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August 28, 2025

Clerk Supreme Court of the United States 1 First Street, NE Washington, D.C. 20002

RE NO. 25-107: LEAH GILLIAM V. DAVID GERREGANO, COMMISSIONER TENNESSEE DEPARTMENT OF REVENUE, ET AL.

Dear Sir or Madam:

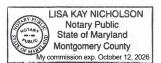
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Foundation for Individual Rights and Expression and First Amendment Lawyers Association referenced above contains **5,980** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Jack Suber, Esq.

Principal



Sworn and subscribed before me this 28th day of August 2025.

nicholson