

Supreme Court of the United States United States Courts of Appeals

CERTIFICATE OF COMPLIANCE

No. 20-1195

KANSAS NATURAL RESOURCE COALITION,

Petitioner,

v.

UNITED STATES DEPARTMENT OF INTERIOR, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Plaintiff's Petition for Writ of Certiorari contains 3,504 words, excluding the parts of the Petition that are exempted by Supreme Court Rule 33.1(d).

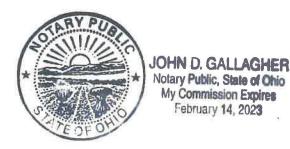
I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 31, 2021.

Emily Mullins Becker Gallagher Legal Publishing, Inc. 8790 Governor's Hill Drive, Suite 102 Cincinnati, OH 45249 (800) 890-5001 Sworn to and subscribed before me by said Affiant on the date designated below.

Date: March 31, 2021 John J. Juliu Notary Public

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