

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

*Plaintiffs,*

v.

DONALD J. TRUMP, *et al.*,

*Defendants.*

No. 1:25-cv-1248

UNOPPOSED MOTION FOR LEAVE  
TO FILE *AMICUS CURIAE* BRIEF  
IN SUPPORT OF DEFENDANTS' MOTION TO TRANSFER

America First Legal Foundation respectfully requests that the Court grant leave to file the attached *amicus curiae* brief in support of Defendants' motion to transfer this action to the Court of International Trade. Plaintiffs take no position on this motion; Defendants do not oppose the motion.

1. "An *amicus* brief should normally be allowed ... when the *amicus* has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide." *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008).

2. *Amicus* agrees with Defendants that this case should be transferred, and *Amicus* submits the attached proposed brief providing an additional basis for doing so. As part of *Amicus*'s commitment to the rule of law, it seeks to ensure that principles of jurisdiction are strictly enforced, and *Amicus* wishes to bring its additional arguments to the Court's attention given that they implicate the Court's subject matter jurisdiction.

April 25, 2025

Respectfully submitted,

/s/ R. Trent McCotter

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**CERTIFICATE OF SERVICE**

I certify that on this date, the foregoing was filed electronically with the Court's electronic filing system. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

Respectfully submitted,

/s/ R. Trent McCotter

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