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March 29, 2021

Clerk
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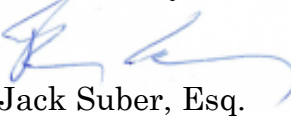
RE NO. 20-1195: KANSAS NATURAL RESOURCE COALITION V. DEPARTMENT OF THE INTERIOR, ET AL.

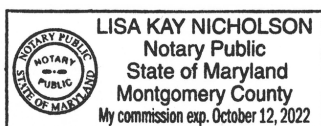
Dear Sir or Madam:

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 **2,562** 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 29th day of March 2021.

