

No.

IN THE  
**Supreme Court of the United States**

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JOHN FITISEMANU, PALE TULI, ROSAVITA TULI,  
AND SOUTHERN UTAH PACIFIC ISLANDER COALITION,  
*Petitioners,*

v.

UNITED STATES OF AMERICA, *ET AL.*,  
*Respondents.*

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**CERTIFICATE OF COMPLIANCE**

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I hereby certify that I am a member in good standing of the bar of this Court and that the Petition for a Writ of Certiorari contains 8,778 words and complies with the word limitation established by Rule 33.1(g)(i) of the Rules of this Court.

Dated: April 27, 2022

  
Jeremy M. Christiansen