

IN THE SUPREME COURT OF THE UNITED STATES

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No. 23-108

JAMES E. SNYDER

v.

UNITED STATES OF AMERICA

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CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

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I, Terence H. Campbell, counsel for *amicus curiae* and a member of the Bar of this Court, certify that the Brief for the International Union of Operating Engineers, Local 150, AFL-CIO as *Amicus Curiae* in Support of Petitioner in the above-captioned case contains 2,612 words, excluding the portions that are exempted by Rule 33.1(d).

/s/ Terry Campbell  
Terence H. Campbell  
Counsel for *Amicus Curiae*  
International Union of Operating  
Engineers, Local 150, AFL-CIO

February 12, 2024