CERTIFICATE OF COMPLIANCE

No. 20-366

Donald J. Trump, President of the United States, $et\ al.$, Appellants, v. New York, $et\ al.$, Appellees.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* U.S. REPS. MORRIS JACKSON "MO" BROOKS, JR., BRADLEY BYRNE, AND ROBERT ADERHOLT IN SUPPORT OF APPELLANTS in the above-referenced cases contains 7,867 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 October 30, 2020

John C. Eastman

Counsel for Amicus Curiae