

No. 25-365

In the Supreme Court of the  
United States

DONALD J. TRUMP, ET AL.,

Petitioners

v.

BARBARA, ET AL.,

Respondents

---

ON WRIT OF CERTIORARI  
TO THE UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT

---

CERTIFICATION OF WORD COUNT  
PURSUANT TO RULE 33.1(h)

The BRIEF FOR AMICUS CURIAE ARTICLE III PROJECT IN SUPPORT OF PETITIONERS contains 7,715 words, excluding the parts of the brief that are exempted by Supreme Court Rule 33.1(d), and thus complies with the word limitations set forth in Rule 33.1(g). This declaration is made in compliance with 28 U.S.C. § 1746.

Date: January 23, 2026

/s/ Stephen P. Halbrook  
STEPHEN P. HALBROOK\*  
3925 Chain Bridge Road, Suite 403  
Fairfax, VA 22030  
(703) 352-7276  
protell@aol.com  
\*Counsel of Record