

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

LEARNING RESOURCES, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:25-cv-01248-RC
	)	
DONALD J. TRUMP, President of the United	)	
States, in his official capacity, et al.,	)	
	)	
Defendants.	)	

**NOTICE OF SUPPLEMENTAL AUTHORITY**

Defendants respectfully notify the Court of the attached decision of the U.S. Court of International Trade in *Barnes v. United States*, No. 25-cv-00043, ECF No. 15 (Ct. Int’l Trade May 23, 2025). That case, as here, challenged the President’s imposition of tariffs under the International Emergency Economic Powers Act (IEEPA).

The court in *Barnes* ultimately dismissed the action for lack of standing, but as pertinent here, it first assessed its statutory jurisdiction and concluded it was “satisfied that it has Section 1581(i) jurisdiction over this case.” *Id.* at 5-10. The court explained that the “President has determined to exercise [IEEPA] authority through the imposition of tariffs” and that “[i]n one of the U.S. Court of International Trade’s earliest cases, the Court recognized that it had jurisdiction over an action challenging the imposition of a duty by the President” under identical language in IEEPA’s predecessor, the TWEA. *Id.* at 8. The court further noted that “the tariffs challenged by Plaintiff are, at least in part, targeted at controlling the illicit flow of drugs or migrants, not raising revenue, which satisfies the criteria articulated in 28 U.S.C. § 1581(i)(1)(B).” *Id.* at 9. And the court affirmed that the “Court of International Trade’s exclusive jurisdiction over tariff cases is significant” because it “consolidat[es] this area of administrative law” in the one forum

“with an already developed expertise in international trade and tariff matters.” *Id.* at 6-7.

DATED: May 23, 2025

Respectfully submitted,

OF COUNSEL:

YAAKOV M. ROTH  
Acting Assistant Attorney General

ALEXANDER K. HAAS  
Director

ERIC J. HAMILTON  
Deputy Assistant Attorney General

STEPHEN M. ELLIOTT  
Assistant Director  
U.S. Department of Justice  
Civil Division  
Federal Programs Branch

PATRICIA M. McCARTHY  
Director

/s/ Claudia Burke  
CLAUDIA BURKE  
Deputy Director

SOSUN BAE  
Senior Trial Counsel  
LUKE MATHERS  
BLAKE W. COWMAN  
COLLIN T. MATHIAS  
Trial Attorneys  
U.S. Department of Justice  
Civil Division  
Commercial Litigation Branch

/s/ Justin R. Miller  
JUSTIN R. MILLER  
Attorney-In-Charge  
International Trade Field Office

/s/ Catherine M. Yang  
CATHERINE M. YANG  
Trial Attorney  
U.S. Department of Justice  
Civil Division  
Commercial Litigation Branch  
PO Box 480, Ben Franklin Station  
Washington, DC 20044  
(202) 514-4336  
catherine.m.yang@usdoj.gov  
*Attorneys for Defendants*