

IN THE  
*Supreme Court of the United States*

LAC DU FLAMBEAU BAND OF LAKE SUPERIOR CHIPPEWA INDIANS, ET AL.,  
*Petitioners,*

v.

BRIAN W. COUGHLIN,  
*Respondent.*

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**CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS**

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Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of the Separation of Powers Clinic as Amicus Curiae in Support of Respondent contains 4571 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed March 30, 2022.

/s/ R. Trent McCotter  
R. Trent McCotter  
*Counsel of Record*