

**CERTIFICATE OF COMPLIANCE**

**No. 20-1499**

AMERICAN CIVIL LIBERTIES UNION,  
*Petitioner,*

v.

UNITED STATES OF AMERICA,  
*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amici Curiae the Reporters Committee for Freedom of the Press and 34 Media Organizations complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and with the word count limit of Supreme Court Rule 33.1(g), containing 5875 words, excluding the parts 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 May 27, 2021.

*/s/ Bruce D. Brown*

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