

IN THE
Supreme Court of the United States

DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, *et al.*,
Petitioners,

v.

BARBARA, *et al.*,
Respondents.

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

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I, Noah A Levine, a member of the bar of this Court, certify that the accompanying Brief of Citizenship Law Scholars as Amici Curiae Supporting Respondents contains 7,964 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on February 18, 2026.

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