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August 10, 2022

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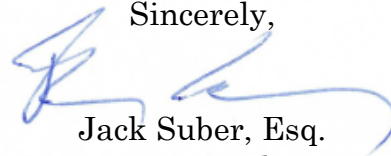
RE NO. 22-30: DAVID RITTER V. LINDA MIGLIORI, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation referenced above contains **3,488** 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 10th day of August 2022.

