

DONALD J. TRUMP, *et al.*,

*Cross-Petitioners,*

v.

INTERNATIONAL REFUGEE ASSISTANCE PROJECT, *et al.*,

*Cross-Respondents.*

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CERTIFICATION OF COMPLIANCE

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As required by Supreme Court Rule 33.1(h), I certify that the Memorandum for Cross-Respondents in *Trump v. International Refugee Assistance Project* contains 344 words, excluding the parts of the Memorandum that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2018.

/s/ Omar C. Jadwat

Omar C. Jadwat

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