

CERTIFICATE OF COMPLIANCE

No. 20-827

UNITED STATES OF AMERICA,

Petitioner,

v.

ZAYN AL-ABIDIN MUHAMMAD HUSAYN, A.K.A. ABU ZUBAYDAH, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amici Curiae National Religious Campaign Against Torture; Church of the Brethren, Office of Peacebuilding and Policy; General Synod of the United Church of Christ; National Advocacy Center of the Sisters of the Good Shepherd; Congregation of Our Lady of Charity of the Good Shepherd, U.S. Provinces; Alliance of Baptists; Friends Committee on National Legislation; Maryknoll Office for Global Concerns; and Reconstructionist Rabbinical Association in Support of Respondents and Affirmance contains 7,888 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 August 20, 2021.

Emily Mullins

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

Notary Public

[seal]

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