

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 23-334

DEPARTMENT OF STATE, ET AL.,

Petitioners,

v.

SANDRA MUÑOZ, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I, Mary Smith, certify that the Brief Of American Bar Association As Amicus Curiae In Support Of Respondents in the foregoing case contains 2,923 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.

Executed on March 28, 2024.

/s/ Mary Smith
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