



**CERTIFICATE OF COMPLIANCE**

Nos. 22-506, 22-535

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

*Petitioners,*

v.

NEBRASKA, ET AL.,

*Respondents.*

DEPARTMENT OF EDUCATION, ET AL.,

*Petitioners,*

v.

MYRA BROWN, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Jed Handelsman Shugerman as *Amicus Curiae* in Support of Respondents contains 7,811 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

State of Ohio  
County of Hamilton

I declare under penalty of perjury that the foregoing  
is true and correct.

Executed on February 3, 2023.

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Donna J. Moore  
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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: Feb 3, 2023

John D. Gallagher  
Notary Public

[seal]



JOHN D. GALLAGHER  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023