

In the
Supreme Court of the United States

UNITED STATES POSTAL SERVICE, ET AL.,

Petitioners,

v.

LEBENE KONAN,

Respondent.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Jaba Tsitsuashvili, counsel of record for amicus and a member of the Bar of this Court, certify that the Brief of the Institute For Justice as Amicus Curiae in Support of Respondent in the above-entitled case complies with the typeface requirement of Supreme Court Rule 33.1(b), being prepared in Century Schoolbook 12 point for the text and 10 point for the footnotes, and that the petition complies with the word limit of Supreme Court Rule 33.1(g). It contains 3,415 words, excluding the parts that are exempted by Supreme Court Rule 33.1(d).

August 20, 2025

s/ Jaba Tsitsuashvili

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