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5 January 2022

Clerk  
Supreme Court of the United States  
1 First Street, NE  
Washington, DC 20002

Re: Case No. 21-932, *Trump v. Thompson*, et al.

To Whom It May Concern:

As required by Supreme Court Rule 33.1(h), I, Kelly McClanahan, counsel for *amici curiae* Government Accountability Project, Government Information Watch, National Security Counselors, Louis Fisher, Heidi Kitrosser, Mark J. Rozell, Jonathan Shaub, and Mitchel A. Sollenberger, and a member of the bar of this Court, hereby certify that the Brief filed on behalf of said *amici curiae* contains 5485 words, excluding the parts of the document which are exempted by Supreme Court Rule 33.1(d).

Sincerely,

/s/ Kelly B. McClanahan  
Kelly B. McClanahan, Esq.  
*Counsel for Amici Curiae*