

IN THE
Supreme Court of the United States

STUDENTS FOR FAIR ADMISSIONS, INC.
Petitioner,

v.

PRESIDENT AND FELLOWS OF HARVARD COLLEGE,
Respondent.

STUDENTS FOR FAIR ADMISSIONS, INC.,
Petitioner,

v.

UNIVERSITY OF NORTH CAROLINA, ET AL.,
Respondents.

ON WRITS OF CERTIORARI TO THE
UNITED STATES COURTS OF APPEALS FOR THE FIRST AND FOURTH CIRCUITS

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 1st day of August 2022, that the Brief for Major American Business Enterprises as *Amici Curiae* Supporting Respondents in the above-captioned case contains 7,008 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben

Michael R. Dreeben