

IN THE  
**Supreme Court of the United States**

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MARKWAYNE MULLIN, SECRETARY, DEPARTMENT OF HOMELAND SECURITY, ET AL.,

*Petitioners,*

v.

DAHLIA DOE, ET AL.,

*Respondents.*

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DONALD J. TRUMP, ET AL.,

*Petitioners,*

v.

FRITZ EMMANUEL LESLY MIOT, ET AL.,

*Respondents.*

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CERTIFICATE OF COMPLIANCE

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I hereby certify that I am a member in good standing of the bar of this Court and that the Brief of Former Ohio State Attorneys General as *Amici Curiae* contains 7,347 words and complies with the word-limitation established by Rule 33.1(g)(xii) of the Rules of this Court.

Dated: April 13, 2026

*/s/ Richard W. Mark*  
Richard W. Mark