

No. 20-812

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In the  
Supreme Court of the United States

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LISA M. FOLAJTAR,

*Petitioner,*

v.

JEFFREY A. ROSEN,  
ACTING ATTORNEY GENERAL, ET AL.,

*Respondents.*

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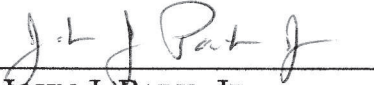
**CERTIFICATE OF WORD COUNT**

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As required by Supreme Court Rule 33.1(h), I declare that the Brief of Amicus Curiae The American Constitutional Rights Union In Support Of Petitioners in Case No. 20-782 contains 3,372 words, excluding 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 the 13th day of January 2021.

  
JOHN J. PARK, JR.  
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