

**In the Supreme Court of the United States**

TURTLE MOUNTAIN BAND OF CHIPPEWA INDIANS, ET AL.,

*Petitioners,*

v.

MICHAEL HOWE, IN HIS OFFICIAL CAPACITY AS  
SECRETARY OF STATE OF NORTH DAKOTA,

*Respondent.*

**CERTIFICATE OF COMPLIANCE**

I, Charles A. Rothfeld, counsel for *Amici* Voting Rights Historians and a member of the Bar of this Court, certify pursuant to Rule 33.1(h) of the Rules of this Court that the Brief of Voting Rights Historians as *Amici Curiae* In Support of Petitioners contains 5876 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

October 6, 2025

/s/ Charles A. Rothfeld

CHARLES A. ROTHFELD

*Counsel of Record*

*Mayer Brown LLP*

*1999 K Street, NW*

*Washington, DC 20006*

*(202) 263-3000*

*crothfeld@mayerbrown.com*