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.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

> BRIEF FOR TAX LAW PROFESSORS AS AMICI CURIAE IN SUPPORT OF PETITIONERS IN NO. 24-1287 AND RESPONDENTS IN NO. 25-250

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,805 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.

Sworn to and subscribed before me this 24th day of October 2025.

AZA SALINDER DONNER

NOTARY PUBLIC

District of Columbia

My commission expires April 30, 2029.

