



CERTIFICATE OF COMPLIANCE

No. 20-1195

KANSAS NATURAL RESOURCE COALITION,

Petitioner,

v.

U.S. DEPARTMENT OF THE INTERIOR; SCOTT DE LA
VEGA, IN HIS OFFICIAL CAPACITY AS ACTING
SECRETARY OF THE INTERIOR; U.S. FISH AND WILDLIFE
SERVICE; AND MARTHA WILLIAMS, IN HER OFFICIAL
CAPACITY AS PRINCIPAL DEPUTY DIRECTOR OF THE
U.S. FISH AND WILDLIFE SERVICE,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief for the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 3,830 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.

Executed on March 31, 2021.

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Sworn to and subscribed before me by said Affiant
on the date designated below.

Date: March 31, 2021

John D. Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
Notary Public, **State of Ohio**
My Commission Expires
February 14, 2023