

**IN THE  
SUPREME COURT OF THE UNITED STATES**

SIDNEY POWELL, BRANDON JOHNSON, HOWARD KLEINHENDLER, JULIA HALLER, GREGORY ROHL & SCOTT HAGERSTROM, Petitioners,	)	No. 23-486
	)	On Petition for Writ of
	)	<i>Certiorari</i> to the U.S. Court of
	)	Appeals for the Sixth Circuit
v.	)	
	)	
GRETCHEN WHITMER, JOCELYN BENSON, CITY OF DETROIT, MICHIGAN, <i>ET AL.</i> , Respondents.	)	

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the supplemental brief “Petitioners’ Supplemental Brief on *FBI v. Fikre*, No. 22-1178 (Mar. 19, 2024)” filed on behalf of Sidney Powell, Brandon Johnson, Howard Kleinhendler, Julia Haller, Gregory Rohl, and Scott Hagerstrom in the above-captioned matter contains 3,000 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 26, 2024.

/s/ Lawrence J. Joseph  
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