In the Supreme Court of the United States

UNITED STATES OF AMERICA,

Petitioner,

v.

DONALD J. TRUMP,

Respondent.

On Petition for a Writ of Certiorari Before Judgment to the United States Court of Appeals for the D.C. Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF ALABAMA AND 18 OTHER STATES AS *AMICI CURIAE* IN SUPPORT OF RESPONDENT DONALD J. TRUMP contains 3,416 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on December 20, 2023.

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