



CERTIFICATE OF COMPLIANCE

No. 20-331

DONALD J. TRUMP, PRESIDENT OF THE  
UNITED STATES,

*Petitioner,*

v.

DISTRICT OF COLUMBIA, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition contains 7,416 words, excluding the parts of the Brief 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 December 14, 2020.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: December 14, 2020

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023