THE UNITED STATES,

ET AL.,

Petitioners,

v.

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

Respondents.

LEARNING RESOURCES, INC., ET AL.,

Petitioners,

v.

DONALD J. TRUMP, ET AL.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Federal Circuit and On
Writ of Certiorari Before Judgment to the United States Court of Appeals for the District of
Columbia Circuit

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Jay Alan Sekulow, a member of the Bar of this Court and an attorney for amicus curiae American Center for Law and Justice, pursuant to Rule 33.1(h), hereby certifies that the Brief Amicus Curiae of the American Center for Law and Justice in Support of Petitioners in No. 25-250 complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding page one and all material following the last word of the text of the conclusion), contains 4,254 words.

/s/ Jay Alan Sekulow

Jay Alan Sekulow

September 23, 2025