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December 7, 2023

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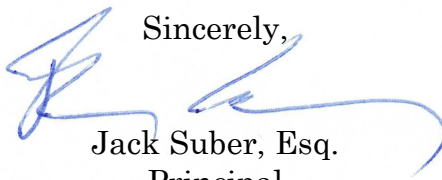
RE NO. 23-486: SIDNEY POWELL, ET AL. V. GRETCHEN WHITMER, GOVERNOR OF MICHIGAN, ET AL.

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Judicial Watch, Inc. referenced above contains **3,695** 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 7th day of December 2023.

