

IN THE
Supreme Court of the United States

FEDERAL BUREAU OF INVESTIGATION, ET AL.,

Petitioner,

v.

YASSIR FAZAGA, ET AL.,

Respondent.

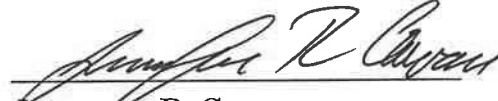
ON WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE NINTH CIRCUIT

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1, I, Jennifer R. Cowan, a member of the Bar of this Court, certify on this 28th day of September, 2021, that this Brief of Amicus Curiae on behalf of James Dempsey and Sharon Bradford Franklin in the above-captioned case contains approximately 4,570 words, excluding the parts of the document that are exempted by Supreme

Court Rule 33.1(d). The brief was prepared in 12-point Century Schoolbook font.

Respectfully Submitted

A handwritten signature in black ink, appearing to read "Jennifer R. Cowan", written over a horizontal line.

JENNIFER R. COWAN

Counsel of Record

Debevoise & Plimpton LLP