

In the Supreme Court of the United States

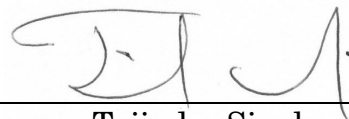
SUNCOR ENERGY (U.S.A.) INC., ET AL.,
Petitioners,

v.

COUNTY COMMISSIONERS OF BOULDER COUNTY, ET AL.,
Respondents.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that, pursuant to Rule 33.1(h) of the Rules of this Court, the Brief for Jonathan H. Adler as Amicus Curiae Supporting Respondents and Affirmance complies with the word limit set forth in Rule 33.1(g)(xiv) of the Rules of this Court. Exclusive of the portions excluded by Rule 33.1(d), the brief contains 7,933 words. (The undersigned is relying on the word-count utility in Microsoft Word, the word-processing system used to prepare the brief, which is set to include footnotes in the word count.)



Tejinder Singh
August 3, 2026