

IN THE
Supreme Court of the United States

LEARNING RESOURCES, INC., *et al.*, *Petitioners*,

v.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES,
IN HIS OFFICIAL CAPACITY, *et al.*, *Respondents*.

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, *et al.*, *Petitioners*,

v.

V.O.S. SELECTIONS, INC., *et al.*, *Respondents*.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Paul R.Q. Wolfson, a member of the bar of this Court, certify that the accompanying Brief of Amici Curiae Scholars of the History of Constitutional Law and the Presidency in Support of Petitioners in No. 24-1287 and Respondents in No. 25-250 contains 7,763 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on October 24, 2025.

/s/ Paul R.Q. Wolfson

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