

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 Rule 33.1(h), I, Roy T. Englert, Jr., counsel for *amicus curiae* American Bar Association and a member of the Bar of this Court, hereby certify that the Brief of *Amicus Curiae* American Bar Association in Support of Respondents contains 7,998 words, excluding the parts of the brief that are exempted by Rule 33.1(d).

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



Roy T. Englert, Jr.

February 26, 2026