IN THE

Supreme Court of the United States

DEPARTMENT OF HOMELAND SECURITY, et al., Petitioners.

v.

VIJAYAKUMAR THURAISSIGIAM, Respondent.

ON WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Noah A. Levine, a member of the bar of this Court, certify that the accompanying Brief for Scholars of the Law of Habeas Corpus as Amici Curiae Supporting Respondent contains 6,869 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on January 22, 2020.

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