



**CERTIFICATE OF COMPLIANCE**

No. 21-1450

TURKIYE HALK BANKASI A.S., AKA HALKBANK,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief for Amicus Curiae Lord Daniel Brennan KC in Support of Petitioner contains 5,361 words, excluding the parts of the Brief 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 November 21, 2022.

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: November 21, 2022

John D. Gallagher

Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023