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THERAPIST L., DR. J., NURSE J., DR. M.,  
NURSE N., DR. O., DR. P., DR. S., NURSE S.,  
PHYSICIAN LIAISON X.,  
Petitioners,

v.

KATHY HOCHUL, GOVERNOR OF THE  
STATE OF NEW YORK, IN HER OFFICIAL CAPACITY,  
DR. MARY T. BASSETT, COMMISSIONER OF  
THE NEW YORK STATE DEPARTMENT OF HEALTH,  
IN HER OFFICIAL CAPACITY, LETITIA JAMES,  
ATTORNEY GENERAL OF THE STATE OF NEW YORK,  
IN HER OFFICIAL CAPACITY,  
Respondents.

#### CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF OF DRS. JAY BHATTACHARYA AND R. SCOTT FRENCH AS AMICI CURIAE IN SUPPORT OF PETITIONERS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4988 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 17th day of March, 2022.

I am duly authorized under the laws of the State of Nebraska to administer oaths.



*Renee J. Goss*  
Notary Public

*Andrew H. Cockle*  
Affiant