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No. 19-67

UNITED STATES OF AMERICA,  
Petitioner,

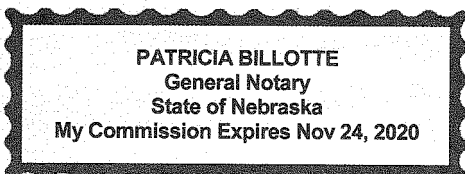
v.

EVELYN SINENENG-SMITH,  
Respondent.

### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF THE RUTHERFORD INSTITUTE, THE AMERICAN CIVIL LIBERTIES UNION, THE AMERICAN CIVIL LIBERTIES UNION OF NORTHERN CALIFORNIA, AND THE SERVICE EMPLOYEES INTERNATIONAL UNION AS AMICI CURIAE SUPPORTING RESPONDENT in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 6860 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 20th day of January, 2020.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Patricia C. Billotte*  
\_\_\_\_\_  
Notary Public

*Andrew H. Cockle*  
\_\_\_\_\_  
Affiant