In the Supreme Court of the United States

RELENTLESS, INC., ET AL.,

Petitioners,

DEPARTMENT OF COMMERCE, ET AL., Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae Historians Gautham Rao, Richard R. John, and Jane Manners in Support of Respondents in the above referenced case contains 7,956 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 December 22, 2023

Thomas P. Wolf

Brennan Center for Justice of

NYU School of Law

120 Broadway

Suite 1750

New York, NY 10271

(646) 292-8310

wolft@brennan.law.nyu.edu

Counsel of Record for Amici Curiae Gautham Rao, Richard R. John, and

Jane Manners