

**IN THE
SUPREME COURT OF THE UNITED STATES**

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, <i>ET AL.</i> , <i>Petitioners</i> ,)	No. 20-685
)	
v.)	On Petition for a Writ of <i>Certiorari</i>
)	to the U.S. Court of Appeals for the
SIERRA CLUB, <i>ET AL.</i> , <i>Respondents</i> .)	Ninth Circuit
)	

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the “Brief *Amicus Curiae* of Rep. Andy Barr in Support of Petitioners” filed on behalf of Eagle Forum Education & Legal Defense Fund in the above-captioned matter contains 4,587 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 December 17, 2020.

 /s/ Lawrence J. Joseph
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