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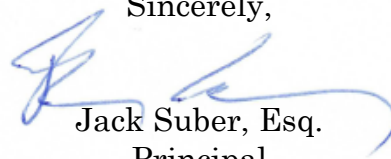
**RE NO. 21A658: LOUISIANA, ET AL. V. JOSEPH R. BIDEN, JR., PRESIDENT OF THE
UNITED STATES, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Manufactured Housing Association for Regulatory Reform referenced above contains **2,994** 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.

Sincerely,


Jack Suber, Esq.
Principal



Sworn and subscribed before me this 9th day of May 2022.

