IN THE Supreme Court of the United States

 $\begin{array}{c} \text{Harry C. Calcutt, III,} \\ Petitioner, \\ \text{v.} \end{array}$

Federal Deposit Insurance Corporation, Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of the Separation of Powers Clinic as Amicus Curiae in Support of Petitioner contains 2761 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed March 1, 2023.

____/s/ R. Trent McCotter____ R. Trent McCotter Counsel of Record