CERTIFICATE OF COMPLIANCE No. 22O154

In The Supreme Court of the United States

NEW HAMPSHIRE, Plaintiff, v. Massachusetts, Defendant.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* National Taxpayers Union Foundation, et al. in Support of the Motion for Leave to File in the above-entitled case contains 4,443 words, as the preparer of the document and as measured by the word processing software and excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). I, Joseph D. Henchman, declare under penalty of perjury that the foregoing is true and correct. Executed on December 22, 2020.

JOSEPH D. HENCHMAN*
122 C Street N.W. #650
Washington, DC 20001
(202) 766-5019
jbh@ntu.org
Counsel for Amici Curiae

*Counsel of Record