In the Supreme Court of the United States

Donald J. Trump, et al, Petitioners,

v.

Mazars USA, LLP, et al, Respondents.

Donald J. Trump, et al., Petitioners,

v.

Deutsche Bank AG., et al., Respondents.

CERTIFICATE OF COMPLIANCE

As required by the Rule 33.1(h), I certify that the *Brief of Amicus Curiae of Professor W. Burlette Carter on Subject Matter Jurisdiction and in Support of Reversal* contains 7893 words, excluding the parts of the brief that are exempted by the Rules.

Executed on January 31, 2020

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