RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 21-954

JOSEPH R. BIDEN, JR. ET. AL.,

Petitioners,

v.

STATE OF TEXAS, STATE OF MISSOURI

Respondents.

As required by Supreme Court Rule 33.1(h), I, Karen C. Tumlin, certify that the Amicus Brief in support of the petitioners on the merits in the foregoing case contains 7,432 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 on March 21, 2022.

/S/ Karen C. Tumlin

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