



CERTIFICATE OF COMPLIANCE

Nos. 20-37, 20-38

ALEX M. AZAR, II, SECRETARY OF HEALTH AND HUMAN
SERVICES, ET AL.,

Petitioners,

v.

CHARLES GRESHAM, ET AL.,

Respondents.

ARKANSAS,

Petitioner,

v.

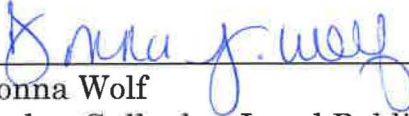
CHARLES GRESHAM, ET AL.,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* The Foundation for Government Accountability in Support of Petitioners contains 6,833 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 January 26, 2021.



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

Date: January 26, 2021

John D. Gallagher

Notary Public

[seal]



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