IN THE

Supreme Court of the United States

LEARNING RESOURCES, INC., ET AL.,

Petitioners,

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

Respondents.

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

Petitioners,

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

Respondents.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Accountability Center as *Amicus Curiae* in Support of Petitioners in No. 24-1287 and Respondents in No. 25-250 contains 5,567 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2025.

<u>/s/ Brianne J. Gorod</u> Brianne J. Gorod

Counsel for Amicus Curiae