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No. 20-827

UNITED STATES OF AMERICA,  
Petitioner,

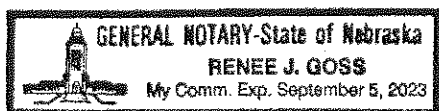
v.

ZAYN al-ABIDIN MUHAMMAD HUSAYN,  
aka ABU ZUBAYDAH, et al.,  
Respondents.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the AMICUS CURIAE BRIEF FOR CURRENT AND FORMER U.N. SPECIAL RAPORTEURS IN SUPPORT OF RESPONDENTS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 7902 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 19th day of August, 2021.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant