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No. 23-719

DONALD J. TRUMP,  
Petitioner,  
v.  
NORMA ANDERSON et al.,  
Respondents.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF FOR DAVID P. CULLENBERG, BRYANT "CORKY" MESSNER, AND WILLIAM C. SATURLEY, AS AMICI CURIAE SUPPORTING RESPONDENTS in the above entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in New Century Schoolbook 12 point for the text and 10 point for the footnotes, and this brief contains 4494 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d), as needed.

Subscribed and sworn to before me this 31st day of January, 2024.  
I am duly authorized under the laws of the State of Nebraska to administer oaths.

State of Nebraska – General Notary  
ANDREW COCKLE  
My Commission Expires  
April 9, 2026

  
Notary Public

  
Affiant