

In the Supreme Court of the United States

JOSEPH R. BIDEN, JR., PRESIDENT OF THE UNITED STATES, ET AL.,
Petitioners,

v.

STATE OF NEBRASKA, ET AL.,
Respondents.

DEPARTMENT OF EDUCATION, ET AL.,
Petitioners,

v.

MYRA BROWN, ET AL.,
Respondents.

**On Writs of Certiorari Before Judgment to the United States Courts of
Appeals for the Fifth and Eighth Circuits**

CERTIFICATE OF COMPLIANCE

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Brief of Legal Scholars as *Amici Curiae* in Support of Petitioners contains 6,895 words, excluding the parts of the Brief that are exempted by Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 11, 2023.

/s/ Jeffrey B. Dubner

JEFFREY B. DUBNER
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 383-0794
jdubner@democracyforward.org
Counsel for *Amici Curiae*