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March 28, 2023

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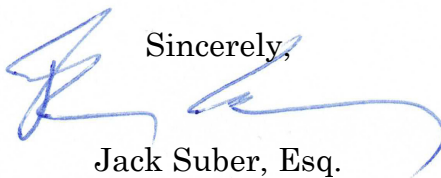
**RE NO. 22-816 THE SCHOOL OF THE OZARKS, INC., DBA COLLEGE OF THE OZARKS
V. JOSEPH R. BIDEN, JR., PRESIDENT OF THE UNITED STATES, ET AL.**

Dear Sir or Madam:

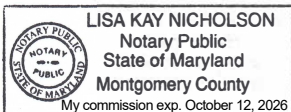
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Judicial Watch, Inc. and Allied Educational Foundation referenced above contains **2,504** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 28th day of March 2023.

Lisa K Nicholson