

SUPREME COURT OF THE UNITED STATES  
No.

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Enron Nigeria Power Holding, Limited,  
*Petitioner,*

v.

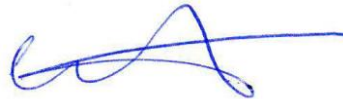
United States of America and Federal Republic of Nigeria,  
*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h),  
I certify that the document contains 6,369 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 February 8<sup>th</sup>, 2022



\_\_\_\_\_  
Candice Best

Sworn to and subscribed before me  
this 8<sup>th</sup> day of February, 2022



\_\_\_\_\_  
**Mariana Braylovskiy**  
Notary Public State of New York  
No. 01BR6004935  
Qualified in Richmond County  
Commission Expires March 30, 2022

#310810