## In The

## Supreme Court of the United States

JEAN FRANCOIS PUGIN,

Petitioner,

v.

MERRICK B. GARLAND, Attorney General,

Respondent.

MERRICK B. GARLAND, Attorney General,

Petitioner,

v.

FERNANDO CORDERO-GARCIA,

Respondent.

On Petition for Writs of Certiorari to the United States Court of Appeals for the Fourth and Ninth Circuit

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION IN SUPPORT OF THE PETITIONER PUGIN AND RESPONDENT CORDERO-GARCIA contains 5,680 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 24, 2023.

CALEB J. KRUCKENBERG
Counsel of Record

Pacific Legal Foundation

3100 Clarendon Blvd., Ste. 610 Arlington, VA 22201 202.888.6881 CKruckenberg@pacificlegal.org

Counsel for Amicus Curiae Pacific Legal Foundation