

No.

*In the
Supreme Court of the United States*

LEBAMOFF ENTERPRISES, INC., ET AL.

Petitioners,

v.

GRETCHEN WHITMER, GOVERNOR OF MICHIGAN, ET AL.

Respondents.

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33(1)(h), I certify that the Amicus Curie Brief Petition on behalf of petitioners complies with the word limitations in Rule 33(1)(g)(x). It contains 4395 words, including footnotes, but excluding sections exempted from the word count by Rule 33(1)(d).

This the 13th day of August, 2020.

s/ Sean M. O'Leary

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