## IN THE

## Supreme Court of the United States

PHILIP E. BERGER, et al.,

Petitioners,

v.

NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al.,

Respondents.

On Writ of Certiorari to the United States Court of Appeals for the Fourth Circuit

## CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae of Lawyers Democracy Fund and Representative Rodney Davis in Support of Petitioners contains 7,998 words, excluding parts of the document that are exempted by Supreme Court Rule 33.1(d).

Dated: January 18, 2022

RICHARD B. RAILE

Baker & Hostetler LLP

1050 Connecticut Ave., N.W., Suite 1100

Washington, D.C. 20036

(202) 861-1711

rraile@bakerlaw.com