

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Motion for Leave to File *Amici Curiae* Brief, Motion for Leave to File Brief under Rule 33.2, and *Amici Curiae* of William Ligon, *et al.*, in No. 22O155, *Texas v. Pennsylvania, et al.*, contains 4,431 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

December 10, 2020

/s/ James A Davids

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