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September 5, 2025

Clerk
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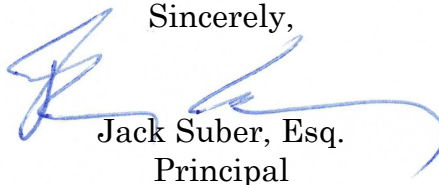
**RE NO. 24-783: ENBRIDGE ENERGY, LP, ET AL. V. DANA NESSEL, ATTORNEY
GENERAL OF MICHIGAN, ON BEHALF OF THE PEOPLE OF THE
STATE OF MICHIGAN**

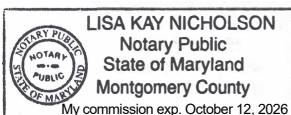
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Professor Arthur R. Miller referenced above contains **2,312** 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.

Sincerely,


Jack Suber, Esq.
Principal



Sworn and subscribed before me this 5th day of September 2025.

