

CERTIFICATE OF COMPLIANCE

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.,

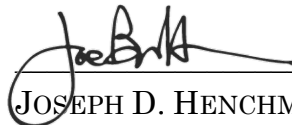
Petitioners,

V.

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

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of National Taxpayers Union Foundation as *Amicus Curiae* in Support of Petitioners in No. 24-1287 and Respondents in No. 25-250 contains 7,116 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henchman, declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2025.



JOSEPH D. HENCHMAN

Counsel of Record

NATIONAL TAXPAYERS UNION FOUNDATION

122 C Street N.W. #700

Washington, DC 20001

jbh@ntu.org

(703) 683-5700