

IN THE  
**Supreme Court of the United States**

\_\_\_\_\_  
DONALD J. TRUMP,  
PRESIDENT OF THE UNITED STATES, ET AL.,

*Petitioners,*

v.  
SIERRA CLUB, ET AL.,

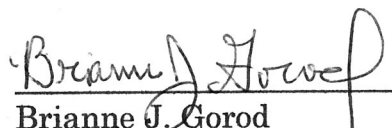
*Respondents.*

\_\_\_\_\_  
**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**  
\_\_\_\_\_

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Federal Courts Scholars as *Amici Curiae* in Support of Respondents contains 7,675 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.

Executed on January 19, 2021.

  
\_\_\_\_\_  
Brianne J. Gorod  
Counsel for *Amici Curiae*