

**In the Supreme Court of the United States**

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DONALD J. TRUMP,

*Petitioner,*

v.

NORMA ANDERSON, *et al.*,

*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

I, Michael B. Kimberly, counsel for amici curiae Edward B. Foley, Benjamin L. Ginsberg, and Richard L. Hasen, and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this amicus brief in support of neither party contains 5,520 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

  
Michael B. Kimberly