IN THE Supreme Court of the United States

AMERICAN PETROLEUM INSTITUTE, ET AL.,

Petitioners,

v.

STATE OF MINNESOTA,

Respondent.

On Petition for a Writ of Certiorari to the United States Court of Appeals for the Eighth Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, William M. Jay, counsel of record and a member of the Bar of this Court, certify this 21st day of September, 2023, that the Brief for the Chamber of Commerce of the United States as *Amicus Curiae* Supporting Petitioners contains 5,998 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

September 21, 2023

William M. Jay GOODWIN PROCTER LLP 1900 N Street, N.W. Washington, D.C. 20036 *wjay@goodwinlaw.com* (202) 346-4000

Counsel for Amicus Curiae