

No. 22-976

In the Supreme Court of the United States

MERRICK GARLAND, ET AL.,

Petitioners,

v.

MICHAEL CARGILL.,

Respondent.

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33(h), I hereby certify that the Brief of the Manhattan Institute as *Amicus Curiae* Supporting Respondent contains 3,050 words, excluding parts of the document exempted by Supreme Court Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct. Executed January 29, 2024.

/s/ Ilya Shapiro _____
Ilya Shapiro
Counsel of Record