

**CERTIFICATE OF COMPLIANCE**

**Nos. 19-715 and 19-760**

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DONALD J. TRUMP, *et al.*,

*Petitioners,*

– v. –

MAZARS USA, LLP, *et al.*,

*Respondents.*

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DONALD J. TRUMP, *et al.*,

*Petitioners,*

– v. –

DEUTSCHE BANK AG, *et al.*,

*Respondents.*

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As required by Supreme Court Rule 33.1(h), I certify that the brief for *amicus curiae* contains 5,761 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

s/Nikolina Gurfinkel  
Nikolina Gurfinkel

Sworn to on this 10th day of  
February, 2020