IN THE SUPREME COURT OF THE UNITED STATES

UNITED STATES POSTAL SERVICE, ET AL., Petitioners,)) No. 24-351
v.	On Writ of <i>Certiorari</i> to the U.S.
LEBENE KONAN, Respondent.	Court of Appeals for the Fifth

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.l(h), I certify that the "Brief Amicus Curiae of APA Watch in Support of Respondent in Support of Affirmance" filed on behalf of Eagle Forum Education & Legal Defense Fund in the above-captioned matter contains 2,214 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 August 20, 2025.

/s/ Lawrence J. Joseph

Lawrence J. Joseph

1250 Connecticut Ave, NW, Suite 700 Washington, DC 20036

Tel: (202) 355-9452

Email: ljoseph@larryjoseph.com

Counsel for Amicus Curiae