

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 21-1086, 21-1087

JOHN H. MERRILL, etc., *et. al.*,

*Petitioners,*

v.

EVAN MILLIGAN, *et. al.*,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Amicus Brief on behalf of the Respondents in the foregoing case contains 4,713 words, excluding the parts of the document 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 July 18, 2022.

*/s/ Jeffrey T. Green*

JEFFREY T. GREEN\*  
SIDLEY AUSTIN LLP  
1501 K Street NW  
Washington, DC 20005  
(202) 736-8291  
*jgreen@sidley.com*