



CERTIFICATE OF COMPLIANCE

No. 21-1394

JOHN FITISEMANU, PALE TULI, ROSAVITA TULI, AND
SOUTHERN UTAH PACIFIC ISLANDER COALITION,

Petitioners,

v.

UNITED STATES OF AMERICA, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief in Opposition for Respondents American Samoa Government and the Honorable Aumua Amata contains 8,943 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 29, 2022.

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

Date: August 29, 2022

John D. Gallagher
Notary Public

[seal]



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