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January 6, 2022

Clerk  
Supreme Court of the United States  
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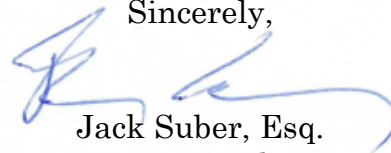
**RE NOS. 21A242, 21A243, 21A244, 21A245, 21A246, 21A247, 21A248, 21A249,  
21A250, 21A251, 21A252, 21A258, 21A259, 21A260, and 21A267:  
NATIONAL FEDERATION OF INDEPENDENT BUSINESS, ET AL. V. OCCUPATIONAL  
SAFETY AND HEALTH ADMINISTRATION, ET AL. AND  
STATE OF OHIO, ET AL. V. DEPT. OF LABOR, OCCUPATIONAL SAFETY AND  
HEALTH ADMIN., ET AL.**

Dear Sir or Madam:

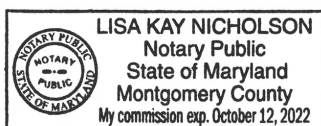
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* American Commitment Foundation, Inc. referenced above contains **2,780** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.  
Principal



Sworn and subscribed before me this 6th day of January 2022.

