In the Supreme Court of the United States

No. 23-108

JAMES E. SNYDER, PETITIONER

v.

UNITED STATES OF AMERICA, RESPONDENT.

CERTIFICATE OF COMPLIANCE

As required by Rule 33.1(h), I, Leon Dayan, counsel for *Amicus Curiae* Laborers' International Union of North America and a member of the Bar of this Court, certify that the *Brief of Amicus Curiae Laborers' International Union of North America in Support of Petitioner* complies with the typeface requirement of Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 6014 words, excluding the parts that are exempted by Rule 33.1(d), as needed.

Respectfully submitted, this 12th Day of February, 2024,

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