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In the Supreme Court of the United States

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LINDSEY GRAHAM, U.S. SENATOR,  
APPLICANT,

v.

FULTON COUNTY SPECIAL PURPOSE GRAND JURY,  
RESPONDENT.

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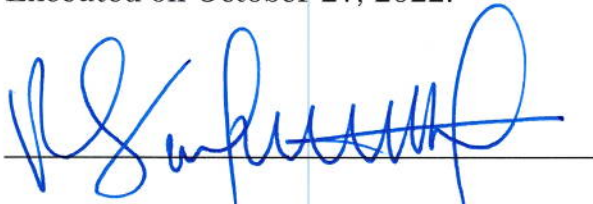
**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

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As required by Rule 33.1(h), I certify that the Brief of the Separation of Powers Clinic as Amicus Curiae contains 3779 words and the accompanying motion contains 318 words, excluding the parts of the document that are exempted by Rule 33.1(d).

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

Executed on October 27, 2022.



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R. Trent McCotter, Counsel of Record for *Amicus Curiae*