

No. 23-624

In the Supreme Court of the United States

UNITED STATES OF AMERICA,
Petitioner,

v.

DONALD J. TRUMP,
Respondent.

On Petition for Writ of Certiorari Before Judgment to the
U.S. Court of Appeals for the District of Columbia Circuit

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that RESPONDENT DONALD J. TRUMP'S BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI BEFORE JUDGMENT contains 8,985 words, excluding those parts exempted by Supreme Court Rule 33.1(d).

Dated: December 20, 2023

/s/ D. John Sauer

D. John Sauer

Counsel of Record

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