

RULE 33.1(h) CERTIFICATE OF COMPLIANCE

No. 22-592

ARIZONA, ET AL.,

Petitioners,

v.

ALEJANDRO MAYORKAS,

Respondent.

As required by Supreme Court Rule 33.1(h), I, Jeffrey T. Green, certify that the Brief for an *Amicus Curiae* in the foregoing case contains 7,007 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 9, 2023.

/s/ Jeffrey T. Green

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