

IN THE
Supreme Court of the United States

DONALD J. TRUMP, ET AL.,

Petitioners,

v.

BARBARA, ET AL.,

Respondents.

**On Writ of Certiorari Before Judgment to the
United States Court of Appeals for the First
Circuit**

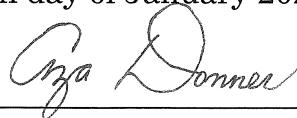
**BRIEF OF KIRKWOOD INSTITUTE, INC., AND LEGAL
SCHOLARS HANS A. VON SPAKOVSKY & AMY E.
SWEARER AS AMICI CURIAE IN SUPPORT OF RESPONDENT**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the document contains 3,957 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 27th day of January 2026.



AZA SALINDER DONNER
NOTARY PUBLIC
District of Columbia

My commission expires April 30, 2029.

