CERTIFICATE OF COMPLIANCE

No. 21-507

LAWYERS UNITED INC., EVELYN AIMEE DEJESÚS, AND ALLAN WAINWRIGHT,

Petitioner(s),

v.

UNITED STATES, ET AL.,

Respondent(s).

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF FOR SARKARLAW AS AMICUS CURIAE IN SUPPORT OF PETITIONERS contains 3,606 words, excluding the parts of the BRIEF FOR SARKARLAW AS AMICUS CURIAE IN SUPPORT OF PETITIONERS 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 November 4, 2021.

Julian Sarkar