

**RULE 33.1(h) CERTIFICATE OF COMPLIANCE**

No. 25-1342

DERICK IRISHA BROWN,

*Petitioner,*

v.

UNITED STATES,

*Respondent.*

As required by Supreme Court Rule 33.1(h), I, Collin P. Wedel, certify that the Brief of Professor Randy E. Barnett as *Amicus Curiae* in Support of Petitioner in the foregoing case contains 5,665 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.

Executed on July 2, 2026.

/s/ Collin P. Wedel

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