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November 23, 2022

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 22-379: ARKANSAS TIMES LP V. MARK WALDRIP, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* The Forum for Constitutional Rights and The Foundation for Individual Rights and Expression referenced above contains **2,977** 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 23rd day of November 2022.

Lisa K Nicholson