

In the Supreme Court of the United States

No. 22-1178

FEDERAL BUREAU OF INVESTIGATION, ET AL., PETITIONERS

v.

YONAS FIKRE

CERTIFICATE OF COMPLIANCE WITH WORD-COUNT LIMITATIONS

In compliance with this Court's Rule 33.1(h), I, Samuel Gedge, a member of the Bar of this Court, certify that the Brief of the Institute for Justice as Amicus Curiae Supporting Respondent in the above-captioned case contains 7,997 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

Dated: December 20, 2023.

/s/ Samuel B. Gedge
SAMUEL B. GEDGE
Counsel of Record
INSTITUTE FOR JUSTICE
901 North Glebe Road, Suite 900
Arlington, VA 22203
(703) 682-9320
sgedge@ij.org