No. 19-930



INTERNAL REVENUE SERVICE; DEPARTMENT OF TREASURY, UNITED STATES OF AMERICA,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Unopposed Motion for Leave to File Brief Out of Time in the above-entitled case contains 211 words excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Partnership For Conservation As *Amicus Curiae* In Support Of Petitioner in the above-entitled case contains 4,790 words excluding 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.

Executed on July 28, 2020

Jude MElliott

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