

In the Supreme Court of the United States

FEDERAL BUREAU OF INVESTIGATION, ET AL.,

Petitioners,

v.

YASSIR FAZAGA, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief of Professor Laura K. Donohue as Amicus Curiae in Support of Neither Party in *Federal Bureau of Investigation, et al., v. Yassir Fazaga, et al.*, S. Ct. No. 20-828, complies with the word limitations, because it contains 7998 words.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 6, 2021



Shay Dvoretzky

