IN THE

Supreme Court of the United States

DEB HAALAND, SECRETARY, U.S. DEPARTMENT OF THE INTERIOR, et al.,

Petitioners, Cross-Respondents,

 \mathbf{v}

Chad Everet Brackeen, $et\ al.$,

Respondents, Cross-Petitioners.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Brief for Individual Petitioners contains 18,794 words and complies with the word limitation established by this Court's March 31, 2022 order.

Dated: May 26, 2022

/s/ Lochlan F. Shelfer

Lochlan F. Shelfer