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March 6, 2019

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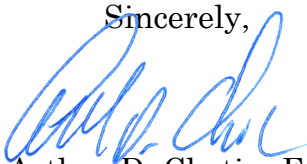
**RE: NO. 18-966: UNITED STATES DEPARTMENT OF COMMERCE, *ET AL.* V. STATE OF
NEW YORK, *ET AL.***

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation in Support of Petitioners referenced above contains **4,023** 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