



**CERTIFICATE OF COMPLIANCE**

No. 21-954

JOSEPH R. BIDEN, JR.,  
PRESIDENT OF THE UNITED STATES, ET AL.,  
*Petitioners,*

v.

STATE OF TEXAS; STATE OF MISSOURI,  
*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Supplemental Brief for America First Legal Foundation as *Amicus Curiae* in Support of Respondents contains 2,819 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 May 9, 2022.

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

Date: May 9, 2022  
John D. Gallagher  
Notary Public

[seal]



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