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February 3, 2026

Clerk
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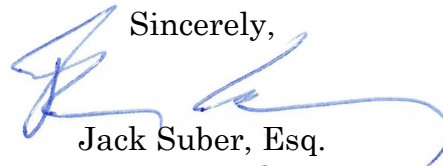
**RE NO. 25-365: DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.
V. BARBARA, ET AL.**

Dear Sir or Madam:

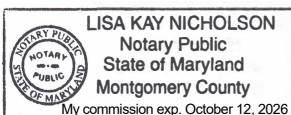
As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* Gerard N. Magliocca referenced above contains **1,720** words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,



Jack Suber, Esq.
Principal



Sworn and subscribed before me this 3rd day of February 2026.

