

No. 19-161

IN THE
Supreme Court of the United States

DEPARTMENT OF HOMELAND SECURITY, ET AL.,
Petitioners,

v.

VIJAYAKUMAR THURAISSIGIAM,
Respondent.

**On Writ of Certiorari to the
United States Court of Appeals
for the Ninth Circuit**

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Anton Metlitsky, a member of the bar of this Court, certify on this 22nd day of January 2020, that the Brief of Legal Historians as *Amici Curiae* in Support of Respondent in the above-captioned case contains 7,488 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Anton Metlitsky
Anton Metlitsky