

IN THE  
**Supreme Court of the United States**

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AMERICAN PETROLEUM INSTITUTE, *et al.*,  
*Petitioners,*

v.

STATE OF MINNESOTA,  
*Respondent.*

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*ON PETITION FOR A WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT*

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**CERTIFICATE OF COMPLIANCE**

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I, Victor M. Sher, a member of the Bar of this Court, as required by Supreme Court Rule 33.1(h), do hereby certify on this 5<sup>th</sup> day of January 2024, that the Supplemental Brief of Respondent State of Minnesota in Opposition contains 454 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).



Victor M. Sher – *Counsel of Record*  
SHER EDLING LLP  
100 Montgomery St., Suite 1410  
San Francisco, CA 94104  
(628) 231-2500  
vic@sheredling.com

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