IN THE SUPREME COURT OF THE UNITED STATES

No. 22-913

Richard Devillier, et al.,

Petitioners

v.

Texas,

Respondent.

Certificate of Compliance With Word Limitation

In accordance with Supreme Court Rule 33.1(h), the undersigned certifies that the Brief of Atlantic Legal Foundation as *Amicus Curiae* In Support of Petitioners complies with the applicable word limit set forth in Rule 33.1(g): Exclusive of the exempted portions identified in Rule 33.1(d), the brief contains **3,712 words**. (Consistent with Rule 33.1(d), the undersigned is relying on the word count utility in Microsoft Word (Microsoft 365), the word processing program used to prepare the brief.)

/s/ Lawrence S. Ebner Lawrence S. Ebner Atlantic Legal Foundation 1701 Pennsylvania Ave., NW Washington, DC 20006 (202) 729-6337 lawrence.ebner@atlanticlegal.org

November 20, 2023