IN THE SUPREME COURT OF THE UNITED STATES

No. 21-588
UNITED STATES,
Petitioner,
v.
STATE OF TEXAS, et al.,
Respondents

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* American Bar Association contains 2,447 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Executed October 27, 2021.

REGINALD M. TURNER