

Supreme Court of the United States United States Courts of Appeals

## **CERTIFICATE OF COMPLIANCE**

No. 23-719

DONALD J. TRUMP,

Petitioner,

v.

## NORMA ANDERSON, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Professor Kurt T. Lash as *Amicus Curiae* in Support of Petitioner contains 7,202 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on January 16, 2024.

Donna J. Moore Becker Collocker La LD Mark

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Sworn to and subscribed before me by said Affiant on the date designated below.

Date: 1-16.2024 Notary Public

[seal]



DOUGLAS S. MOORE Notary Public, State of Ohio My Commission Expires December 18, 2027