

March 29, 2021

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

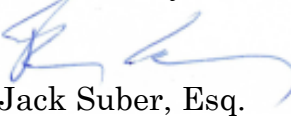
RE NO. 20-1195: KANSAS NATURAL RESOURCE COALITION V. DEPARTMENT OF THE INTERIOR, ET AL.

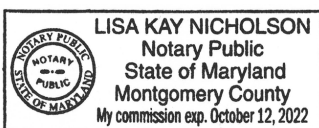
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and the Allied Educational Foundation referenced above contains **2,562** 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.

Sincerely,


Jack Suber, Esq.
Principal



RUD ☐ BEUEERUBW ☐ DBI ☐ ODUF ☐

