

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



John C. Eastman
Counsel for *Amicus Curiae*