Nos. 20-1530, 20-1531, 20-1778 & 20-1780

IN THE SUPREME COURT OF THE UNITED STATES

STATE OF WEST VIRGINIA, ET AL.,

 \mathbf{v}

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

THE NORTH AMERICAN COAL CORPORATION

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

WESTMORELAND MINING HOLDINGS LLC

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

THE STATE OF NORTH DAKOTA

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen in Support of Respondents contains 5,520 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on January 25, 2022.

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