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March 1, 2021

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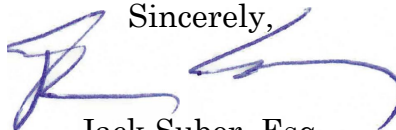
**RE 19-251: AMERICANS FOR PROSPERITY FOUNDATION V. XAVIER BECERRA,  
ATTORNEY GENERAL OF CALIFORNIA**  
**RE 19-255: THOMAS MORE LAW CENTER V. XAVIER BECERRA, ATTORNEY GENERAL  
OF CALIFORNIA**

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 the Allied Educational Foundation referenced above contains **2,948** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 1st day of March 2021.

