

No. 23-719

In the Supreme Court of the United States

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DONALD J. TRUMP, PETITIONER

v.

NORMA ANDERSON, ET AL

ON WRIT OF CERTIORARI
TO THE SUPREME COURT OF COLORADO

CERTIFICATE OF COMPLIANCE

Attorneys for Amicus Curiae Secretary Benson, hereby certify that the foregoing Brief of Amicus Curiae Michigan Secretary of State Jocelyn Benson in Support of Neither Party complies with the type-volume limitation of Supreme Court Rule 33.1(g)(xi), in that the word-processing system used to prepare the brief indicates that the brief contains 2,031 words.

Respectfully submitted,

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