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June 9, 2025

Clerk
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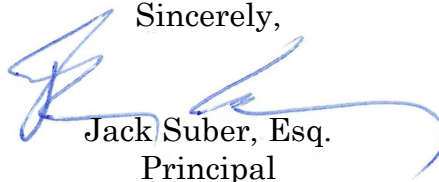
**RE No. 24-1151: BDO USA, LLP v. NEW ENGLAND CARPENTERS
GUARANTEED ANNUITY AND PENSION FUNDS, ET AL.**

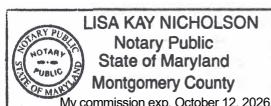
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Washington Legal Foundation referenced above contains **2,941** 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 9th day of June 2025.

