## No. 19-161

## In The Supreme Court of the United States

 $\label{eq:definition} \textbf{DEPARTMENT OF HOMELAND SECURITY, et al.,}$ 

Petitioners,

v.

VIJAYAKUMAR THURAISSIGIAM,

Respondent.

## CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of *Amici Curiae* Immigration Scholars in Support of Respondent contains 6,733 words and complies with the word limitation established by Rule 33.1(g)(xiv) of the Rules of this Court.

Dated: January 22, 2020

Joshua S. Lipshutz