

No. 20-1449

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**In the Supreme Court of the United States**

AMERICAN CIVIL LIBERTIES UNION, *Petitioner*

v.

UNITED STATES

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On Petition for a Writ of Certiorari  
to the United States Foreign Intelligence  
Surveillance Court of Review

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the accompanying Brief of Project for Privacy and Surveillance Accountability as *Amicus Curiae* Supporting Petitioners in *ACLU v. United States*, No. 20-1449 complies with the word count limitations of Supreme Court Rule 33(g) in that it contains 3,895 words, based on the word-count function of Microsoft Word – Office 365, including footnotes and excluding material not required to be counted by Rule 33(d).

/s/ Erik S. Jaffe  
Erik S. Jaffe