

2311 Douglas Street  
Omaha, Nebraska 68102-1214

1-800-225-6964  
(402) 342-2831  
Fax: (402) 342-4850



E-Mail Address:  
contact@cocklelegalbriefs.com

Web Site  
www.cocklelegalbriefs.com

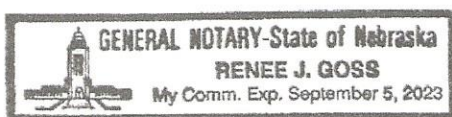
No. 20-138

DONALD J. TRUMP,  
PRESIDENT OF THE UNITED STATES, et al.,  
Petitioners,  
v.  
SIERRA CLUB, et al.,  
Respondents.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE RUTHERFORD INSTITUTE AS AMICUS CURIAE IN SUPPORT OF RESPONDENTS AND AFFIRMANCE in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 2493 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 18th day of January, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cockle*  
Affiant