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January 18, 2024

Clerk  
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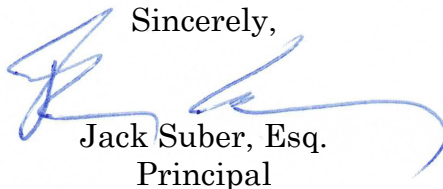
**RE 23-719: DONALD J. TRUMP V. NORMA ANDERSON, ET AL.**

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation referenced above contains **4,305** 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 18th day of January 2024.

