

CERTIFICATE OF COMPLIANCE


No. 25-365

DONALD J. TRUMP, ET AL, *Petitioners*,  
v.  
BARBARA, ET AL, *Respondents*.

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* THE CLAREMONT INSTITUTE'S CENTER FOR CONSTITUTIONAL JURISPRUDENCE in the above-referenced case, contains 7,466 words, excluding the parts of the brief 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 January 27, 2026

  
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John C. Eastman  
Counsel for *Amicus Curiae*