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.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, hereby certify on this 24th day of October, 2025, that the Brief of *Amicus Curiae* for National Security Officials Supporting Petitioners in No. 24-1287 and Respondents in No. 25-250 contains 6,754 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow Meaghan VerGow