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March 1, 2021

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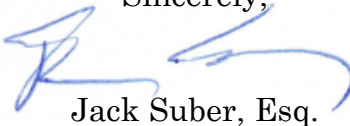
**RE 20-315: JOSE SANTOS SANCHEZ, ET AL. V. ALEJANDRO N. MAYORKAS,  
SECRETARY OF HOMELAND SECURITY, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Professors Alan Morrison and Brian Wolfman referenced above contains **7,408** 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 1st day of March 2021.

