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July 23, 2026

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Washington, D.C. 20002

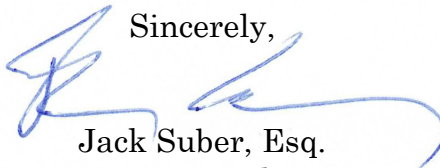
**RE 25-1408: GOLDMAN SACHS BANK USA, DBA MARCUS BY GOLDMAN SACHS V.
RHEA ANN BROWN, ET AL.**

Dear Sir or Madam:

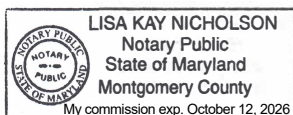
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* American Bankers Association referenced above contains **2,085** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

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

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 23rd day of July 2026.

