

IN THE
Supreme Court of the United States

PRESIDENT DONALD J. TRUMP,

Applicant,

v.

UNITED STATES OF AMERICA,

Respondent.

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Constitutional Law Scholars as *Amici Curiae* in Opposition to Application for Stay of the Mandate is 21 pages, 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.

Executed on February 13, 2024.

/s/ Brianne J. Gorod

Brianne J. Gorod

Counsel for *Amici Curiae*