

No. 22-592

IN THE
Supreme Court of the United States

ARIZONA, ET AL.,

Petitioners,

v.

ALEJANDRO MAYORKAS, SECRETARY OF
HOMELAND SECURITY, ET AL.,

Respondents.

ON WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Michael R. Dreeben, a member of the bar of this Court, certify on this 9th day of February 2023, that Brief of Scholars of Federal Civil Procedure as *Amici Curiae* in Support of Respondents in the above-captioned case contains 6,757 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Michael R. Dreeben

Michael R. Dreeben