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February 26, 2026

Clerk
Supreme Court of the United States
1 First Street, NE
Washington, D.C. 20002

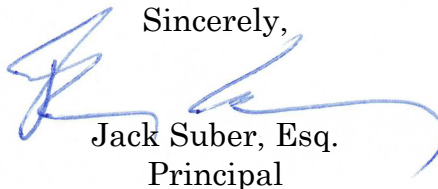
**RE NO. 25-365: DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES, ET AL.
V. BARBARA, ET AL.**

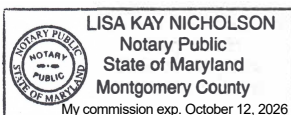
Dear Sir or Madam:

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amici Curiae* Federal Indian Law Scholars Gregory Ablavsky and Bethany Berger referenced above contains **7,739** 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 26th day of February 2026.

