

IN THE
Supreme Court of the United States

STEVEN DONZIGER,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of Professor Jennifer L. Mascott as Amicus Curiae in Support of Petitioner contains 2866 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 November 16, 2022.

_____/s/ R. Trent McCotter_____

R. Trent McCotter

Counsel