

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, John T. Nakahata, am a member of the Bar of this Court, and as required by Supreme Court Rule 33.1(h), I certify this 26th day of February that the Amicus Curiae Brief of Professor Eric L. Muller in Support of Respondents complies with the word limitations, as it contains 4,922 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

February 26, 2026

/s/ John T. Nakahata

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