CERTIFICATE OF COMPLIANCE No. 22-323

IN THE Supreme Court of the United States

OAKBROOK LAND HOLDINGS, LLC, ET AL.

Petitioners,

V.

COMMISSIONER OF INTERNAL REVENUE,

Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File Brief of *Amicus Curiae* and Brief of *Amicus Curiae* National Taxpayers Union Foundation in Support of Petitioners in the above-entitled case contains 5,910 words, as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henchman, declare under penalty of perjury that the foregoing is true and correct. Executed on November 7, 2022.

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JOSEPH D. HENCHMAN* *Counsel of Record NATIONAL TAXPAYERS UNION FOUNDATION 122 C Street N.W. #700 Washington, DC 20001 jbh@ntu.org (703) 683-5700