

In the Supreme Court of the United States

STATE OF ARIZONA, ET AL.,

Petitioners,

v.

NAVAJO NATION, ET AL.,

Respondents.

DEPARTMENT OF THE INTERIOR, ET AL.,

Petitioners,

v.

NAVAJO NATION, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for the Navajo Nation in *State of Arizona, et al. v. Navajo Nation, et al.*, S. Ct. No. 21-1484, and *Department of the Interior, et al. v. Navajo Nation, et al.*, S. Ct. No. 22-51, complies with the word limitations, because it contains 12,980 words, excluding the parts of the document exempted by Rules 33.1(d) and 24.1(f).

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

Dated: February 1, 2023


Shay Dvoretzky