In the Supreme Court of the United States

ARIZONA, ET AL.,

Petitioners,

v.

NAVAJO NATION, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief in Opposition of the Navajo Nation in *Arizona, et al. v. Navajo Nation, et al.*, S. Ct. No. 21-1484, complies with the word limitations, because it contains 3,722 words, excluding the parts of the document exempted by Rules 33.1(d) and 24.1(f).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 23, 2022

Shay Dvoretzky