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

JEFF ANDERSEN, SECRETARY,  
KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT,  
IN HIS OFFICIAL CAPACITY,  
*Petitioner,*

v.

PLANNED PARENTHOOD OF KANSAS  
AND MID-MISSOURI, ET AL,  
*Respondents.*

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**CERTIFICATE OF WORD COUNT**

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As required by Supreme Court Rule 33.1(h), I certify that the Brief *Amicus Curiae* of Americans United for Life in Support of Petitioner contains 4,888 words, excluding 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 the 20 day of April 2018.



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