

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 18-1451

National Review, Inc.,

Petitioner,

v.

Michael E. Mann,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jonathan F. Cohn, certify that the Brief of 21 U.S. Senators as *Amici Curiae* in Support of Petitioner in the foregoing case contains 2,785 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.

Executed on July 3, 2019.

/s/ Jonathan F. Cohn
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