

IN THE  
**Supreme Court of the United States**

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

v.

BARBARA, *et al.*,  
*Respondents.*

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

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**BRIEF OF PROFESSOR AMANDA L. TYLER  
AS *AMICUS CURIAE*  
IN SUPPORT OF RESPONDENTS**

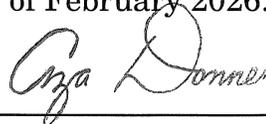
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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the document contains 6,677 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 25th day of February 2026.



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AZA SALINDER DONNER  
NOTARY PUBLIC  
District of Columbia

My commission expires April 30, 2029.

