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December 18, 2020

Supreme Court of the United States
One First Street, N.E.
Washington, D.C. 20543
Attn.: Scott S. Harris
Clerk of the Court

Re: *King v. Whitmer*
Docket No. 20-815

Dear Mr. Harris:

I certify that my *Amicus Curiae* brief in the above-referenced matter contains 1,852 words that count toward the applicable word limit.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

s/ Todd C. Bank

Todd C. Bank