

No. 22-1218

In the Supreme Court of the United States

WENDY SMITH, ET AL.,

Petitioners,

v.

KEITH SPIZZIRRI, ET AL.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Andrew J. Pincus, counsel for The Chamber of Commerce of the United States of America and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that this Brief of Amicus Curiae In Support of Neither Party contains 3,081 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

/s/ Andrew J. Pincus

Andrew J. Pincus

Counsel of Record