CERTIFICATE OF COMPLIANCE

Nos. 19-840, 19-1019

California, et al.,
Petitioners/Cross-Respondents,
v.
Texas, et al.,
Respondents/Cross-Petitioners.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Center for Constitutional Jurisprudence in support of Respondents/Cross-Petitioners in the above-referenced cases contains 3,112 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on July 2, 2020

John C. Eastman

Counsel for *Amicus Curiae* Center for Constitutional

Jurisprudence