In The Supreme Court of the United States

NATIONAL REVIEW, INC.

Petitioner,

 $\mathbf{v}.$

MICHAEL E. MANN,

Respondent.

COMPETITIVE ENTERPRISE INSTITUTE AND RAND SIMBERG,

Petitioners,

v.

MICHAEL E. MANN,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Walter M. Weber, a member of the Bar of this Court and an attorney for amicus, pursuant to Rule 33.1(h), hereby certifies that the Amicus Brief of the American Center for Law and Justice in Support of Petitioners complies with the pertinent word limitations. The body of the document, including footnotes (but exclusive of all material preceding the Interest of Amicus and all material following the last word of the text of the conclusion), contains 1,085 words.

Walter M. Weber