

No. 220155  
IN THE  
*Supreme Court of the United States*

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TEXAS,

*Plaintiff,*

v.

COMMONWEALTH OF PENNSYLVANIA, STATE OF GEORGIA,  
STATE OF MICHIGAN, AND STATE OF WISCONSIN,  
*Defendants.*

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the motion contains 737 words, and the brief contains 3,698 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 December 10, 2020.

/s/Adam G. Unikowsky  
Adam G. Unikowsky