

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

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

V.

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

*ON WRIT OF CERTIORARI BEFORE JUDGMENT TO THE UNITED STATES COURT OF
APPEALS FOR THE DISTRICT COLUMBIA CIRCUIT AND ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE FEDERAL CIRCUIT*

CERTIFICATE OF COMPLIANCE WITH WORD COUNT LIMITATIONS

John M. Colvin, a member of the Bar of this Court and an attorney for amicus curiae American College of Tax Counsel, hereby certifies, pursuant to Rule 33.1(h) that the Amicus Curiae Brief of the American College of Tax Counsel in support of Petitioners in No. 24-1287 and Respondent in No. 25-250 complies with the applicable word count limitations. Excluding portions not subject to limitation, the body of the document, including footnotes, contains 7,819 words.

/s/ _____
John M. Colvin

October 24, 2025