

CERTIFICATE OF COMPLIANCE

No. 21-954

Joseph R. Biden, Jr.
President of the United States, *et al.*,

Petitioners

v.

State of Texas, *et al.*,

Respondents.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Public Citizen contains 7447 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 March 18, 2022.

/s/ Nandan M. Joshi