

SUPREME COURT OF THE UNITED STATES

No. 25-449

STEPHEN THALER,

Petitioner,

v.

SHIRA PERLMUTTER, REGISTER OF COPYRIGHTS
AND DIRECTOR OF THE UNITED STATES
COPYRIGHT OFFICE, *ET AL.*,

Respondents.

CERTIFICATE OF WORD COUNT

As required by Supreme Court Rule 33.1(h), I certify that the accompanying BRIEF OF *AMICI CURIAE* PHYLLIS SCHLAFLY EAGLES AND EAGLE FORUM EDUCATION & LEGAL DEFENSE FUND IN SUPPORT OF PETITIONER dated November 12, 2025, contains 2,551 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

Executed on this 11th day of November, 2025.

/s/ Andrew L. Schlafly

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