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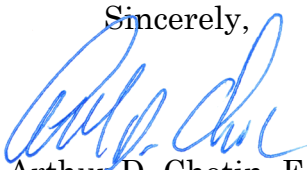
RE: NO. 18-1451: NATIONAL REVIEW, INC. V. MICHAEL E. MANN

Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Judicial Watch, Inc. in Support of Petitioner referenced above contains **2,767** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

As a member of the Supreme Court Bar, I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Arthur D. Chotin, Esq.
Principal