

Nos. 24-1287 & 25-250

In the
Supreme Court of the United States

LEARNING RESOURCES, INC., ET AL.,
Petitioners,

v.

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

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

v.

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

CERTIFICATE OF COMPLIANCE

I, Alan B. Morrison, counsel of record for the amicus curiae Consumer Watchdog do hereby certify, pursuant to Rule 33.1(h) of this Court, that its Brief in Support of the Petitioners in No. 24-1287 and the Respondents in No. 25-250, contains 7139 words, including footnotes, excluding the portions set forth in Rule 33.1(d).


Alan B. Morrison

October 8, 2025