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October 16, 2023

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 23-171: CHRIS QUINN, ET AL. V. WASHINGTON, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Washington Policy Center, Opportunity for All Coalition, Americans for Tax Reform, California Policy Center, Grassroot Institute of Hawaii, Illinois Policy Institute, Independence Institute, National Taxpayers Union Foundation, Manhattan Institute, Mountain States Policy Center, Oklahoma State Chamber Research Foundation, Reason Foundation, and Tax Foundation referenced above contains **4,157** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely, Jack Suber, Esq. Principal



Sworn and subscribed before me this 16th day of October 2023.

Nakolson