IN THE UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT

V.O.S. SELECTIONS, INC., et al., Plaintiffs-Appellees, v. DONALD J. TRUMP, et al., Defendants-Appellants.	No. 25-1812
STATE OF OREGON, et al., Plaintiffs-Appellees, v. DONALD J. TRUMP, et al., Defendants-Appellants.	No. 25-1813

MOTION TO CONSOLIDATE APPEALS

The government moves to consolidate these two appeals, which arise from two cases decided in a single opinion by the Court of International Trade, for briefing and argument in this Court. Plaintiffs-appellees in *State of Oregon* do not oppose this motion; plaintiffs-appellees in *V.O.S. Selections* oppose this motion.

1. These appeals arise from separate suits filed in the Court of International Trade (CIT). Both suits challenge the imposition of tariffs by the President under the

International Emergency Economic Powers Act (IEEPA) in response to declared national emergencies. The cases were not consolidated in the CIT, but a three-judge panel of the CIT heard both cases and resolved both in a single opinion, holding that IEEPA did not authorize the imposition of the tariffs at issue here. That opinion is attached for the Court's reference. The government filed a notice of appeal in each case. *See* Nos. 25-1812, 25-1813.

2. Because these appeals concern a single opinion issued by the CIT applying the same reasoning across both cases, they should be treated together to avoid duplicative briefing or unnecessary filings. Accordingly, the government respectfully requests that the appeals be consolidated.

3. We have sought the position of counsel for appellees in both cases. Plaintiffs-appellees in *State of Oregon* do not oppose this motion; plaintiffs-appellees in *V.O.S. Selections* oppose this motion.

Respectfully submitted,

MICHAEL S. RAAB

/s/ *Brad Hinshelwood*

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CERTIFICATE OF COMPLIANCE

This motion complies with the type-volume limit of Federal Rule of Appellate Procedure 27(d)(2)(A) because it contains 225 words. This motion was prepared using Microsoft Word 2013 in Garamond, 14-point font, a proportionally-spaced typeface.

/s/ *Brad Hinshelwood*
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