No. 22-859

IN THE

Supreme Court of the United States

SECURITIES AND EXCHANGE COMMISSION,

Petitioner,

v.

GEORGE R. JARKESY, JR. AND PATRIOT28, L.L.C.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 29.5, I hereby certify that the Brief for Morris & Dickson as *Amicus Curiae* in *SEC v. Jarkesy*, No. 22-859, complies with the word limitations, as it contains 7,998 words, excluding the words exempted by Supreme Court Rule 33.1(d).

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

Date: October 10, 2023

Hashim M. Mooppan