

CERTIFICATE OF COMPLIANCE

No. 24-783

Enbridge Energy, LP, et al.,
Petitioners,

v.

Dana Nessel, Attorney General of Michigan, on behalf of the People of the State of
Michigan,
Respondent.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Federal Courts and Civil Procedure Scholars as *Amici Curiae* in Support of Respondent contains 6,854 words, excluding the parts of the Brief 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 October 21, 2025.



Dana Kaersvang