In the Supreme Court of the United States

DEPARTMENT OF THE INTERIOR, ET AL.,

Petitioners,

υ.

NAVAJO NATION, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief in Opposition of the Navajo Nation in *Department of the Interior, et al. v. Navajo Nation, et al.*, S. Ct. No. 22-51, complies with the word limitations, because it contains 8,998 words, excluding the parts of the document exempted by Rules 33.1(d) and 24.1(f).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 23, 2022

Shay Dvoretzky