
IN THE
Supreme Court of the United States

UNITED STATES AGENCY FOR INTERNATIONAL
DEVELOPMENT, *ET AL.*,

Petitioners,

v.

ALLIANCE FOR OPEN SOCIETY
INTERNATIONAL, INC., *ET AL.*,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Douglas Dunham, counsel for *amicus curiae* Washington Legal Foundation (WLF) and a member of the Bar of this Court, certify under Supreme Court Rule 33.1(g) and (h) that WLF's brief in this case contains 3,834 words, excluding the parts of the brief exempted by Supreme Court Rule 33.1(d).



DOUGLAS W. DUNHAM
Counsel of Record
DECHERT LLP
1095 Avenue of the Americas
New York, NY 10036
(212) 698-3500
douglas.dunham@dechert.com

*Counsel for Amicus Curiae
Washington Legal Foundation*

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