

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

I am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 24th day of February, 2026, that the Brief for Professors Gabriel J. Chin, Paul Finkelman, and Erika Lee as *Amici Curiae* in Support of Respondents contains 7,885 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 24, 2026

/s/ Andrew S. Ong

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