In the Supreme Court of the United States

LEBAMOFF ENTERPRISES, INC., ET AL. Petitioners,

v.

GRETCHEN WHITMER, GOVERNOR OF MICHIGAN, ETAL. Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33(1)(h), I certify that the *Amici Curiae* Brief in Support of the Petition for a Writ of Certiorari complies with the word limitations in Rule 33(1)(g). It contains 4,480 words, including footnotes, but excluding sections exempted from the word count by Rule 33(1)(d).

This the 17th day of August 2020.

/s/ J. Gregory Troutman
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