## In the Supreme Court of the United States

Joseph Miller, et al., Petitioners,

V.

James V. McDonald, Commissioner, New York State Department of Health, et al., Respondents.

## CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I certify that the Amici Curiae Brief of America's Frontline Doctors and Dr. Simone Gold, M.D., J.D., in Support of Petitioners for Reversal contains 3,698 words, including footnotes, but excluding the parts exempted by Supreme Court Rule 33.1(d).

Executed on September 3, 2025.

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