

IN THE
Supreme Court of the United States

WIKIMEDIA FOUNDATION,
Petitioner,

v.

NATIONAL SECURITY AGENCY / CENTRAL SECURITY
SERVICE, *et al.*,
Respondents.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Meaghan VerGow, a member of the bar of this Court, certify on this 29th day of September 2022, that the Brief of Former Federal Judges as *Amici Curiae* in Support of Petitioner in the above-captioned case contains 5,833 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Meaghan VerGow
Meaghan VerGow