No. 20-827

IN THE SUPREME COURT OF THE UNITED STATES

UNITED STATES OF AMERICA,

Petitioner,

v.

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

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying Brief of Amicus Curiae Public Citizen contains 7,207 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on August 19, 2021.

WENDY LIU

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