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June 30, 2025

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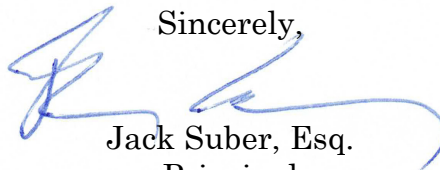
**RE NO. 24-482: HOLSEY ELLINGBURG, JR. V. UNITED STATES**

Dear Sir or Madam:

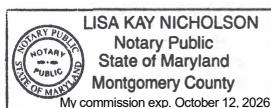
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Beth A. Colgan referenced above contains **6,972** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 31<sup>st</sup> day of July by 2025.

