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December 13, 2017

Clerk  
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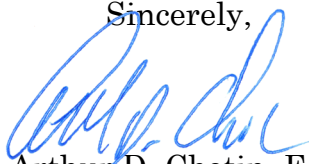
**RE No. 17-801: IN RE UNITED STATES OF AMERICA, *ET AL.***

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Legal Scholars as *Amici Curiae* in Opposition to Petition for Writ of Mandamus referenced above contains **3,870** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.  
Principal